



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: *September 30, 2024*

SUBJECT: CLEAN WATER ACT INSPECTION REPORT
*Hayden Heights MHP, UMH Central OH, LLC, 5501 Cosgray, Dublin, Ohio,
Franklin County*

FROM: Jonathan Moody, Environmental Engineer
WECAB, Multimedia Section

THRU: Brooke Furio, Section Supervisor
WECAB, Multimedia Section

BASIC INFORMATION

Facility Name: *Hayden Heights MHP, UMH Central OH, LLC*

Facility Type: *Extended aeration treatment plant (privately-owned mobile home park)*

NPDES Permit Number: *OH0136051*

Date of Inspection: September 5, 2024

Date of Previous Inspection: June 5, 2024, closing conference on June 21, 2024

EPA Inspector(s):

1. Jonathan Moody, Lead Inspector

Facility Representative(s):

1. Bo Foster, UMH Properties, Inc., Property Manager

Contact Email Address: jyorick@umh.com, jsearcy@umh.com

Owner Contact	Operator Contact Contract Operator	Physical Facility Address
Jeffrey V. Yorick, P.E. Executive Vice President for Engineering UMH Properties, Inc. 150 Clay Street, Suite 410 Morgantown, WV 26501 304-291-3380	Eric Britenstine Brittenstine Environmental 614-207-9030	Hayden Heights MHP 5501 Cosgray Road Dublin, Ohio

Inspection Type: *Compliance Evaluation with Sampling*

Facility Notification:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

Arrival Date and Time: 9/5/2024 1:30 PM

Departure Date and Time: 9/5/24 2:00 PM

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet, previously provided
- ☐ Small Business Resource Information Sheet not provided. Reason: N/A
- ☒ Provided CBI notification to facility

The following information was obtained verbally from Bo Foster unless otherwise noted.

Background:

The Hayden Heights property is a Manufactured Home Community (MHC) owned by UMH Properties, Inc. The property has approximately 115 lots total for manufactured homes. At the time of the inspection all lots were occupied. A list of effluent exceedances is included in Appendix D.

Process Description:

The treatment facility is an extended aeration basins with an equalization tank, slow sand filters, and a UV disinfection system. This report does not contain Confidential Business Information (CBI).

Staff Interview(s):

Bo Foster said the operator had planned to fix the UV system after the end of the summer monitoring season.

FACILITY WALK-THROUGH OCCURRED:

Yes

Data Collected and Observations:

EPA collected a bacteriological sample for E. coli from the UV system channel. This is the location which was identified during a previous inspection, on June 5, 2024, as the compliance sampling location for Outfall 001. The inspection on September 5, 2024 was a follow-up to the earlier inspection on June 5, 2024.

The sample was collected into a 120mL sterile plastic bottles pre-preserved with sodium thiosulfate provided by Pace Analytical Services.

After collecting the sample, Jonathan Moody conducted additional monitoring using an AT-600 wastewater meter.

Three of the six lamps were offline at the time of the inspection. Looking at the control panel shown in Photo 1, the bottom lamp on the left bank and both lamps in the center bank were offline. These are the same locations as the lamps which were offline during the June 5, 2024 inspection.

Photos and/or Videos: were taken during the inspection.

A photolog for the photos taken during the inspection is included in Appendix B.

Field Measurements: were taken during this inspection.

The results of monitoring conducted while in the field are included in Appendix C.

The results of samples collected during the inspection are included in Appendix D.

RECORDS REVIEW

List of Records Reviewed Onsite:

No records were reviewed onsite

Requested documents: N/A

Documents Received From Facility: N/A

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility.
- ☒ Explained Inspection Report Process
- ☐ Confirm CBI status at end of closing conference. No CBI claimed.
- ☒ Discussed Preliminary Area(s) of Concern

Areas of Concern:

1. NPDES Permit No. OH0136051 Part III-General Conditions 3.A. - Facility Operation and Quality Control

"All wastewater treatment works shall be operated in a manner consistent with the following: A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."

Three of the six lamps were offline at the time of the inspection. Looking at the control panel shown in Photo 1, the bottom lamp on the left bank and both lamps in the center bank were offline. These are the same locations as the lamps which were offline during the June 5, 2024 inspection.

