



**Environmental
Protection Agency**

John Kasich, Governor
Mike DeWine, Lt. Governor
Walter D'Onofrio, Director

September 6, 2012

John Francisco, Owner
Hayden Heights MHP
P O Box 20434
Columbus, OH 43220

**Re: Hayden Heights MHP
NPDES Permit 4PV00110/ OH0136051
Reconnaissance Inspection
Franklin County
Notice of Violation**

Dear Mr. Francisco:

On August 22, 2012, a Reconnaissance Inspection was conducted at the Hayden Heights MHP. Present for the inspection were Pat Hickman, the Operator of Record, Elmer, an operator, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

Findings:

1. Attached are compliance tables since January 2011. There have been numerous violations. **Continued non-compliance is unacceptable.**
2. There is a large amount of filamentous bacteria within the aeration system which has greatly reduced settleability within the clarifier. Jon van Dommelen of Ohio EPA's Compliance Assistance Unit (CAU) made a visit in August 2012 to help determine the filaments. **I highly recommend continuing to work with CAU in order to improve conditions.**
3. It was recently discovered that there was short-circuiting over the southern clarifier weir. Mr. Hickman believes he has abated this problem by modifying how the influent enters the plant. The influent wet well previously had separate piping running to each aeration basin with separate pumps. The piping has been combined and now splits via a t-joint very close to the aeration tanks.
4. Waste activated sludge is stored in an aerobic digester. The operators would turn off the blowers and then decant clear supernatant on the sludge drying beds. It was recently discovered that the sludge drying beds drain to the outfall rather than the headworks of the plant. Operators have discontinued this practice and instead pump from the digester to the headworks.

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5. Mr. Hickman called me on August 31, 2012, to inform me that additional investigation had been done in the aeration tank. It was discovered that the diffusers were severely deficient. Additionally, there was a thick layer of sludge on the bottom of the aeration tank. **Please provide a schedule for how you will address the diffusers.**

The facility is currently on the Significant Non-Compliance list due to the extent and frequency of violations. In particular, ammonia and fecal coliform results have greatly exceeded the NPDES permit effluent limits this summer. **If the facility continues to fail to meet NPDES permit limits, enforcement action will be taken which may include a civil penalty.**

Attached is the inspection checklist. **A response is requested by September 21, 2012.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.ohio.gov.

Sincerely,



Cole Miller
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Cole Miller

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PV00110	OH0136051	RI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
8/22/2012	12:00 PM	12:45 PM	Yes	Yes

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Hayden Heights MHP	2/1/2009
	Permit Expiration Date
	1/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Pat Hickman, Operator of Record Elmer, Operator	
Name and Title of Responsible Official	Phone Number
John Francisco, Owner	(614) 451-2899

SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

U	NPDES Compliance	The facility has numerous effluent violations.
U	Operations & Maintenance	The diffusers require maintenance.
U	Facility Site Review	The facility had short-circuiting to the southern clarifier weir. Additionally, there is a filamentous bacteria problem which is reducing settleability.
N	Collection System	
S	Flow Measurement	
N	Receiving Waters	
N	Laboratory	

Comments:

Signatures

	8/31/12		8/31/12
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

Compliance Data for Hayden Heights MHP between 1/1/2011 to 8/1/2012

Summary

Permit Effluent Limit Violations: 68

Permit Effluent Code Violations: 3

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2011	001	Total Suspended Solids	7D Qty	2.7	3.08932	3/1/2011
April 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.68	.69932	4/8/2011
May 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.85	5/1/2011
May 2011	001	Nitrogen, Ammonia (NH3)	30D Qty	0.15	.25799	5/1/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	5/2/2011
May 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.2	5/15/2011
May 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.23	.30477	5/15/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	5/16/2011
June 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	9.8	6/1/2011
June 2011	001	Nitrogen, Ammonia (NH3)	30D Qty	0.15	.96904	6/1/2011
June 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	4.8	6/8/2011
June 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.23	.54322	6/8/2011
June 2011	001	pH	1D Conc	6.5	6.	6/20/2011
June 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	14.8	6/22/2011
June 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.23	1.39485	6/22/2011
July 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.23333	7/1/2011
July 2011	001	Nitrogen, Ammonia (NH3)	30D Qty	0.15	.31895	7/1/2011
July 2011	001	Fecal Coliform	30D Conc	1000	1600.	7/1/2011
July 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	10.4	7/15/2011
July 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.23	.74792	7/15/2011

