



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

**Certified Mail #91 7108 2133 3932 1838 1478**

May 16, 2013

Paul Barlows, Regional Manager  
Hayden Heights MHP  
P.O. Box 1498  
Fenton, MO 63026

**NOTICE OF VIOLATION**

**Re: Hayden Heights MHP  
NPDES Permit 4PV00110/ OH0136051  
Semi-Public CEI  
Franklin County**

Dear Mr. Barlows:

On May 7, 2013, a Semi-Public CEI was conducted at the Hayden Heights MHP. Present for the inspection were Pat Hickman, the operator of record, Elmer, the daily 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.

This letter serves as a **Notice of Violation** due to the habitual permit violations.

**Findings:**

1. The preliminary treatment consists of a basket for solids screenings and a grinder influent pump (see **Figure 1**).
2. The aeration tanks had stagnant foam collecting on the tank sides opposite of the diffuser location (see **Figure 2**). I requested that Mr. Hickman reduce the throttling of the diffuser valves to increase aeration and mixing. **Please inform me when aeration has increased.**
3. An unofficial settleability test was performed on the mixed liquor (see **Figure 3** and **Figure 4**). The sludge had very slow settling characteristics. It's unclear whether the slow settleability was due to filamentous bacteria or too much biomass, **but additional wasting frequency will likely produce a better settling mixed liquor.**

4. The operator adds 4 chlorine tablets daily at the sand filter distribution box (see **Figure 5** and **Figure 6**). The poor settleability of the sludge increases the amount of solids which can increase chlorine demand. There is higher potential that bacteria standards will be exceeded due to the increase of solids. **Please increase wasting and investigate adding additional chlorine.** Note that additional chlorine will require additional dechlorination chemicals to be used as well.
5. Three of the sand beds were ponded with an additional sand bed ready to be raked (see **Figure 7**). This indicates that solids are not removed from the system enough. **Please increase wasting to prevent solids deposition on sand filters.**
6. Hayden Heights MHP was purchased by your group on December 19, 2012. Our records indicate that the permit has not been transferred to your company. **Please submit the enclosed form and submit it by June 15, 2013.**
7. Attached are compliance tables since August 2012. The facility has consistently violated permit limits and is currently in significant non-compliance. Ohio EPA recognizes there is new ownership but note that **non-compliance with the NPDES permit can result in enforcement which can include a monetary penalty.**
8. Mr. Hickman worked with Ohio EPA's Compliance Assistance Unit in addition to installing equipment upgrades in September and October 2012. While effluent quality had improved, there were reported violations in March 2013. Mr. Hickman indicated that the results were due to electricity being turned off due to billing issues with the electricity company. Mr. Hickman has provided the results of 3 samples from April 2013 which were below permitted effluent limits.
9. The permit expires January 31, 2014. A renewal application is required 180 days prior to expiration date which would be August 4, 2013. I have also enclosed the permit application forms.

Attached is the inspection checklist. **A response is requested by June 15, 2013.** 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](mailto:cole.miller@epa.state.oh.us).

