



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 4, 2012

Gary Spanner, Trustee/Owner
Country Side MHP
5800 Griffiths Lane
Powell, OH 43065

**Re: Country Side MHP
NPDES Permit 4PY00006/ OH0121355
Semi-Public CEI
Franklin County
Notice of Violation**

Dear Mr. Spanner:

On November 27, 2012, a Compliance Evaluation Inspection (CEI) was conducted at the Country Side MHP. Present for the inspection were Bob Gomez, the operator of record, Walter Burke, the park manager, 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 between January 2011 and November 2012. There have been multiple dissolved oxygen and ammonia violations which the operator has attributed to ponding of the sand filters. During the inspection, it was determined that the sludge was settling slowly, likely caused by too much biomass within the treatment system.
2. One sand filter was ponded with an estimated amount of 3" of sludge on the sand beds. I similarly noted ponding of sand filters in the previous inspections on February 22, 2011, and February 27, 2012. Failure to keep all treatment systems in good working order is a violation of the permit. **Please indicate how the facility will address this situation.**
3. The facility also has some inflow and infiltration (I&I) issues. The design rate of 0.018 MGD has been exceeded 16% of the time. I&I reduction should be an ongoing process in order to prevent hydraulic surges which can overload the plant and force solids onto the sand filters. **Please respond with a schedule to address I&I.**

4. The trash trap and the baffle of the clarifiers had large amounts of solids accumulated behind them. **Please clean or pump these by December 28, 2012, and provide documentation to this office.**
5. The permit renewal was issued on October 1, 2012, and became effective on November 1, 2012. In addition to having quarterly sampling requirements for phosphorus and nitrogen parameters, the minimum staffing requirements are now in effect. This means that the operator of record must be onsite 2 days a week for a minimum of 1 hour per week. The requirement is not currently being met. **Please ensure that this happens immediately.**
6. There is no official Operator of Record listed for the facility. **Please submit a notification form to this office.** I have notified the operator via e-mail and provided him with the appropriate forms.
7. I indicated to the operator that it may be beneficial to contact the Compliance Assistance Unit (CAU) to assist with sludge handling. You can contact Mark Stump at (614) 644-2028 or via e-mail at mark.stump@epa.ohio.gov. **Note that you should work to improve the treatment works while scheduling an appointment with CAU.**

Attached is inspection checklist. **A response is requested by December 28, 2012.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 644-3846 or e-mail at cole.miller@epa.state.oh.us.

Sincerely,



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

ec: Cole Miller

CM/nsm 11-27-2012

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PY00006	OH0121355	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
11/27/2012	10:30 AM	11:05 AM	Yes	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Country Side MHP 4977 Avery Road Dublin, OH	11/1/2012
	Permit Expiration Date
	10/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Walter Burke, Park Manager Bob Gomez, Operator of Record	
Name and Title of Responsible Official	Phone Number
Gary Spinner, Trustee/Owner	(614) 764-2022

SECTION C: AREAS EVALUATED DURING INSPECTION

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

U	NPDES Compliance	7 months with violations in 2012.
U	Operations & Maintenance	Facility has too much biomass in treatment system.
M	Facility Site Review	One sand filter was ponded.
M	Collection System	I&I is present.
S	Flow Measurement	
S	Receiving Waters	
N	Laboratory	

Comments:

Sludge wasting procedures need to be improved.
I&I reduction should be done.

Signatures

 11/29/12	 11/30/12
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Country Side MHP between 1/1/2011 to 11/1/2012

Summary

Permit Effluent Limit Violations: 11
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 15
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	0.20	.24148	1/1/2012
February 2012	001	Dissolved Oxygen	1D Conc	6.0	4.	2/28/2012
March 2012	001	Dissolved Oxygen	1D Conc	6.0	2.5	3/20/2012
March 2012	001	Dissolved Oxygen	1D Conc	6.0	3.1	3/26/2012
April 2012	001	Dissolved Oxygen	1D Conc	6.0	2.7	4/17/2012
April 2012	001	Dissolved Oxygen	1D Conc	6.0	3.	4/24/2012
May 2012	001	Dissolved Oxygen	1D Conc	6.0	5.6	5/8/2012
June 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.9	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3)	1D Conc	1.5	1.9	6/5/2012
October 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.2	10/1/2012
October 2012	001	Dissolved Oxygen	1D Conc	6.0	5.9	10/2/2012

