



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

August 6, 2012

Re: Gallia County
Quail Creek Mobile Home Park
Compliance Evaluation Inspection
NPDES Permit 0PV00002*FD
Correspondence (PWW)

Ms. Mary Harrison-Reed, V.P.
Elsea, Inc.
P.O. Box 580
2015 Stoneridge Drive
Circleville, Ohio 43113

Dear Ms. Harrison-Reed:

On July 19, 2012, I conducted a Compliance Evaluation Inspection of the Quail Creek Mobile Home Park wastewater treatment facility located at 437 Cora Mill Road, Rodney, Ohio. Paul Moss, operator, represented Quail Creek Mobile Home Park and accompanied me during the inspection. The purpose of the inspection was to determine Quail Creek Mobile Home Park's compliance with NPDES Permit Number 0PV00002*FD and the Ohio Water Pollution Control Act, Revised Code Chapter 6111. The inspection was also in response to a complaint received on the morning of July 18, 2012, from an area resident, who stated that the Quail Creek Mobile Home Park wastewater treatment plant was not running and that it was discharging untreated sewage into the stream which flows near his residence.

We realize that the above referenced permit has not yet been transferred to Elsea, Inc. We recommend that the permit be transferred to Elsea, Inc. immediately, so that Elsea has the authorization to discharge.

As a result of the inspection and review of our files, I have the following comments:

1. The trash trap needed to be pumped. Reportedly, this is done quarterly, and was to be pumped out soon.
2. The aeration basin was under aeration, with one blower in service. The other (back-up) blower was not operable but was to be restored to service on July 21, 2012. The water under aeration was gray and appeared to be diluted. Both return activated sludge lines (RAS) were functioning. The aeration equipment control box, exhibited some damaged wiring insulation, from the recent electrical problems. The control box wiring and components appeared old. An electrician must inspect the box and perform any necessary electrical updates or repairs to insure reliable operation.
3. The operator stated the dosing tank electrical wiring is also old. Please have your electrician inspect all plant wiring to determine what improvements may be needed.

4. The sand filter nearest the receiving stream had a considerable amount of sludge on the surface, as well as some vegetative growth. The other sand filter was nearly clean, but did have some sludge on the surface. The presence of sludge on the sand filters indicates high flows are washing sludge into the dosing tank from the clarifier. The high flows are reportedly from infiltration/inflow of clean water into the collection system during times of rainfall. Allowing excessive infiltration/inflow of the collection system is a violation of Part II, Item E of your NPDES permit (i.e. the sewerage system is not being maintained in good working order).
5. The plant effluent was of low flow, and appeared slightly cloudy. The receiving stream at the outfall was cloudy.
6. Paul Moss and I inspected the receiving stream, unnamed tributary to Mud Creek, where it flows under Bostic Road, one quarter mile south of Cora Mill Road. The Ohio Department of Natural Resources (ODNR) Wildlife officers Roy Rucker and L. Lee Van Allen accompanied us. The stream at this point was cloudy and exhibited what appeared to be a sewage coating of the base of the stream. A white, stringy, sewage associated growth was also observed on some of the rocks in the stream at this point. Officer Rucker reported that there was a sewage like coating of the stream downstream from this point for a distance of 500-600 yards. We inspected the stream at Vanco Road and did not see evidence of sewage in the stream. Paul Moss then left. The officers and I then inspected the stream along Bostic Road, about midway between Cora Mill Road. and Vanco Road. In this location the stream appeared slightly discolored. The evidence of sewage in the receiving stream is a violation of Part III, Item 2, of the permit, which states that the effluent shall, at all times, be free of substances that will adversely affect aquatic life, create a nuisance, or impair instream or downstream water uses.
7. Paul Moss stated that on Thursday July 5, 2012, while he was present at the wastewater treatment facility, one of the blower motors began to smoke and the blower stopped functioning. The next day, July 6, 2012, while at the facility with a technician from Big River Electric, Paul discovered that the second (back-up) blower had stopped functioning overnight. Since Ohio EPA was not notified of the bypass of treatment within 24 hours of the problem, this is a violation of Part III, Item 12 (Noncompliance Notification), of your NPDES permit.
8. It was noted that there is no potable water at the treatment plant; only water pumped from the clarifier for maintenance purposes. We recommend that you provide potable water at the plant site for operator use.
9. The dosing tank pumps do not have pump run-time meters on them. Run-time meters would provide a far better effluent flow estimate than water use records. The current plant effluent flow estimates that are being reported do not include clean water infiltration/inflow, and are therefore very inaccurate.

10. Trash trap contents are pumped quarterly by Ron Evans Enterprises. The contents must be taken to a publicly owned treatment works with an NPDES permitted municipal sludge handling.
11. There is an administrative error in the NPDES permit table on page 2, which we intend to correct. The 1,000 (#/100 ml) monthly loading limit, should be a monthly concentration limit. The number is in the wrong column.
12. A review of the Discharge Monitoring Reports (DMR's) for the period June 2011, through May 2012, revealed the following permit violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
Feb. 2012	001	80082	CBOD 5 day	30D Conc	10	17.	2/1/2012
Feb. 2012	001	80082	CBOD 5 day	30D Qty	0.833	.83649	2/1/2012
Feb. 2012	001	80082	CBOD 5 day	1D Conc	15	17.	2/13/2012

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

We have received Paul Moss's report addressing the above violations. It did not provide an explanation for the violations or a course of action intended to prevent future violations. We request, within ten days of receipt of this letter, written information as to what additional steps you will take to prevent further occurrences.

Attached is a copy of the inspection report which indicates marginal and/or unsatisfactory evaluations of the following areas: Operations & Maintenance, Collection System, Flow Measurement, Effluent/Receiving Waters. I gave these ratings because of the deficiencies mentioned in the above comments. Quail Creek Mobile Home Park must take the appropriate actions to return the facility to compliance with all terms and conditions of the NPDES permit.

Please respond to this letter by August 17, 2012.

Sincerely,


Dan Messerly
District Representative
Division of Surface Water

DM/dh

Enclosure

c: Paul Moss
c: Patty Jones, former owner, Quail Creek Mobile Home Park



State of Ohio Environmental Protection Agency
Southeast District Office

Municipal NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
0PV00002*FD	OH0048526	July 19, 2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Quail Creek Mobile Home Park 437 Cora Mill Road Rodney, Ohio	12:00 p.m.	August 1, 2008
	Exit Time	Permit Expiration Date
	3:00 p.m.	July 31, 2013
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Paul Moss, Operator	(740) 645-0481	
Name, Address, and Title of Responsible Official	Phone Number	
Previous Owner: Patty Jones, Quail Creek MHP, 437 Cora Mill Road, Gallipolis, Ohio 45631	(614) 245-9374	
Owner: Mary Harrison-Reed, V.P., Elsea, Inc., P.O. Box 580, 2015 Stoneridge Drive, Circleville, Ohio 43113	(740) 474-5710	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)					
S	Permit	U	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	N	Compliance Schedules
U	Operations & Maintenance	U	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal		Other
U	Collection System				

Section D: Summary of Findings (attach additional sheets if necessary)	
See cover letter.	
Paul Moss, Operator, does chlorine, D.O. on-site. Gallipolis does F.C., TSS, Ammonia, CBOD analyses. Samples are not refrigerated when transported to Gallipolis and this must be done. Sludge is land applied on-site; trash trap pumped quarterly by Ron Evans Enterprises. Paul Moss keeps maintenance/daily log on-site.	
Inspector	Reviewer
	
8/7/12 Date	8/8/12 Date
Dan Messerly Division of Surface Water Southeast District Office	Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office