



**Environmental  
Protection Agency**

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

July 10, 2012

Mr. Les Bowman, Owner  
Indian Hills MHP  
5888 State Route 36  
Piqua, Ohio 45356

**RE: Indian Hills Reconnaissance Inspection and Notice of Violation, NPDES  
Permit No. 1PV00108\*BD/OH0127361**

Dear Mr. Bowman:

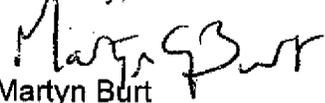
I am writing in follow-up to the June 28, 2012 Reconnaissance Inspection conducted at Indian Hills Mobile Home Park, Township Road 55, Jefferson Township, Logan County. The inspection was performed as part of the compliance review for the park.

The inspection findings are included in the attached report. There are three items that require a written response. Please provide the requested information by no later than the dates noted.

In order to address ongoing permit compliance issues, as well as treatment issues associated with clear water infiltration and inflow into the system, an engineering review of both the treatment plant and collection system will need to be performed. A formalized schedule for performing this work will need to be developed. The district office will be recommending the issuance of a Director's Final Findings and Orders as part of the formalized schedule process.

If you have any questions, please call Mr. Joseph Reynolds at (937) 285-6097.

Sincerely,

  
Martyn Burt  
Compliance Supervisor  
Division of Surface Water

Enclosure

ec: Logan County Health Department  
cc: Robert Gomez, Winelco Inc.

MB/ca



State of Ohio Environmental Protection Agency  
Southwest District Office

### NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00108*BD	OH0127361	6/28/2012	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Indian Hills MHP Township Road 55, Jefferson Township Bellefontaine, Ohio	9:50AM	8/1/2007
	Exit Time	Permit Expiration Date
	10:45AM	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Robert Gomez, Contract Operator	(513) 755 - 8050	
Name, Address and Title of Responsible Official	Phone Number	
Les Bowman, Owner 5888 State Route 36 Piqua, Ohio 45356	(937) 603 - 3456	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	
Inspector	Reviewer
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date: 7/9/12	Date: 7/10/12

## Inspection Findings

On Thursday June 28, 2012 an inspection of the Indian Hills MHP waste water treatment plant was conducted by Joe Reynolds. Robert Gomez (Contract Operator) was present during the inspection.

National Pollutant Discharge Elimination System (NPDES) permit number 1PV00108\*BD was issued on July 12, 2007. This permit will expire on July 31, 2012. An NPDES renewal application was submitted on February 13, 2012. A draft permit 1PV00108\*CD was issued on June 25, 2012.

NPDES permit number 1PV00108\*BD contains a compliance schedule for conducting a sanitary sewer system evaluation (SSE). All of the compliance dates have passed (conduct SSE- 2/1/2008, submit SSE findings - 3/1/2008, implement SSE finding – 8/1/2008, summary reports 9/1/ 2008). In order to establish a new schedule, a recommendation for the issuance of Directors Final Findings and Orders will be made.

The waste water system at the park continues to experience problems associated with hydraulic surges. In order to control the loss of solids and treatment, influent flows are limited to 5 gpm at the lift station. This causes flow to back-up into the system (system storage). No overflows have been detected / reported.

The flow equalization tank is constantly full. The automatic pump alternator had to be replaced two weeks ago. Both pumps alternate between lead and lag.

The water system at the park is producing 9,000 to 13,000 gpd. The amount of filter back wash being generated was unknown.

A review of flow data from April 2011 through April 2012 revealed the following number of days per month that flows exceed plant design (7,500 gpd): April - 25 days, May - 29 days, June - 0 days, July - 2 days, August – 3 days, September – 11 days, October - 14 days, November 11 days, December - 30 days, January - 19 days, February - 22 days, March - 10 days, and April - 5 days.

## Inspection Findings (cont.)

The treatment system consist of the following units: trash trap, flow equalization, extended aeration tank, clarification, fixed media filter, dosing tank, two slow surface sand filters, chlorination / dechlorination / post aeration tanks.

A review of electronic discharge monitoring reports from February, 2011 through March, 2012 revealed the following violations: suspended solids (3), CBOD5 (4), and ammonia (2). During the same time period there were (2) code violations, and (2) frequency violations.

## Facility Inspection

Flow enters the plant (trash trap) by gravity. The trash trap was filled to the lid with solids. Moisture by the lid suggests a possible leak or overflow.

The flow equalization tank was full. Flows are pumped to the aeration system by two pumps. An electrical failure three weeks earlier caused both pumps to fail. Power was restored upon discovery. No overflow was reported. A moist spot was noted on the chlorine contact tank side of the equalization basin.

Two blowers provide air to the aeration system. One of the aeration blowers was down for repair. Mr. Bowman has been notified of the need to order a new motor. The aeration mixed liquor appeared thin.

The inlet baffle had a large amount of solids behind it. The clarifier effluent was clear. Fine solids were rising in the tank. Some clumps of solids were noted behind the effluent weir.

From clarification waste water enters the fixed media filter splitter box. The box splits flow between the two filters. The fixed media filters were clear to the media. The tanks were cleaned a week prior.

## Facility Inspection (cont.)

After the fixed media filters flow enters the sand filter dosing chamber. Plant flows are estimated based upon pump run times. There are two slow surface sand filters. One filter was on-line. Minor solids were noted on the surface of both filters. Both filters were drained. By restricting influent flows the problem with filters blinding has been reduced. The filter leaks noted on the distribution box wall and the wall separating the two filters have not been repaired. The leaks from the plastic waste bins also remained.

From the sand filters flow enters the chlorine contact tank. A tablet feed system is used to introduce chlorine. Post aeration also occurs in this tank. The effluent was clear. Next the waste water enters the dechlorination tank. A tablet dechlorination system is used to remove the chlorine. There weren't any dechlorination tablets in the dosing tube (tablets were added upon discovery).

Final effluent samples are collected after the dechlorination system. The final effluent was clear. The final outfall at the creek is about 125 yards away. We did not visit it today.

Robert Gomez is the Operator of Record for the plant. Mr. Gomez keeps a log book on-site. The book includes the system identification, dates and times of arrival and departure, identification of person making entries, specific O & M work performed, test results, and maintenance activities performed. Mr. Gomez also has developed a check list for the maintenance person to use. Mr. Gomez visits the plant once per week. The plant is currently classified as a Class I plant (minimum staffing 3 days per week, 1.5 hours per week). When the permit is renewed the plant will go to a Class A plant (minimum staffing 2 days per week, 1.0 hour per week). The minimum staffing requirements are not being met.

## Items Requiring a Response

1. The walls of the filters must be sealed to prevent the migration of waste water from the system. Additionally the waste solids container must be sealed to prevent leakage onto the ground. Written verification as to the completion of this work must be submitted to this office by no later than August 17, 2012.

## Items Requiring a Response (cont.)

2. Please provide an update as to the completion of the aeration blower motor repair by no later than August 17, 2012.
3. The treatment system must be under the responsible charge of a Class I operator (this requirement will switch to Class A as part of the NPDES renewal) in accordance with the staffing requirements contained in Ohio Administrative Code 3745 – 7 – 04, "Treatment works and sewage system classification and staffing requirements." A written response detailing how the minimum staffing requirements will be met, must be submitted to this office by no later than August 17, 2012.