1. NPDES Permit No. OH0136051 Part I, A. – Final Effluent Limitations and Monitoring Requirements

Final Outfall – 001 – Final

Parameter: E. coli - #/100 ml

Measuring Frequency: 1/Month during Summer

Weekly Limit: 284

Monthly Limit: 126

Result of the E. coli sample taken during the inspection was 411 which is higher than the weekly and monthly averages. At the time of writing of this report, the other weekly and monthly values were not known.

Appendices

- A. Aerial Image
- B. Digital Image Log
- C. Field Measurement Data
- D. EPA Sampling Results from Pace Analytical Services

Attachments

- 1. Transmittal of Sample Analysis Results (Laboratory Reports)

DIGITAL SIGNATURES

Report Author: Jonathan Moody

Report Author Signature: **JONATHAN MOODY** Digitally signed by JONATHAN MOODY
Date: 2024.09.30 12:59:43 -04'00'

Section Supervisor: Brooke Furio

Section Supervisor Signature: **BROOKE FURIO** Digitally signed by BROOKE FURIO
Date: 2024.09.30 14:16:32 -04'00'

Date of Inspection: September 5, 2024

An aerial photograph of the Amlin Self-Storage facility, showing several large, rectangular storage units. To the left of the units is a large, dark, irregularly shaped pond labeled 'Stormwater Pond'. Above the pond is a large, rectangular area labeled 'Unused EQ Basin'. To the right of the pond is a large, rectangular area labeled 'Drying Beds'. Further to the right is a long, narrow, rectangular area labeled 'Filters'. Above the filters is a small, rectangular area labeled 'UV Chamber'. The facility is located near a residential area, with houses visible in the background. The address '7265' is visible on one of the houses. The facility is labeled 'Amlin Self-Storage' with a location pin icon.

