



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Seneca County  
Pelton / Poplar Village MHP  
Sewerage

October 8, 2008

Donald Garner  
Poplar Village MHP  
2930 Geer Rd., Suite 105  
Turlock, CA 95382-1142

Dear Mr. Garner:

On September 24, 2008, an inspection was made of the wastewater treatment facilities which serve Pelton Mobile Home Park (MHP). It has been indicated that you recently purchased the MHP, and have changed the name to Poplar Village MHP. Observations and recommendations of the existing plant are as follows:

The WWTP was in operation at the time of the inspection and the following observations were made:

- The cover over the trash trap appears to be falling into the tank. This cover needs to be repaired and/or removed to prevent damage to the tank or obstruction of the flows.
- The aeration tank was operating but the contents of the tank had a weak color. This could be due to inadequate solids being returned from the clarifier tank.
- A slight septic odor was present at the aeration/clarifier tanks.
- The sludge return line was in operation with a very high return rate. The discharge appeared to contain some light solids.
- The skimmer return line was operating, but the skimmer device was observed to be submerged below the surface level of the clarifier tank. The skimmer return was also operating with a very high return rate.
- The north side of the aeration tank was observed to have a significant fracture (crack) in the concrete wall. The crack is located about mid tank, and extends below the surface of the ground. An assessment of the extent of the crack and the tanks integrity (in regards to leakage) will be needed. Documentation of this evaluation shall be submitted to this office no later than November 15, 2008.

Mr. Donald Garner  
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- The contents of the clarifier was slightly turbid and bulking sludge was present on the surface of this tank.
- The transfer lines from the aeration tank into the clarifier were observed to be flowing at a high rate. This was observed to be causing mixing and turbulence within the clarifier tank.
- The clarifier hopper walls should be scraped down once per day to increase the solids returned. This will also prevent sludge from bulking and floating to the surface of the tank.
- It was previously indicated that the sump pump, located in the southeast corner of the clarifier should be removed and the outlet pipe concreted shut.
- The effluent discharge channel was observed to be tilted up and out of the water surface, with only the outlet end fastened at the surface level. This needs to be repaired with an appropriate discharge outlet weir.
- The outlet pipes located in the sand filter lift station, which are not part of the pumping process need to be removed and concreted shut.
- There was no observable disinfection (chlorine or de-chlorination) being provided. Disinfection must be provided from May through October.
- It appeared that the east sand filter bed was in use at the time of the inspection. Both filters were observed to contain weeds and had an accumulation of solids. The west sand filter need to be cleaned as soon as possible to make it available for use.

**NPDES Permit Change of Ownership:**

An application for transfer of Ohio NPDES Permit is required for the change of ownership of this facility. A copy of "*Instructions for Applying to Transfer an Ohio EPA Individual NPDES Permit*" is enclosed. The NPDES permit transfer application form will be provided upon request or can be downloaded from our website:  
[http://www.epa.state.oh.us/dsw/permits/NPDESTransferForm\\_fis.pdf](http://www.epa.state.oh.us/dsw/permits/NPDESTransferForm_fis.pdf)

**The completed NPDES permit transfer application should be mailed to the Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

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**NPDES Permit Compliance Schedule:**

The NPDES permit for this facility includes the following compliance schedule items which were to have been submitted but not yet received along with one due shortly:

6/1/2007 - Submit Permit to Install (PTI) for disinfection facilities. (Event Code 01799) Attain operational level of the treatment works to meet the final effluent chlorine limitation not later than May 1, 2007.

5/1/2008 – Submit a sewer system evaluation survey and sanitary sewer infiltration/inflow (I/I) analysis. Items to be included in the I/I analysis are specified in permit. (Event Code 11599)

11/1/2008 – Submit detail plans and a PTI for sewer system improvements necessary to implement the recommendations of the study to reduce the volume of Infiltration/Inflow entering the collection system. (Event Code 1299)

Records indicate that the WWTP serving this MHP was constructed in 1968 (~40 year old WWTP). At this time, the list of permit violations (attached) and NPDES permit compliance schedule violations (above) indicate ongoing noncompliance issues. The best available treatment alternative for a facility is connection to the public sanitary sewer. This area is included in the City of Fostoria's (208) Facility Planning Area, which indicates that the sewerage needs for this area are to be provided by a connection to the City of Fostoria's sanitary sewer system. Due to the close proximity, we recommend that a sanitary sewer connection to the City of Fostoria sanitary sewer be pursued. Mr. Dan Thornton, City of Fostoria (419-435-9775), should be contacted regarding this connection.