Sincerely,



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

ec: Cole Miller



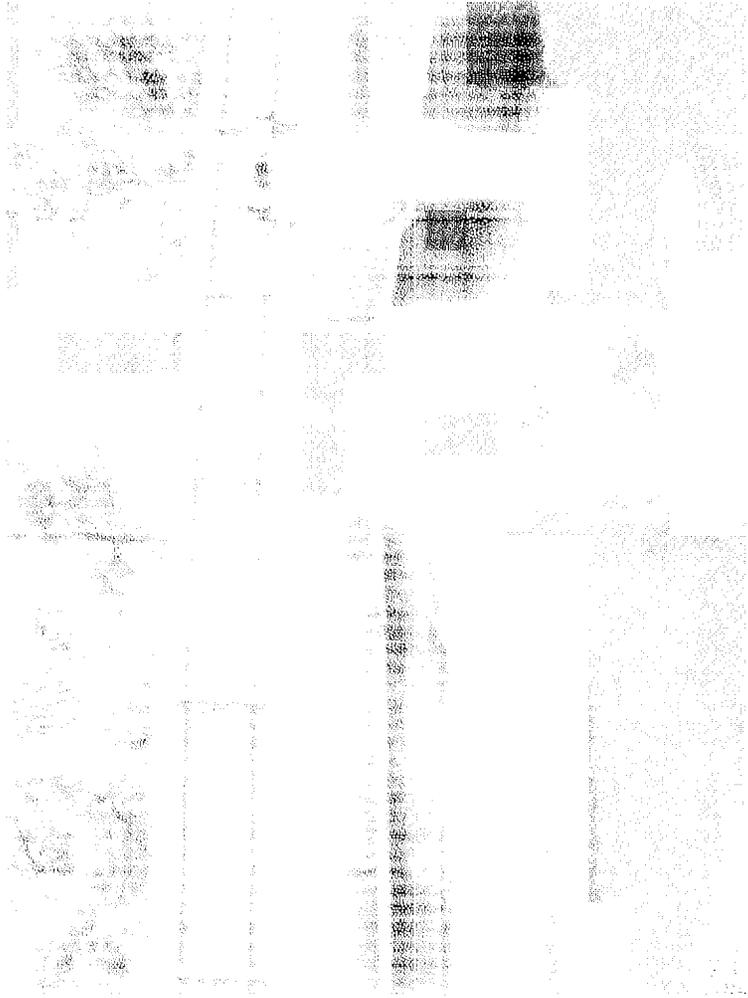


Figure 3

Continued...



Figure 4

...the setting has occurred.

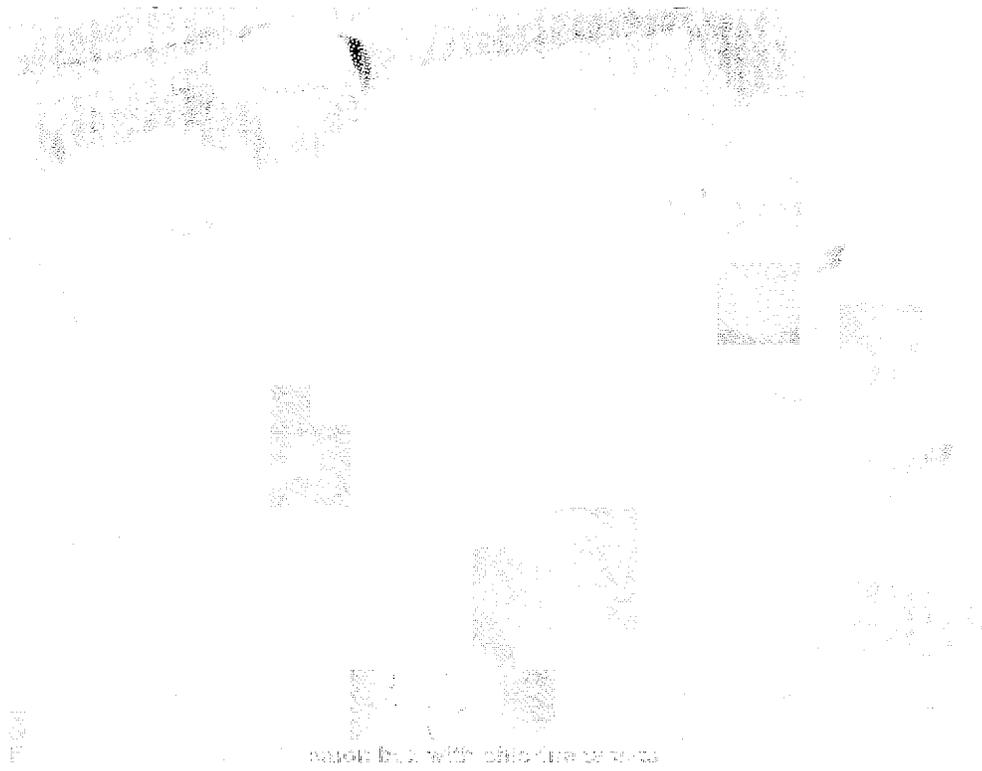


Figure 1



Figure 2

[REDACTED]

[REDACTED]

NPDES Compliance Inspection Report

SECTION A: IDENTIFICATION DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PV00110	OH0136051	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/7/2013	10:30 AM	11:15 AM	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
Daniel Williamson, Owner	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Failure to transfer permit
M	Operations & Maintenance	Facility would likely benefit from additional wasting.
M	Facility Site Review	Sand filters were ponded
N	Collection System	
S	Flow Measurement	
U	Receiving Waters	Effluent violations.
N	Laboratory	

