



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

May 14, 2013

**Re:** Athens County  
Happy Valley Estates MHP  
Compliance Inspection  
OPV00531\*BD  
Correspondence (PWW)

Mr. Elsea, President  
Elsea, Inc.  
P.O. Box 580  
Circleville, Ohio 43113

Dear Mr. Elsea:

On May 2, 2013, I conducted a compliance evaluation inspection at the Happy Valley Estates MHP Wastewater Treatment Plant (WWTP). The purpose of the inspection was to determine why monthly Discharge Monitoring Reports (DMRs) were not being submitted and to determine compliance with terms and conditions set forth in facility's NPDES Permit OPV00531\*BD. Mark Little, newly hired operator, was present during the inspection.

Based on the inspection and file review, the facility was found to be in **non-compliance** with the permit on the day of the inspection.

As a result of the inspection, I have the following comments:

1. A review of your DMRs from April 2012 to April 2013 indicates you have not submitted reports for the months of February 2013 and March 2013. If samples were taken, you need to submit this data immediately through the eDMR system.
2. **NPDES Permit Part III, Item 3 - Plant Operation and Maintenance:** The permittee is required to maintain in good working order and operate as efficiently as possible the "treatment works" and "sewerage system" as defined in ORC 6111.01 to achieve compliance with the terms and conditions of this permit and to prevent discharges to the waters of the state, surface of the ground, etc.
  - a. The influent pump station was full of a large amount of solids. It appears that this pump station overflows on a regular basis based on the sewage debris in the riser and around the opening of the tank.
  - b. The third aeration tank in series currently is not receiving any air to the diffusers. Air could be heard leaving the line before it enters the aeration

chamber. You must immediately determine the cause of this malfunction and repair.

- c. The mixed liquid suspended solids (MLSS) appeared light gray and very thin. It is my understanding that a large portion of sludge was recently removed from the plant. Due to removing this sludge and the continued issued of Inflow/Infiltration (I/I), the MLSS is very weak. The sludge return from the clarifier is currently clear. For proper removal of contaminants to occur, a healthy MLSS is required.
  - d. The weirs in the clarifier contained sludge and were not level. The weirs need to be hosed down regularly to remove any accumulation of solids and you must immediately level the weirs. The skimmers were operating however, there was a build-up of solids on them and were not operating at full capacity. Clean skimmers to allow them to function at full capacity.
  - e. Both sand filters were in extremely poor condition. The south sand filter was completely full of effluent and effluent was overflowing from the sand filter to the ground. There was a large amount of effluent pooling around the sand filters and along the fence line. The north sand filter was currently not in use, however, a large amount of sludge is on top of the sand filter. Sand filters are not designed to receive sludge. Once the sand becomes fouled with sludge, the sand filter stops functioning and the sand must be replaced. A bypass report needs to be submitted to the Ohio EPA anytime the sand filters overflow.
  - f. As mentioned in previous inspection letters between Ohio EPA and the facility, the collection system suffers from I/I. When large rain events occur, the additional flow into the plant causes solids to exit the clarifier and deposit onto the sand filters. Until I/I is reduced, the plant will continue to have operational problems. Submit a report on all action taken to date, to identify and reduce I/I. In addition, you shall submit a plan (with timeframes) to address the remaining sources/locations of I/I to my attention within **thirty (30) days** from the date of this letter.
3. **NPDES Permit Part III, 3 - Schedule of Compliance:** Your NPDES permit contains a schedule of compliance for sewer system improvements in order to comply with the effluent limits contained in the NPDES permit. To date you have not complied with this requirement.

Your facility has been in significant non-compliance for the past several years. Based on the condition of the plant, and the proximity to occupied mobile homes with many children as residents, we are concerned about the health and safety of your residents.

Ohio EPA is requesting a meeting at the site with you on **May 29, 2013 at 10:00 am.**  
Please contact me as soon as possible to verify your availability.

Please address and provide a response to items #1 through 3 within **thirty (30) days**  
upon receipt of this letter.

Attached is a copy of the inspection report. If you have any questions, please contact  
me at (740) 380-5416 or by email at [nick.hammer@epa.ohio.gov](mailto:nick.hammer@epa.ohio.gov).

Sincerely,



Nicholas G. Hammer  
Environmental Specialist  
Division of Surface Water

NH/dh

Enclosure

cc: Mark Little, Operator



State of Ohio Environmental Protection Agency  
Southeast District Office

Semi-Public NPDES Compliance Inspection Report

| Section A: National Data System Coding |           |                |                 |           |               |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit #                               | NPDES #   | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 0PV00531*BD                            | OH0127973 | May 2, 2013    | C               | S         | 1             |

| Section B: Facility Data   |                 |                        |
|--|-----------------|------------------------|
| Name and Location of Facility Inspected  | Entry Time      | Permit Effective Date  |
| Elsea, Inc.<br>dba Happy Valley Estates MHP<br>6800 Baker Road<br>Athens, Ohio 45701 | 2:20 pm         | September 1, 2007      |
|  | Exit Time       | Permit Expiration Date |
|  | 3:40 pm         | August 31, 2012        |
| Name(s) and Title(s) of On-Site Representatives                                      | Phone Number(s) |                        |
| Mark Little, Operator  | (740) 418-3067  |                        |
| Name(s), Address and Title(s) of Operator of Record                                  | Phone Number(s) |                        |
| Mark Little, Operator  | (740) 418-3067  |                        |
| Name, Address, and Title of Responsible Official                                     | Phone Number    |                        |
| Asa Elsea, President<br>P.O. Box 580<br>Circleville, Ohio 43113                      | (740) 474-5710  |                        |

