



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

July 11, 2013

Mr. Alex Reck
5385 Croft Mill Road
Bradford, Ohio 45308

CERTIFIED LETTER

**RE: Hidden Valley MHP - NPDES No. 1PV00037/OH0040657
Compliance Evaluation Inspection – Shelby County
Notice of Violation**

Dear Mr. Reck:

On June 21, 2013, Sandra Leibfritz conducted an inspection at Hidden Valley MHP located at 5880 State Route 29 East, Sidney, Ohio. Lenard Lutz represented the park. The clarifier, aeration tank, slow surface sand filters and sludge handling/disposal facilities were rated as marginal due to excessive solids in the plant. The operations and maintenance area was rated as unsatisfactory due to the general condition of the plant. All other areas that were evaluated were rated as satisfactory. An inspection report for the facility is enclosed.

During the inspection, Ms. Leibfritz observed dark brown solids in the aeration tank and bulking solids in the clarifier. This is indicative of old age sludge. The RAS line was returning very few solids back to the aeration tank. There was a layer of solids on one of the sand filter beds with weeds at least knee high. This is a result of solids loss over the weir. The other sand filter was recently weeded and raked free of solids. The operator reported that they wasted solids when needed with no set schedule, and that wasting was last done in April 2013 and on June 26, 2013. The sludge holding tank contained very few solids.

The operator also reported that solids have never been hauled off-site because there has not been a need. In reviewing Hidden Valley's Annual Sewage Sludge Reports, sludge has not been removed for disposal from the plant since 2007. Solids management is lacking at Hidden Valley MHP even though it is an integral part of properly operating and maintaining any wastewater treatment plant. Ohio EPA would point out that solids are being removed from the plant when the solids/sand mixture is removed from the sand filters and disposed of in a dumpster.

No later than August 5, 2013, Hidden Valley MHP shall develop, implement and submit a written plan for process control methods (i.e., MLSS, F/M ratio, sludge return rate, settelometer, centrifuge, etc.) at the plant to determine when and how much solids need to be wasted to the sludge holding tank. All process control information must be recorded in the operator's log book.

Hidden Valley MHP is in violation of Part II, Item D for failure to maintain the sand filters in “good working order” due to solids build-up and weeds in the filters. Failure to do so can lead to violations (e.g., final effluent limits and bypass of treatment) of your NPDES permit. No later than August 5, 2013, provide written notification that the solids and weeds were removed from both filters and that the sand was replaced to a depth of 18 inches.

Hidden Valley MHP is in violation of Part II, Item D for failure to maintain the alarm system in “good working order”. No later than August 5, 2013, provide written notification that the audio portion of the alarm was repaired and can be heard above the noise that the blowers make.

The operator certification was not on display during the inspection, which violates Ohio Administrative Code 3745-7-05(C). The operator reported that it was on-site, but was covered up by something else. Ohio EPA recommends that the operator certification be kept in the operator’s log book or placed in a clear plastic sleeve and tacked to the wall of the shed.

Ohio EPA also received a sewage odor complaint emanating from your plant. We have received similar complaints in previous years. During the inspection, Ms. Leibfritz did smell a faint odor of raw sewage at the road from your plant. Ohio EPA acknowledges that these complaints are mainly due to lack of isolation distance. The odors are most likely from your equalization basin. We would recommend using rigid foam board in your grating to help reduce the odors.

After August 5, 2013, Ms. Leibfritz will inspect the plant to ensure that the above-mentioned issues have been addressed. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,



Joe Miller
Environmental Supervisor
Division of Surface Water

JM/tb

ec: Robin Reck, Operator of Record

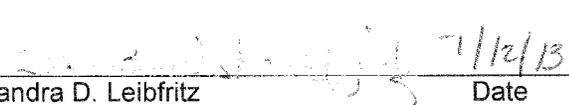
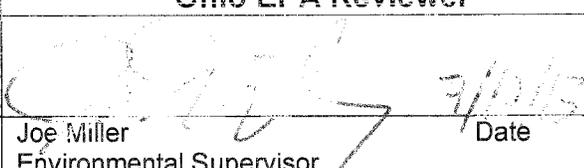