An extension of the sanitary sewer will require the submission of a Permit to Install (PTI) application and detail plans for this project. Please be advised that the installation of sewerage or treatment works for sewage disposal or new disposal systems, including, but not limited to, sanitary sewers, at any location in Ohio without first receiving prior approval from the Director of Ohio EPA is a violation of Ohio Revised Code (ORC) Sections 6111.07 and 6111.44 and Ohio Administrative Code (OAC) 3745-42-02(A).

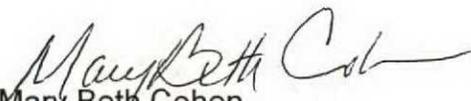
Mr. Donald Garner  
October 7, 2008  
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Please be advised that any on site package treatment plant is approved as a temporary system, which will be required to be abandoned when public sewers become available.

A review of your discharge monitoring reports has been conducted. A list of permit limit and frequency violations (Dec 2006 – August 2008) is enclosed. A copy of the pictures taken during the inspection, are also enclosed.

Failure to properly operate and maintain the WWTP can be cause for escalated enforcement action that may include penalties. If there are any questions, please advise.

Yours truly,

  
Mary Beth Cohen  
Division of Surface Water

/lb

Enclosure

pc: Seneca County Health Department  
Mrs. Pelton, Pelton MHP w/ enclosures  
Manager, Poplar Village MHP  
NWDO-DSW File

Pelton MHP 2PY00032

Limit Violations December 2006 through August 2008

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00032*AD	December 2006	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	9.85	12/01/06
2PY00032*AD	December 2006	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.67108	12/01/06
2PY00032*AD	December 2006	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	9.85	12/08/06
2PY00032*AD	December 2006	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.3	.67108	12/08/06
2PY00032*AD	January 2007	001	00530	Total Suspended Solids	30D Conc	12	22.	01/01/07
2PY00032*AD	January 2007	001	00530	Total Suspended Solids	30D Qty	0.9	1.49886	01/01/07
2PY00032*AD	January 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	10.08	01/01/07
2PY00032*AD	January 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.68675	01/01/07
2PY00032*AD	February 2007	001	00530	Total Suspended Solids	30D Conc	12	13.	02/01/07
2PY00032*AD	February 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	8.71	02/01/07
2PY00032*AD	February 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.59341	02/01/07
2PY00032*AD	February 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	8.71	02/22/07
2PY00032*AD	February 2007	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.3	.59341	02/22/07
2PY00032*AD	February 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	02/27/07
2PY00032*AD	March 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.21	03/01/07
2PY00032*AD	March 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.2187	03/01/07
2PY00032*AD	March 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	03/15/07
2PY00032*AD	April 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	04/19/07
2PY00032*BD	May 2007	001	00530	Total Suspended Solids	30D Conc	12	40.	05/01/07
2PY00032*BD	May 2007	001	00530	Total Suspended Solids	30D Qty	0.9	2.7252	05/01/07
2PY00032*BD	May 2007	001	31616	Fecal Coliform	30D Conc	1000	26400.	05/01/07
2PY00032*BD	May 2007	001	50060	Chlorine, Total Residu	1D Conc	0.019	2.	05/05/07
2PY00032*BD	May 2007	001	50060	Chlorine, Total Residu	1D Conc	0.019	2.	05/12/07
2PY00032*BD	May 2007	001	00530	Total Suspended Solids	1D Conc	18	40.	05/17/07
2PY00032*BD	May 2007	001	00530	Total Suspended Solids	1D Qty	1.3	2.7252	05/17/07
2PY00032*BD	May 2007	001	31616	Fecal Coliform	1D Conc	2000	26400.	05/17/07
2PY00032*BD	May 2007	001	50060	Chlorine, Total Residu	1D Conc	0.019	1.	05/17/07
2PY00032*BD	May 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	05/17/07
2PY00032*BD	May 2007	001	50060	Chlorine, Total Residu	1D Conc	0.019	2.	05/28/07
2PY00032*BD	June 2007	001	00530	Total Suspended Solids	30D Conc	12	14.	06/01/07
2PY00032*BD	June 2007	001	00530	Total Suspended Solids	30D Qty	0.9	.95382	06/01/07
2PY00032*BD	June 2007	001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	06/02/07
2PY00032*BD	June 2007	001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	06/23/07