Comments:

Signatures	
 5/8/13	 5/13/13
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water District Office

## Compliance Data for Hayden Heights MHP between 8/1/2012 to 4/1/2013

### Summary

Permit Effluent Limit Violations: 78  
 Permit Effluent Code Violations: 2  
 Permit Effluent Frequency Violations: 0  
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2012	001	Total Suspended Solids	30D Conc	12	25.25	8/1/2012
August 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	31.	8/1/2012
August 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	0.15	2.09205	8/1/2012
August 2012	001	Dissolved Oxygen	1D Conc	6.0	4.9	8/6/2012
August 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	19.6	8/8/2012
August 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	0.23	1.82498	8/8/2012
August 2012	001	Total Suspended Solids	7D Conc	18	61.	8/15/2012
August 2012	001	Total Suspended Solids	7D Qty	2.7	3.39401	8/15/2012
August 2012	001	Total Suspended Solids	7D Conc	18	20.	8/22/2012
August 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	42.4	8/22/2012
August 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	0.23	2.35911	8/22/2012
August 2012	001	Dissolved Oxygen	1D Conc	6.0	5.6	8/27/2012
September 2012	001	Total Suspended Solids	30D Conc	12	35.	9/1/2012
September 2012	001	Total Suspended Solids	7D Conc	18	30.	9/1/2012
September 2012	001	Total Suspended Solids	30D Qty	1.8	1.92089	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	39.45	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	0.15	2.51008	9/1/2012
September 2012	001	CBOD 5 day	30D Conc	10	21.75	9/1/2012

September 2012	001	Dissolved Oxygen	1D Conc	6.0	4.2	9/4/2012
September 2012	001	Total Suspended Solids	7D Conc	18	38.	9/8/2012
September 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	37.2	9/8/2012
September 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	2.73156	9/8/2012
September 2012	001	Dissolved Oxygen	1D Conc	6.0	1.	9/9/2012
September 2012	001	Total Suspended Solids	7D Conc	18	36.	9/15/2012
September 2012	001	CBOD 5 day	7D Conc	15	32.	9/15/2012
September 2012	001	Total Suspended Solids	7D Conc	18	36.	9/22/2012
September 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	41.7	9/22/2012
September 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	2.2886	9/22/2012
September 2012	001	CBOD 5 day	7D Conc	15	34.	9/22/2012
September 2012	001	Dissolved Oxygen	1D Conc	6.0	1.8	9/24/2012
October 2012	001	Total Suspended Solids	30D Conc	12	26.	10/1/2012
October 2012	001	Total Suspended Solids	7D Conc	18	29.	10/1/2012
October 2012	001	Total Suspended Solids	30D Qty	1.8	2.10128	10/1/2012
October 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	30.8	10/1/2012
October 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	45.2	10/1/2012
October 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.15	2.29665	10/1/2012
October 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	3.35321	10/1/2012
October 2012	001	CBOD 5 day	30D Conc	10	23.2	10/1/2012
October 2012	001	CBOD 5 day	7D Conc	15	18.	10/1/2012
October 2012	001	CBOD 5 day	30D Qty	1.5	1.85223	10/1/2012
October 2012	001	Total Suspended Solids	7D Conc	18	28.	10/8/2012
October 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	22.9	10/8/2012
October 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	1.27414	10/8/2012
October 2012	001	CBOD 5 day	7D Conc	15	32.	10/8/2012
October 2012	001	Total Suspended Solids	7D Conc	18	27.	10/15/2012
October 2012	001	CBOD 5 day	7D Conc	15	33.	10/15/2012
October 2012	001	CBOD 5 day	7D Qty	2.3	3.07266	10/15/2012
October 2012	001	Total Suspended Solids	7D Conc	18	24.	10/22/2012
October 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	24.3	10/22/2012