July 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	7/23/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	5.73333	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	9.1	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.15	.44334	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	.70265	8/1/2011
August 2011	001	pH	1D Conc	6.5	5.45	8/8/2011
August 2011	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	8.	8/15/2011
August 2011	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	.61771	8/15/2011
September 2011	001	Fecal Coliform	30D Conc	1000	4800.	9/1/2011
September 2011	001	Fecal Coliform	7D Conc	2000	4800.	9/1/2011
December 2011	001	Total Suspended Solids	30D Conc	12	22.5	12/1/2011
December 2011	001	Total Suspended Solids	30D Qty	1.8	3.39742	12/1/2011
December 2011	001	Total Suspended Solids	7D Conc	18	38.	12/8/2011
December 2011	001	Total Suspended Solids	7D Qty	2.7	5.65252	12/8/2011
December 2011	001	Dissolved Oxygen	1D Conc	6.0	5.1	12/21/2011
December 2011	001	Total Suspended Solids	7D Conc	18	39.	12/22/2011
December 2011	001	Total Suspended Solids	7D Qty	2.7	6.52458	12/22/2011
December 2011	001	Dissolved Oxygen	1D Conc	6.0	5.7	12/27/2011
January 2012	001	Total Suspended Solids	30D Conc	12	12.4	1/1/2012
January 2012	001	Total Suspended Solids	7D Conc	18	44.	1/22/2012
January 2012	001	CBOD 5 day	7D Conc	15	17.	1/22/2012
May 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.43333	5/1/2012
May 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	5.4	5/1/2012
May 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	3.9	5/15/2012
June 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.9	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	3.1	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.15	.27002	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	.28864	6/1/2012
June 2012	001	CBOD 5 day	30D Conc	10	11.25	6/1/2012
June 2012	001	CBOD 5 day	7D Conc	15	20.	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	2.7	6/15/2012

June 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	.2514	6/15/2012
July 2012	001	Total Suspended Solids	30D Conc	12	22.4	7/1/2012
July 2012	001	Total Suspended Solids	7D Conc	18	39.	7/1/2012
July 2012	001	Total Suspended Solids	30D Qty	1.8	2.58894	7/1/2012
July 2012	001	Total Suspended Solids	7D Qty	2.7	5.31414	7/1/2012
July 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	24.6	7/1/2012
July 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	30.	7/1/2012
July 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.15	3.04465	7/1/2012
July 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	4.0878	7/1/2012
July 2012	001	Total Suspended Solids	7D Conc	18	31.	7/8/2012
July 2012	001	Total Suspended Solids	7D Qty	2.7	2.81604	7/8/2012
July 2012	001	CBOD 5 day	7D Conc	15	17.	7/8/2012
July 2012	001	Dissolved Oxygen	1D Conc	6.0	2.5	7/9/2012
July 2012	001	Total Suspended Solids	7D Conc	18	22.	7/15/2012
July 2012	001	Total Suspended Solids	7D Qty	2.7	2.99772	7/15/2012
July 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	23.5	7/15/2012
July 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	3.20211	7/15/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
August 2011	001	Fecal Coliform	AK	8/1/2011
June 2012	001	Fecal Coliform	AK	6/4/2012
July 2012	001	Fecal Coliform	AK	7/2/2012

Flow Data for Hayden Heights MHP between 1/1/2011 and 8/1/2012

	Date	Flows (MGD)
Ten Highest Flows	5/5/2011	0.102
	4/26/2011	0.102
	4/30/2011	0.094
	2/20/2011	0.073
	4/23/2011	0.072
	2/17/2011	0.068
	3/2/2011	0.068
	3/3/2011	0.068
	4/24/2011	0.064
	4/27/2011	0.064
Average Flow Rate		0.023