40 years of moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail #91 7108 2133 3932 1838 1102

February 8, 2013

Shawn and David Blue, Owners
Blue Haven MHP
18219 Walnut Creek Pike
Circleville, OH 43113

NOTICE OF VIOLATION

Re: Blue Haven MHP
NPDES Permit 4PV00125/ OH0136476
Reconnaissance Inspection
Fairfield County

Dear Shawn and David Blue:

On February 4, 2013, a Reconnaissance Inspection was conducted at the Blue Haven MHP. Present for the inspection were David Blue, the owner of the mobile home park, 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. **This letter serves as a Notice of Violation because of habitual violations of your NPDES permit and a bypass as described below.**

Findings:

1. There was a sump pump in the dosing tank which pumped clarifier effluent to the ground near the U.V. disinfection tank (see attached photographs). Part III.11.A. states (emphasis added):

   "Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass…"

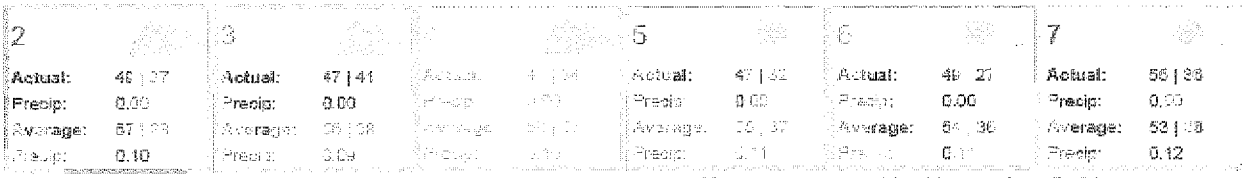
   The bypass of the sand filter is a violation of the permit. **Future bypasses of treatment systems will result in enforcement.**

2. Attached are compliance tables between January 1, 2011, and January 1, 2013. The facility completed upgrades in late 2011 which included installing tertiary sand filters and UV disinfection. The upgrades reduced the frequency of non-compliance but based on the recent high total suspended solids in November 2012 and December 2012, **the facility is in significant non-compliance again.** Continued non-compliance will result in enforcement.

3. Jim Bennett, the operator of record, has indicated to me that high inflow and infiltration is the cause of violations and that you have spoken with an engineer to re-work the sanitary sewers. **Please provide a schedule to reduce inflow and infiltration.**

4. The flow rates are currently based on the design flow of the facility. In order to determine inflow and infiltration reduction as well as accurately calculate loadings to the receiving stream, the facility must install a flow meter. **An hour meter or a suitable alternative must be installed on the dosing pumps by March 1, 2013.**

5. I have reviewed the weather preceding the November 7, 2012, suspended solids violation. There were no precipitation events recorded at Rickenbacker Airport on November 7, 2012, nor were there any precipitation events in the preceding 5 days. This indicates that sludge may not be wasted at a proper rate. **Please provide an explanation of how solids are handled by March 1, 2013.**



6. The permit requires that a marker be installed by the Outfall by February 1, 2007. I did not observe a marker. **Please install a marker as soon as possible as described in the NPDES permit Section II.J. Please provide photo via e-mail to me when complete.**

Enclosed is the inspection report. **A response is required by March 1, 2013.** I also request a meeting with you on-site to discuss the inspection report as well as your responses during the week of March 4, 2013.

Please be advised that failure to comply with the effluent limitations of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code 6111 which would include a financial penalty. 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.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 2-4-2013