Pelton MHP 2PY00032

Limit Violations December 2006 through August 2008

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00032*BD	July 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.89	07/01/07
2PY00032*BD	July 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.07	.11131	07/01/07
2PY00032*BD	July 2007	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	3.89	07/18/07
2PY00032*BD	July 2007	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.11	.11131	07/18/07
2PY00032*BD	October 2007	001	00530	Total Suspended Solids	30D Conc	12	13.	10/01/07
2PY00032*BD	October 2007	001	00530	Total Suspended Solids	30D Qty	0.9	.93883	10/01/07
2PY00032*BD	October 2007	001	31616	Fecal Coliform	30D Conc	1000	14300.	10/01/07
2PY00032*BD	October 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	5.2	10/06/07
2PY00032*BD	October 2007	001	31616	Fecal Coliform	1D Conc	2000	14300.	10/18/07
2PY00032*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	9.13	01/01/08
2PY00032*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.20	.58056	01/01/08
2PY00032*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	9.13	01/31/08
2PY00032*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.30	.58056	01/31/08
2PY00032*BD	February 2008	001	00530	Total Suspended Solids	30D Conc	12	30.	02/01/08
2PY00032*BD	February 2008	001	00530	Total Suspended Solids	30D Qty	0.9	1.3626	02/01/08
2PY00032*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	14.87	02/01/08
2PY00032*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.20	.6754	02/01/08
2PY00032*BD	February 2008	001	00530	Total Suspended Solids	1D Conc	18	30.	02/18/08
2PY00032*BD	February 2008	001	00530	Total Suspended Solids	1D Qty	1.3	1.3626	02/18/08
2PY00032*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	14.87	02/18/08
2PY00032*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.30	.6754	02/18/08
2PY00032*BD	March 2008	001	00530	Total Suspended Solids	30D Conc	12	22.	03/01/08
2PY00032*BD	March 2008	001	00530	Total Suspended Solids	30D Qty	0.9	.99924	03/01/08
2PY00032*BD	March 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	9.24	03/01/08
2PY00032*BD	March 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.20	.41968	03/01/08
2PY00032*BD	March 2008	001	00530	Total Suspended Solids	1D Conc	18	22.	03/05/08
2PY00032*BD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	9.24	03/05/08
2PY00032*BD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.30	.41968	03/05/08
2PY00032*BD	March 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	03/23/08
2PY00032*BD	March 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.9	03/29/08
2PY00032*BD	April 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.79	04/01/08
2PY00032*BD	April 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.20	.21756	04/01/08
2PY00032*BD	April 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	04/06/08
2PY00032*BD	April 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	4.79	04/16/08
2PY00032*BD	April 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	4.1	04/16/08

Pelton MHP 2PY00032

Limit Violations December 2006 through August 2008

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00032*BD	June 2008	001	00530	Total Suspended Solids	30D Conc	12	30.	06/01/08
2PY00032*BD	June 2008	001	00530	Total Suspended Solids	30D Qty	0.9	1.3626	06/01/08
2PY00032*BD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	06/06/08
2PY00032*BD	June 2008	001	00530	Total Suspended Solids	1D Conc	18	30.	06/11/08
2PY00032*BD	June 2008	001	00530	Total Suspended Solids	1D Qty	1.3	1.3626	06/11/08
2PY00032*BD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	06/11/08
2PY00032*BD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	3.4	06/19/08
2PY00032*BD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	06/24/08
2PY00032*BD	July 2008	001	31616	Fecal Coliform	30D Conc	1000	19000.	07/01/08
2PY00032*BD	July 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	07/07/08
2PY00032*BD	July 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	3.	07/14/08
2PY00032*BD	July 2008	001	31616	Fecal Coliform	1D Conc	2000	19000.	07/21/08
2PY00032*BD	July 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	07/21/08
2PY00032*BD	July 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	07/27/08
2PY00032*BD	August 2008	001	31616	Fecal Coliform	30D Conc	1000	14900.	08/01/08
2PY00032*BD	August 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	08/07/08
2PY00032*BD	August 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	2.5	08/13/08
2PY00032*BD	August 2008	001	31616	Fecal Coliform	1D Conc	2000	14900.	08/19/08
2PY00032*BD	August 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	3.2	08/19/08
2PY00032*BD	August 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	08/27/08