October 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.23	2.2626	10/22/2012
October 2012	001	CBOD 5 day	7D Conc	15	21.	10/22/2012
November 2012	001	Total Suspended Solids	30D Conc	12	16.75	11/1/2012
November 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	25.35	11/1/2012
November 2012	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	22.1	11/1/2012
November 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.45	2.97592	11/1/2012
November 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.68	3.61362	11/1/2012
November 2012	001	CBOD 5 day	30D Conc	10	11.75	11/1/2012
November 2012	001	Total Suspended Solids	7D Conc	18	31.	11/15/2012
November 2012	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	28.6	11/15/2012
November 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.68	2.33822	11/15/2012
November 2012	001	CBOD 5 day	7D Conc	15	17.	11/15/2012
December 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	12.5	12/1/2012
December 2012	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	23.4	12/1/2012
December 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.45	.7201	12/1/2012
December 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.68	1.31968	12/1/2012
December 2012	001	CBOD 5 day	30D Conc	10	11.	12/1/2012
December 2012	001	CBOD 5 day	7D Conc	15	26.	12/1/2012
March 2013	001	Total Suspended Solids	30D Conc	12	73.75	3/1/2013
March 2013	001	Total Suspended Solids	7D Conc	18	244.	3/1/2013
March 2013	001	Total Suspended Solids	30D Qty	1.8	6.19983	3/1/2013
March 2013	001	Total Suspended Solids	7D Qty	2.7	20.7796	3/1/2013
March 2013	001	CBOD 5 day	30D Conc	10	31.	3/1/2013
March 2013	001	CBOD 5 day	7D Conc	15	91.	3/1/2013
March 2013	001	CBOD 5 day	30D Qty	1.5	2.58894	3/1/2013
March 2013	001	CBOD 5 day	7D Qty	2.3	7.74979	3/1/2013
March 2013	001	Total Suspended Solids	7D Conc	18	24.	3/8/2013
March 2013	001	Total Suspended Solids	7D Conc	18	23.	3/15/2013
March 2013	001	CBOD 5 day	7D Conc	15	16.	3/15/2013

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
September 2012	001	Fecal Coliform	AK	9/4/2012
October 2012	001	Fecal Coliform	AK	10/1/2012

Flow Data for Hayden Heights MHP between 8/1/2012 and 4/1/2013

	Date	Flows (MGD)
Ten Highest Flows	1/14/2013	0.049
	11/5/2012	0.043
	3/3/2013	0.041
	1/16/2013	0.039
	11/3/2012	0.038
	12/30/2012	0.035
	12/13/2012	0.035
	12/21/2012	0.035
	12/27/2012	0.035
	2/8/2013	0.034
<b>Average Flow Rate</b>		0.022

Method of flow monitoring:	Hour meter on dosing pumps
Type of alarms for plant:	Visual

**SECTION D: PRELIMINARY TREATMENT**

Type of Preliminary Treatment? Grinder pump and basket		
Does the unit require pumping or cleaning?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Maintenance of preliminary treatment is satisfactory?	<input type="checkbox"/>	<input type="checkbox"/>

Comments/Status:

The preliminary treatment is limited to baskets to screen the influent from the grinder pumps.

**SECTION E: AERATION**

Color of MLSS?	Bark brown to black brown				
	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 operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Skimmers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sludge return is operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Foam present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overall maintenance satisfactory?	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Maintenance of aerating equipment is satisfactory.

Comments/Status:

There was a slight sewage odor around the aerators which may have been due to the sludge drying beds. The sludge settled very slowly and may have too much filamentous bacteria.

**SECTION F: CLARIFIERS**

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

Comments/Status: Sludge is settling very slowly.

**SECTION C: TERTIARY TREATMENT**

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

Comments/Status:

Three sand filters were ponded.

4 chlorine tablets added daily to the distribution box. However, this may not be adequate due to the tablets constantly being in water.

**SECTION H: SLUDGE HANDLING / STORAGE DISPOSAL**

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

Comments/Status:

**SECTION I: RECORD KEEPING / OPERATOR OF RECORD**

	Yes	No
Operator of Record holds unexpired license of class required by Permit?	X	
Has the Operator of Record submitted an ORC Notification form?	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	Computer log	Bound book

Comments/Status:

**SECTION J: PLANT DISCHARGE**

Discharge point is:	Tile
Discharge is visible:	Y
Name of discharge point:	Hayden Run
Marker present:	No
Quality of effluent:	Clear
Contract laboratory:	MASI

Comments/Status