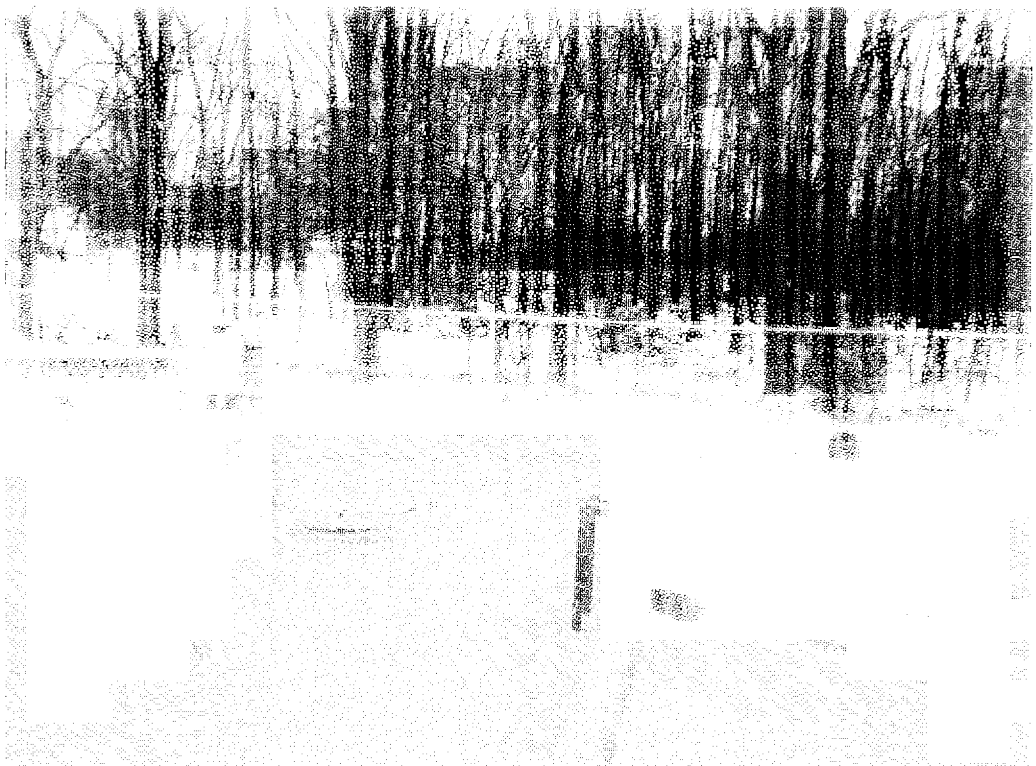


Figure 2: Black trees from dosing tank

Figure 3: Discharge of dye.

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	N. D. #	Inspection Type	Inspector	Facility Type
4PV00125	OH0136476	RI	S	2

Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
2/4/13	10:15 AM	10:30 AM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Blue Haven MHP	10/1/2007
	Permit Expiration Date
	9/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
David Blue	
Name and Title of Responsible Official	Phone Number
Shawn and David Blue, Owners	(740) 248-6400

SECTION C. AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Significant Non-Compliance, marker must be installed at outfall
U	Operations & Maintenance	Bypass of the sand filters.
N	Facility Site Review	Inspection done from outside the perimeter fence.
U*	Collection System	Operator has indicated that I&I is an issue.
U	Flow Measurement	Flow is estimated.
S	Receiving Waters	
N	Laboratory	

Comments: A response addressing all issues noted in this letter is required by March 1, 2013.

Signatures	
Cole Miller 2/6/13	Erin Sherer 2/7/13
Cole Miller, Inspector Date Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Date Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Blue Haven MHP between 1/1/2011 to 1/1/2013

Summary
Permit Effluent Limit Violations: 127
Permit Effluent Code Violations: 0
Permit Effluent Frequency Violations: 0
Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2011	001	Total Suspended Solids	30D Conc	12	44.	1/1/2011
January 2011	001	Total Suspended Solids	30D Qty	0.23	.49795	1/1/2011
January 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.7	1/1/2011
January 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.06	.13241	1/1/2011
January 2011	001	CBOD 5 day	30D Conc	10	30.	1/1/2011
January 2011	001	CBOD 5 day	30D Qty	0.19	.33951	1/1/2011
January 2011	001	Total Suspended Solids	1D Conc	18	44.	1/3/2011
January 2011	001	Total Suspended Solids	1D Qty	0.34	.49795	1/3/2011
January 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	11.7	1/3/2011
January 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.09	.13241	1/3/2011
January 2011	001	CBOD 5 day	1D Conc	15	30.	1/3/2011
January 2011	001	CBOD 5 day	1D Qty	0.28	.33951	1/3/2011
February 2011	001	CBOD 5 day	30D Qty	0.19	.93932	2/1/2011
February 2011	001	Total Suspended Solids	30D Conc	12	77.	2/1/2011
February 2011	001	Total Suspended Solids	30D Qty	0.23	.87142	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	7.2	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.06	.08148	2/1/2011
February 2011	001	CBOD 5 day	30D Conc	10	83.	2/1/2011