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024

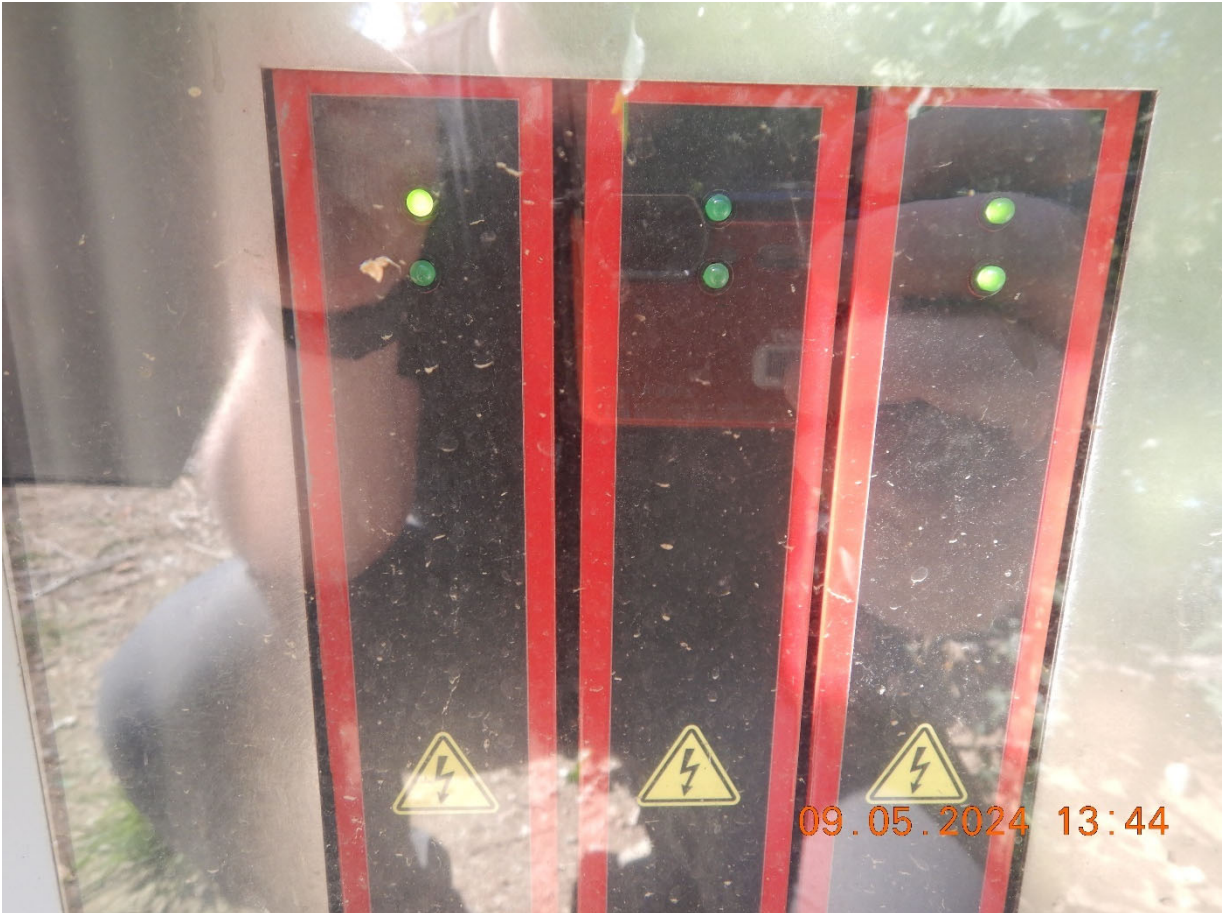
APPENDIX B: PHOTOLOG

CAMERA: COOLPIX W300

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024



1: DSCN2288.JPG

Location: Hayden Heights

Photographer: Jonathan Moody

Date/Time: 9/5/2024 1:44 PM

Camera Direction: North

Description: At the time of the inspection, three of the six lamps were burned out, or offline. These are the same lamps which were offline during the inspection on June 5, 2024.

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024



2: DSCN2289.JPG

Location: Hayden Heights

Photographer: Jonathan Moody

Date/Time: 9/5/2024 1:47 PM

Camera Direction: Northeast

Description: Sample S04, E. coli sample collected from the UV disinfection channel at the location which was identified by the operator during the June 5, 2024 as the location where compliance samples are collected for Outfall 001.

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024



3: DSCN2290.JPG

Location: Hayden Heights

Photographer: Jonathan Moody

Date/Time: 9/5/2024 1:52 PM

Camera Direction: North

Description: Visual grab sample collected form the UV channel at Outfall 001.

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024



4: [DSCN2291.JPG](#)

Location: Hayden Heights

Photographer: Jonathan Moody

Date/Time: 9/5/2024 1:52 PM

Camera Direction: Down

Description: Visual grab sample collected form the UV channel at Outfall 001.

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024

APPENDIX C: FIELD MEASUREMENT DATA AND SAMPLING

Jonathan Moody conducted field monitoring using an In-Situ AquaTroll 600 (AT600), Serial Number 1079129. The AT600 was equipped with a temperature/conductivity sensor, pH sensor, Rugged Dissolved Oxygen (RDO) sensor and a turbidity sensor. The chart below shows the results of the monitoring. The AT600 was calibrated September 4, 2024 using a 3-point pH calibration and the In-Situ “Quick Cal” solution for specific conductivity. The RDO sensor was calibrated using the 100% saturation method on September 5, 2024, just before starting the field monitoring.

<i>Date/Time</i>	<i>Ref. #</i>	<i>Location</i>	<i>Cond (ug/cm)</i>	<i>pH (SU)</i>	<i>RDO (mg/l)</i>	<i>Turbidity (NTU) equivalent</i>
9/5/2024 1:53 PM	MP-07	UV channel, compliance monitoring point for Outfall 001. Using a grab jar.	1922	8.23	8.99	0

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024

APPENDIX D: EPA SAMPLING RESULTS FROM PACE ANALYTICAL SERVICES

One grab sample was collected during this inspection. A complete copy of the laboratory report is included in Attachment 1. A summary of the results is shown in the table below:

<i>Date/Time</i>	<i>Ref. #</i>	<i>Location</i>	<i>E. Coli MPN 100 ml</i>
9/5/2024 1:45 PM	4092775- 02	<i>Effluent Outfall 001</i>	411

Method: Colilert[®] - Most Probable Number (MPN)

Facility Name: *Hayden Heights MHP*

Facility Location: *5501 Cosgray, Dublin, Ohio, Franklin County*

Date of Inspection: September 5, 2024

ATTACHMENT 1 : LABORATORY REPORTS

Certificate of Analysis 4092775

Jonathan Moody
(ERG) Eastern Research Group, Inc
14555 Avion Parkway Suite 200
Chantilly, VA 20151

Customer ID: 44-103012
Report Printed: 09/10/2024 18:35

Project Name: UMH E.Coli Sampling

Workorder: 4092775

Dear Jonathan Moody

Enclosed are the analytical results for samples received by the laboratory 09/05/2024 15:16.

The results relate to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services LLC Kentucky - Englewood

If you have any questions concerning this report, please feel free to contact me.