| Section D: Summary of Findings (attach additional sheets if necessary)              |         |   |         |
|---|---------|---|---------|
| See attached letter.  |         |   |         |
| Inspector   |         | Reviewer  |         |
|  | 5-14-13 |                                       | 5/14/13 |
| <b>Nicholas G. Hammer</b><br>Division of Surface Water<br>Southeast District Office | Date    | <b>Jennifer M. Witte</b><br>Compliance & Enforcement Supervisor<br>Division of Surface Water<br>Southeast District Office | Date    |

|                            |  |
|----------------------------|--|
| Average Daily Design Flow: | <b>14,000 Gallons/Day</b>                  |
| Plant Serves:              | <b>Mobile Home Park</b>                    |
| Average Daily Flow:        | <b>9,000 Gallons/Day</b>                   |
| (Period of Review):        | <b>(April 2012 through January 2013)</b>   |
| Method of flow monitoring: | Calculated from dosing pump run time       |
| Type of alarms for plant:  | Audio and Visual on Influent Pump Station. |

### Pretreatment

Type of Pretreatment: **Other**  
 Does the Trash Trap need pumped: **Yes**  
 Maintenance of pretreatment components is: **Poor**

**Comments/Status:**

Influent pump station contains many solids. Solids are observed in the riser of the tank and alongside the tank, indicating recent overflow.

### Secondary Treatment (Aeration)

Color of sludge: **Gray**  
 Quality of sludge: **Thin**  
 Foam: **None Present**  
 Odor: **Strong**

|                            | Yes                                 | No                       |                        | Yes                                 | No                                  |
|----------------------------|-------------------------------------|--------------------------|------------------------|-------------------------------------|-------------------------------------|
| Aeration is taking place   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Plant is septic        | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Blowers are operating      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Blowers are on a timer | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Skimmers are operating     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Plant is flooded       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Diffusers are operating    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Grating is present     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| Sludge return is operating | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                        |                                     |                                     |

Maintenance of aerating equipment is: **Poor**

**Comments/Status:**

Aeration Tank #3 does not have any air going to tank.  
 Sludge return is clear

### Secondary Treatment (Settling)

Clarity: **Solids Present**  
 Condition of Weir: **Solids Build Up**  
 Weir is level: **No**  
 Effluent in weir: **Light Solids**  
 Clarifier walls need scraped: **Yes**

Overall maintenance of settling components is: **Poor**

**Comments/Status:**

Solids floating on clarifier surface. Skimmer needs solids removed.

### Tertiary Treatment

|                                   | Yes                                 | No                                  |                        | Yes                                 | No                                  |
|-----------------------------------|-------------------------------------|-------------------------------------|------------------------|-------------------------------------|-------------------------------------|
| Surface sand filters: <b>Slow</b> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |                        | <input type="checkbox"/>            | <input type="checkbox"/>            |
| Distribution box operating        | <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 type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Sand filters overgrown            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Chlorination present   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| UV present                        | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Dechlorination present | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

Overall maintenance of settling components is: **Poor**

**Comments/Status:**

South sandfilter is completely full of effluent and overflowing to the ground.  
 North sandfilter is full of solids.

### Sludge Handling/Storage Disposal

Hauler name: Traces Sanitation  
 Disposal site: Rustic Ridge MHP  
 Sludge wasted from: See below  
 How often is sludge wasted: Unknown  
 Sludge drying beds: **No**      Sludge holding tank: **Yes**

Overall maintenance of settling components is: **Fair**

**Comments/Status:**

Sludge was wasted on April 18, 2013. 7,000 gallons of liquid sludge was pumped from sludge holding tank, clarifier, chlorine contact tank, and influent pump station. Sludge was taken to another NPDES facility. Currently the sludge holding tank is holding rain water. Operator checked with sludge judge and no sludge in tank.

### Record Keeping/Operator of Record

- |  |     |
|--|-----|
| (a) Wastewater Treatment Works classification (OAC 3745-7) .....   | 1   |
| (b) Operator of Record holds unexpired license of class required by Permit .....   | Y   |
| (c) Copy of certificate of Operator of Record displayed on-site .....  | N   |
| (d) Has the Operator of Record submitted an ORC Notification form.....   | N   |
| (e) Minimum operator staffing requirements fulfilled (OAC 3745-7) .....  | N   |
| (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met .....   | N/A |
| (g) Operator of Record log book provided.....  | Y   |
| (h) Format of log book (e.g. computer log, hard bound book)  |     |
| <b>Hard Bound Book</b>   |     |
| (i) Log book kept onsite (in an area protected from weather) .....   | Y   |
| (j) Log book contains the following:   |     |
| I. Identification of treatment works.....  | Y   |
| II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 .....   | Y   |
| III. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.) .....   | Y   |
| IV. Laboratory results (unless documented on bench sheets) .....   | Y   |
| V. Identification of person making entries.....  | Y   |
| (k) 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..... | N   |

**Comments/Status:**

Sandfilter was overflowing at time of inspection and appeared to be overflowing for a extended period of time.

### Plant Discharge

Discharge point is a:                   **Stream**  
 Name of discharge point:           **West Branch of Margaret Creek**  
 Discharge is visible:               **Yes**  
 Quality of Effluent:                 **Clear**

**Comments/Status:**