State of Ohio Environmental Protection Agency
 Southwest District Office

NPDES Compliance Inspection Report
 Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00037*BD	OH0040657	06/21/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Hidden Valley Mobile Home Park 5880 State Route 29 East Sidney, Ohio	11:00 AM	April 1, 2010
	Exit Time	Permit Expiration Date
	12:10 PM	March 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Lenard Lutz, Maintenance	N/A	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Robin Reck, Operator of Record 1304 North Road Troy, OH 45373 ROBR@woh.rr.com	937.335.2614	
Name, Address and Title of Responsible Official	Phone Number	
Alexander Reck 5385 Croft Mill Road Bradford, OH 45308	937.473.5995	

Ohio EPA Inspector	Ohio EPA Reviewer
 Sandra D. Leibfritz Division of Surface Water Southwest District Office Date: 7/12/13	 Joe Miller Environmental Supervisor Division of Surface Water Southwest District Office Date: 7/10/13

Average Daily Design Flow:	15,000 Gallons/Day
Plant Serves:	66 lots
Average Daily Flow: (Period of Review):	8,400 Gallons/Day (May through December 2012)
Method of flow monitoring:	
Type of alarms for plant:	Audio

Comments/Status:

The WWTP consists of a grinder pumps, an equalization basin, extended aeration, clarification, slow surface sand filters and UV disinfection. The park is licensed for 66 lots; however, only 30 to 40 are occupied. All blowers and pumps were reported as operational. The alarm is not working properly (audio or visual). The operator reported that the audio was working; however, the blowers drown out the sound of the alarm. The light does not work; however, the fence that surrounds the WWTP would block the view of the alarm.

Equalization Basin

Two Pumps present: **Yes**
 Both Pumps operational: **Yes**
 Alarm present: **No**
 Alarm operational: **N/A**
 Maintenance of equalization basin is: **Satisfactory**

Comments/Status:

Aeration was occurring in the equalization (EQ) basin. The operator reported that both grinder pumps were operational. Blowers operate 24 hours 7 days a week.

**Secondary Treatment
(Aeration)**

Color of sludge: **Dark Brown**
 Quality of Sludge: **Heavy**
 Foam: **Heavy (dark)**
 Odor: **No objectionable odor present**

	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...**Marginal**

Comments/Status:

The operator reported that solids were last wasted in April 2013 and then on June 25, 2013.

**Secondary Treatment
(Settling)**

Clarity: **Bulking Solids**
 Condition of Weir: **Excessive Algae/Solids Build Up**
 Weir is level: **Yes**
 Effluent in weir: **Light Solids**
 Clarifier walls need scraped: **Unknown**

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

Comments/Status:

There was a significant amount of bulking solids on the surface of the clarifier.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	uv present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Marginal**

Comments/Status:

The sand in the beds was slightly uneven and should be raked to be level. Bed No. 1 was overgrown with weeds. There is a solids layer on bed no. 1.

Sludge Handling/Storage Disposal

Hauler name: **Mike's Sanitation**
 Disposal Site: **Mike's Sanitation**
 Sludge wasted from: **Clarifier**
 How often is sludge wasted **N/E**
 Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Marginal**

Comments/Status:

Plant Discharge

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

Comments/Status:

Record Keeping/Operator of Record

- (a) Wastewater treatment Works Classification (OAC 3745-7)..... A
- (b) Operator of Record holds unexpired license of class required by NPDES 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?..... Y
- (e) Minimum operator staffing hours fulfilled? Y
- (f) Operat or of Record logbook provided?..... Y
- (g) Format of logbook (e.g. computer log, hard bound book etc.)

Hardbound preprinted forms on a monthly basis

- (h) Logbook kept onsite in an area protected from weather..... Y
- (i) Logbook contains each of the following:
 - a. Identification of treatment works..... Y
 - b. Dates and times of arrival and departure of OR and any other operator..... Y
 - c. Daily record of operator and maintenance activities including preventative maintenance, repairs, process control tests etc..... Y
 - d. Laboratory analysis results unless documented on bench sheets.....N
 - e. Identification of person making entries.....Y
- (j) Has the operator of record submitted written notifications to the permittee and Ohio EPA when a collection system overflow, treatment plant bypass or effluent limit violation has occurred?.....N/A

Comments/Status:

Robin Reck is the ORC and has a Class I license. Ms. Leibfritz could not find a copy of her certification on display. The operator reported that it was there and under something else and dirty.

EFFLUENT LIMIT VIOLATIONS
(Period of Review: May 2012 through May 2013)

7D = Weekly 30D = Monthly 1D = Daily Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
None Reported					