#460210 Madisonville, KY
#460291 Pikeville, KY
#E871136 Englewood, OH

This page is included as part of the Analytical Report and must be retained as a permanent record thereof.



Alicia Barnes, Project Manager



SAMPLE SUMMARY

Lab ID	Client Sample ID/Alias	Matrix	Date Collected	Date Received	Sampled By
4092775-01	E.Coli/S03 Wood Valley	Water	09/05/2024 12:12	09/05/2024 15:16	Client
4092775-02	E.Coli/S04 Haden Heights	Water	09/05/2024 13:45	09/05/2024 15:16	Client

ANALYTICAL RESULTS

Lab Sample ID: **4092775-01**

Sample Collection Date Time: 09/05/2024 12:12

Description: **E.Coli S03 Wood Valley**

Sample Received Date Time: 09/05/2024 15:16

Conventional Chemistry Analyses Englewood

Analyte	Result	Flag	Units	MRL	MDL	Method	Prepared	Analyzed	Analyst
E. Coli	866		MPN/100m L	1	1	Colilert® - MPN	09/05/2024 15:50	09/06/2024 17:28	EKWW

ANALYTICAL RESULTS

Lab Sample ID: **4092775-02**

Sample Collection Date Time: 09/05/2024 13:45

Description: **E.Coli S04 Haden Heights**

Sample Received Date Time: 09/05/2024 15:16

Conventional Chemistry Analyses Englewood

Analyte	Result	Flag	Units	MRL	MDL	Method	Prepared	Analyzed	Analyst
E. Coli	411		MPN/100m L	1	1	Colilert® - MPN	09/05/2024 15:50	09/06/2024 17:28	EKWW



Notes for work order 4092775

- Samples collected by PACE personnel are done so in accordance with procedures set forth in PACE field services SOPs .
 - Results contained in this report are only representative of the samples received.
 - PACE does not provide interpretation of these results unless otherwise stated .
 - All Waste Water analyses comply with methodology requirements of 40 CFR Part 136.
 - All Drinking Water analyses comply with methodology requirements of 40 CFR Part 141.
 - Unless otherwise noted, all quantitative results for soils are reported on a dry weight basis.
 - The Chain of Custody document is included as part of this report.
 - All Library Search analytes should be regarded as tentative identification based on the presumptive evidence of the mass spectra.
- Concentrations reported are estimated values.

Qualifiers

U Target analyte was analyzed for , but was below detection limit (the value associated with the qualifier is the laboratory method detection limit in our LIMS system).

Standard Qualifiers/Acronyms

MDL	Method Detection Limit
MRL	Minimum Reporting Limit
ND	Not Detected
LCS	Laboratory Control Sample
MS	Matrix Spike
MSD	Matrix Spike Duplicate
DUP	Sample Duplicate
% Rec	Percent Recovery
RPD	Relative Percent Difference
>	Greater than
<	Less than



Pace Analytical Services, LLC

P.O. Box 907

Madisonville, KY 42431

270.821.7375

www.pacelabs.com

Conventional Chemistry Analyses Englewood - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch BDI0449 - Default Prep Micro 7

Blank (BDI0449-BLK1)

Prepared: 9/5/2024 15:50, Analyzed: 9/6/2024 17:28

E. Coli	ND		1 MPN/100mL							U
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Conventional Chemistry Analyses Englewood - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch BDI0449 - Default Prep Micro 7

LCS (BDI0449-BS1)

Prepared: 9/5/2024 15:50, Analyzed: 9/6/2024 17:28

E. Coli	2420	1	MPN/100mL	2420	100	0-200
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Certified Analyses included in this Report

Analyte	Certifications
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Colilert® - MPN in Water

E. Coli	KY Drinking Water Mdv (00030) KY Wastewater Mdv (00030)
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Sample Acceptance Checklist for Work Order 4092775

Shipped By: Client

Temperature: 5.90° Celcius

Condition

Check if Custody Seals are Present/Intact	☐
Check if Custody Signatures are Present	☒
Check if Collector Signature Present	☒
Check if bottles are intact	☒
Check if bottles are correct	☒
Check if bottles have sufficient volume	☒
Check if samples received on ice	☒
Check if VOA headspace is acceptable	☐
Check if samples received in holding time.	☒
Check if samples are preserved properly	☒

4092775

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TAG NUMBERS

Printed on Recycled Paper/Printed with Soy-Based Ink

5-63813