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2011	001	Color, Severity	1/Day	1	0	21/2011
March 2011	001	Odor, Severity	1/Day	1	0	3/21/2011
March 2011	001	Turbidity, Severity	1/Day	1	0	3/21/2011
August 2011	001	Color, Severity	1/Day	1	0	8/1/2011
August 2011	001	Odor, Severity	1/Day	1	0	8/1/2011
August 2011	001	Turbidity, Severity	1/Day	1	0	8/1/2011
March 2012	001	Color, Severity	1/Day	1	0	3/23/2012
March 2012	001	Odor, Severity	1/Day	1	0	3/23/2012
March 2012	001	Turbidity, Severity	1/Day	1	0	3/23/2012
March 2012	001	Color, Severity	1/Day	1	0	3/30/2012
March 2012	001	Odor, Severity	1/Day	1	0	3/30/2012
March 2012	001	Turbidity, Severity	1/Day	1	0	3/30/2012
July 2012	001	Color, Severity	1/Day	1	0	7/2/2012
July 2012	001	Odor, Severity	1/Day	1	0	7/2/2012
July 2012	001	Turbidity, Severity	1/Day	1	0	7/2/2012

Flow Data for Country Side MHP between 1/1/2011 and 11/1/2012

	Date	Flows (MGD)
Ten Highest Flows	2/25/2011	0.072
	5/3/2011	0.063
	12/6/2011	0.060
	3/10/2011	0.057
	4/5/2011	0.055
	11/30/2011	0.051
	4/25/2011	0.047
	3/1/2011	0.045
	5/26/2011	0.045
	3/19/2012	0.045
Average Flow Rate		0.015

Method of flow monitoring:	Hour meters on dosing tank
Type of alarms for plant:	Visual Alarms on both pump stations*

SECTION D: PRELIMINARY TREATMENT

Type of Preliminary Treatment? Trash trap		
	Yes	No
Does the unit require pumping or cleaning?	X	<input type="checkbox"/>
Maintenance of preliminary treatment is satisfactory?	<input type="checkbox"/>	X

Comments/Status:

Influent flows via gravity into facility's former WWTP now equipped with trash trap and blowers for equalization purposes. Then flow is pumped to the new section of the plant.

*Facility must pump out trash trap.

SECTION E: AERATION

Color of ML SS?	Dark Milky Brown		Yes	No	
	Yes	No			
Aeration is taking place	X	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	X
Blowers are operational	X	<input type="checkbox"/>	Blowers are on a timer	X	<input type="checkbox"/>
Skimmers are operational	X	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	X
Diffusers are operational	X	<input type="checkbox"/>	Grating is present	X	<input type="checkbox"/>
Sludge return is operational	X	<input type="checkbox"/>	Foam present?	<input type="checkbox"/>	X
Overall maintenance satisfactory?				X	<input type="checkbox"/>

Comments/Status:

Facility is running with too concentrated MLSS. After 18 minutes, a sample had settled to only 910-920 mL.

SECTION F: CLARIFIERS

Clarity of water topping weir	Mostly clear	
	Yes	No
Weir is clean?	<input type="checkbox"/>	X
Weir is in good condition (i.e., level, free of corrosion, etc.)?	<input type="checkbox"/>	X
Is effluent present in weir channel?	X	<input type="checkbox"/>
Is the sludge blanket visible?	X	<input type="checkbox"/>
Do the clarifier walls need scraping?	<input type="checkbox"/>	X
Is sludge settling properly?	<input type="checkbox"/>	X
Overall maintenance of the clarifier is satisfactory?	X	<input type="checkbox"/>

Comments/Status:

Pin floc and floating solids were visible. Wasting should be increased.

SECTION G: TERTIARY TREATMENT

	Yes	No		Yes	No
Surface sand filters:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface/Upflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overall maintenance satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Comments/Status: One of the three sand filters was ponded with a layer of sludge approximately 3 inches high. Ponding is a possible cause of DO violations.

SECTION H: SLUDGE HANDING / STORAGE DISPOSAL

Sludge is periodically wasted from what component?	Clarifier	
Sludge disposal contractor?	N/E	
Sludge disposal location?	N/E	
	Yes	No
Does the WWTP have sludge drying beds?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the WWTP have a sludge holding tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the maintenance on the sludge handling unit adequate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status:

SECTION I: RECORD KEEPING / OPERATOR OF RECORD

	Yes	No
Operator of Record holds appropriate license of class required by permit.	X	
Has the Operator of Record submitted an ORC Notification form?		X*
Copy of certificate of Operator of Record displayed on-site?		X
If a Staffing Reduction plan has been approved, are the stipulations of the plan being met?		
Operator of Record log book provided?	X	
Minimum operator staffing requirements fulfilled (OAC 3745-7)?		X*
Log book kept onsite (in an area protected from weather)?	X	
Log book contains the following		
Identification of treatment works	X	
Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	X	
Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)	X	
Laboratory results (unless documented on bench sheets)	X	
Identification of person making entries	X	
Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred	X	
Logbook Format		Bound book

Comments/Status:

There are no Operators of Record listed on our records. **An ORC Notification form is necessary.**

The staffing requirements became effective November 1, 2012.

SECTION J: PLANT DISCHARGE

Discharge point is:	Hayden Run via storm sewer
Discharge is visible:	No
Name of discharge point:	Hayden Run
Marker present:	N/A
Quality of effluent:	Clear
Contract laboratory:	MASI

Comments/Status