February 2011	001	CBOD 5 day	1D Qty	0.28	.93932	2/21/2011
February 2011	001	Total Suspended Solids	1D Conc	18	77.	2/21/2011
February 2011	001	Total Suspended Solids	1D Qty	0.34	.87142	2/21/2011
February 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	7.2	2/21/2011
February 2011	001	CBOD 5 day	1D Conc	15	83.	2/21/2011
March 2011	001	Total Suspended Solids	30D Conc	12	13.	3/1/2011
March 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.6	3/1/2011
March 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	4.6	3/7/2011
April 2011	001	Total Suspended Solids	30D Conc	12	190.	4/1/2011
April 2011	001	Total Suspended Solids	30D Qty	0.23	2.15026	4/1/2011
April 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.2	4/1/2011
April 2011	001	CBOD 5 day	30D Conc	10	100.	4/1/2011
April 2011	001	CBOD 5 day	30D Qty	0.19	1.13172	4/1/2011
April 2011	001	Total Suspended Solids	1D Conc	18	190.	4/11/2011
April 2011	001	Total Suspended Solids	1D Qty	0.34	2.15026	4/11/2011
April 2011	001	CBOD 5 day	1D Conc	15	100.	4/11/2011
April 2011	001	CBOD 5 day	1D Qty	0.28	1.13172	4/11/2011
May 2011	001	Total Suspended Solids	30D Conc	12	25.	5/1/2011
May 2011	001	Total Suspended Solids	30D Qty	0.23	.28293	5/1/2011
May 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	4.2	5/1/2011
May 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.02	.04753	5/1/2011
May 2011	001	CBOD 5 day	30D Conc	10	25.	5/1/2011
May 2011	001	CBOD 5 day	30D Qty	0.19	.28293	5/1/2011
May 2011	001	Total Suspended Solids	1D Conc	18	25.	5/24/2011
May 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	4.2	5/24/2011
May 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.03	.04753	5/24/2011
May 2011	001	CBOD 5 day	1D Conc	15	25.	5/24/2011
May 2011	001	CBOD 5 day	1D Qty	0.28	.28293	5/24/2011
June 2011	001	Total Suspended Solids	30D Conc	12	40.	6/1/2011
June 2011	001	Total Suspended Solids	30D Qty	0.23	.45269	6/1/2011
June 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	12.	6/1/2011

June 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.02	.13581	6/1/2011
June 2011	001	CBOD 5 day	30D Conc	10	58.	6/1/2011
June 2011	001	CBOD 5 day	30D Qty	0.19	.65639	6/1/2011
June 2011	001	Total Suspended Solids	1D Conc	18	40.	6/28/2011
June 2011	001	Total Suspended Solids	1D Qty	0.34	.45269	6/28/2011
June 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	12.	6/28/2011
June 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.03	.13581	6/28/2011
June 2011	001	CBOD 5 day	1D Conc	15	58.	6/28/2011
June 2011	001	CBOD 5 day	1D Qty	0.28	.65639	6/28/2011
July 2011	001	Total Suspended Solids	30D Conc	12	23.	7/1/2011
July 2011	001	Total Suspended Solids	30D Qty	0.23	.25246	7/1/2011
July 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	11.	7/1/2011
July 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.02	.12074	7/1/2011
July 2011	001	Total Suspended Solids	1D Conc	18	23.	7/26/2011
July 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	11.	7/26/2011
July 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.03	.12074	7/26/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	8.	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.02	.08781	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	8.	8/30/2011
August 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.03	.08781	8/30/2011
September 2011	001	Total Suspended Solids	30D Conc	12	50.	9/1/2011
September 2011	001	Total Suspended Solids	30D Qty	0.23	.5[illegible]	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.4	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.02	.03732	9/1/2011
September 2011	001	CBOD 5 day	30D Conc	10	28.	9/1/2011
September 2011	001	CBOD 5 day	30D Qty	0.19	.30734	9/1/2011
September 2011	001	Total Suspended Solids	1D Conc	18	50.	9/27/2011
September 2011	001	Total Suspended Solids	1D Qty	0.34	.54883	9/27/2011
September 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	3.4	9/27/2011
September 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.03	.03732	9/27/2011
September 2011	001	CBOD 5 day	1D Conc	15	28.	9/27/2011

September 2011	001	CBOD 5 day	1D Qty	0.28	.30734	9/27/2011
October 2011	001	Total Suspended Solids	30D Conc	12	15.	10/1/2011
October 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	15.	10/1/2011
October 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.02	.16465	10/1/2011
October 2011	001	CBOD 5 day	30D Conc	10	18.	10/1/2011
October 2011	001	CBOD 5 day	30D Qty	0.19	.19758	10/1/2011
October 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	15.	10/25/2011
October 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.03	.16465	10/25/2011
October 2011	001	CBOD 5 day	1D Conc	15	18.	10/25/2011
November 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	7.5	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.06	.08488	11/1/2011
November 2011	001	CBOD 5 day	30D Conc	10	14.	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	7.5	11/28/2011
December 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	18.	12/1/2011
December 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.06	.20371	12/1/2011
December 2011	001	CBOD 5 day	30D Conc	10	17.	12/1/2011
December 2011	001	CBOD 5 day	30D Qty	0.19	.19239	12/1/2011
December 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	18.	12/19/2011
December 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.09	.20371	12/19/2011
December 2011	001	CBOD 5 day	1D Conc	15	17.	12/19/2011
January 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.	1/1/2012
January 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.	1/2/2012
March 2012	001	Total Suspended Solids	30D Conc	12	15.	3/1/2012
April 2012	001	Total Suspended Solids	30D Conc	12	70.	4/1/2012
April 2012	001	Total Suspended Solids	30D Qty	0.23	.7922	4/1/2012
April 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.	4/1/2012
April 2012	001	CBOD 5 day	30D Conc	10	11.	4/1/2012
April 2012	001	Total Suspended Solids	1D Conc	18	70.	4/16/2012
April 2012	001	Total Suspended Solids	1D Qty	0.34	.7922	4/16/2012
April 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.	4/16/2012
September 2012	001	Fecal Coliform	30D Conc	1000	5600.	9/1/2012

September 2012	001	Fecal Coliform	1D Conc	2000	5600.	9/17/2012
November 2012	001	Total Suspended Solids	30D Conc	12	105.	11/1/2012
November 2012	001	Total Suspended Solids	30D Qty	0.23	1.1883	11/1/2012
November 2012	001	Total Suspended Solids	1D Conc	18	105.	11/7/2012
November 2012	001	Total Suspended Solids	1D Qty	0.34	1.1883	11/7/2012
December 2012	001	Total Suspended Solids	30D Conc	12	44.	12/1/2012
December 2012	001	Total Suspended Solids	30D Qty	0.23	.49795	12/1/2012
December 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	22.	12/1/2012
December 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.06	.24898	12/1/2012
December 2012	001	CBOD 5 day	30D Conc	10	22.	12/1/2012
December 2012	001	CBOD 5 day	30D Qty	0.19	.24898	12/1/2012
December 2012	001	Total Suspended Solids	1D Conc	18	44.	12/26/2012
December 2012	001	Total Suspended Solids	1D Qty	0.34	.49795	12/26/2012
December 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	22.	12/26/2012
December 2012	001	Nitrogen, Ammonia (NH3	1D Qty	0.09	.24898	12/26/2012
December 2012	001	CBOD 5 day	1D Conc	15	22.	12/26/2012

Flow Data for Blue Haven MHP between 1/1/2011 and 1/1/2013

	Date	Flows (GPD)
Ten Highest Flows	1/1/2011	2990
	1/2/2011	2990
	1/3/2011	2990
	1/4/2011	2990
	1/5/2011	2990
	1/6/2011	2990
	1/7/2011	2990
	1/8/2011	2990
	1/9/2011	2990

	1/10/2011	2990
Average Flow Rate		2924