Pelton MHP 2PY00032

Frequency Violations December 2006 through August 2008

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Number of Days Not Reported	Violation Date
2PY00032*BD	July 2007	001	00083	Color, Severity	1/Day	13	various
2PY00032*BD	August 2007	001	00083	Color, Severity	1/Day	19	various
2PY00032*BD	October 2007	001	00083	Color, Severity	1/Day	25	various
2PY00032*BD	November 2007	001	00083	Color, Severity	1/Day	20	various
2PY00032*BD	December 2007	001	00083	Color, Severity	1/Day	27	various
2PY00032*BD	January 2008	001	00083	Color, Severity	1/Day	26	various
2PY00032*BD	February 2008	001	00083	Color, Severity	1/Day	25	various
2PY00032*BD	March 2008	001	00083	Color, Severity	1/Day	6	various
2PY00032*BD	May 2008	001	00083	Color, Severity	1/Day	7	various
2PY00032*BD	June 2008	001	00083	Color, Severity	1/Day	26	various
2PY00032*BD	July 2008	001	00083	Color, Severity	1/Day	27	various
2PY00032*BD	August 2008	001	00083	Color, Severity	1/Day	27	various
2PY00032*AD	December 2006	001	00300	Dissolved Oxygen	1/Week	3	Week 1, 3, 4
2PY00032*AD	January 2007	001	00300	Dissolved Oxygen	1/Week	4	Week 1 - 4
2PY00032*AD	February 2007	001	00300	Dissolved Oxygen	1/Week	3	Week 1, 2, 4
2PY00032*AD	March 2007	001	00300	Dissolved Oxygen	1/Week	3	Week 1, 2, 4
2PY00032*AD	April 2007	001	00300	Dissolved Oxygen	1/Week	3	Week 1, 2, 4
2PY00032*BD	May 2007	001	00300	Dissolved Oxygen	1/Week	3	Week 1, 2, 4
2PY00032*BD	June 2007	001	00300	Dissolved Oxygen	1/Week	3	Week 1, 3, 4
2PY00032*BD	August 2007	001	00300	Dissolved Oxygen	1/Week	1	Week 3
2PY00032*BD	November 2007	001	00300	Dissolved Oxygen	1/Week	1	Week 3
2PY00032*BD	March 2008	001	00300	Dissolved Oxygen	1/Week	1	Week 3
2PY00032*BD	May 2007	001	00056	Flow Rate	1/Day	31	various
2PY00032*BD	June 2007	001	00056	Flow Rate	1/Day	30	various
2PY00032*BD	July 2007	001	01330	Odor, Severity	1/Day	13	various
2PY00032*BD	August 2007	001	01330	Odor, Severity	1/Day	19	various
2PY00032*BD	October 2007	001	01330	Odor, Severity	1/Day	25	various
2PY00032*AD	November 2007	001	01330	Odor, Severity	1/Day	20	various
2PY00032*BD	December 2007	001	01330	Odor, Severity	1/Day	27	various
2PY00032*BD	January 2008	001	01330	Odor, Severity	1/Day	26	various
2PY00032*BD	February 2008	001	01330	Odor, Severity	1/Day	25	various
2PY00032*BD	March 2008	001	01330	Odor, Severity	1/Day	6	various
2PY00032*BD	May 2008	001	01330	Odor, Severity	1/Day	7	various
2PY00032*BD	June 2008	001	01330	Odor, Severity	1/Day	26	various
2PY00032*BD	July 2008	001	01330	Odor, Severity	1/Day	27	various

Pelton MHP 2PY00032

Frequency Violations December 2006 through August 2008

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Number of Days Not Reported	Violation Date
2PY00032*BD	August 2008	001	01330	Odor, Severity	1/Day	27	various
2PY00032*BD	July 2007	001	01350	Turbidity, Severity	1/Day	13	various
2PY00032*BD	August 2007	001	01350	Turbidity, Severity	1/Day	19	various
2PY00032*BD	October 2007	001	01350	Turbidity, Severity	1/Day	25	various
2PY00032*BD	November 2007	001	01350	Turbidity, Severity	1/Day	20	various
2PY00032*BD	December 2007	001	01350	Turbidity, Severity	1/Day	27	various
2PY00032*BD	January 2008	001	01350	Turbidity, Severity	1/Day	26	various
2PY00032*AD	February 2008	001	01350	Turbidity, Severity	1/Day	25	various
2PY00032*BD	March 2008	001	01350	Turbidity, Severity	1/Day	6	various
2PY00032*BD	May 2008	001	01350	Turbidity, Severity	1/Day	7	various
2PY00032*BD	June 2008	001	01350	Turbidity, Severity	1/Day	26	various
2PY00032*BD	July 2008	001	01350	Turbidity, Severity	1/Day	27	various
2PY00032*BD	August 2008	001	01350	Turbidity, Severity	1/Day	27	various
2PY00032*AD	December 2006	001	00010	Water Temperature	1/Week	4	Week 1 - 4
2PY00032*AD	January 2007	001	00010	Water Temperature	1/Week	4	Week 1 - 4
2PY00032*AD	February 2007	001	00010	Water Temperature	1/Week	4	Week 1 - 4
2PY00032*AD	March 2007	001	00010	Water Temperature	1/Week	4	Week 1 - 4
2PY00032*AD	April 2007	001	00010	Water Temperature	1/Week	2	Week 1, 2
2PY00032*BD	June 2007	001	00010	Water Temperature	1/Week	2	Week 2, 3
2PY00032*BD	August 2007	001	00010	Water Temperature	1/Week	1	Week 3
2PY00032*BD	November 2007	001	00010	Water Temperature	1/Week	1	Week 3
2PY00032*BD	March 2008	001	00010	Water Temperature	1/Week	1	Week 3



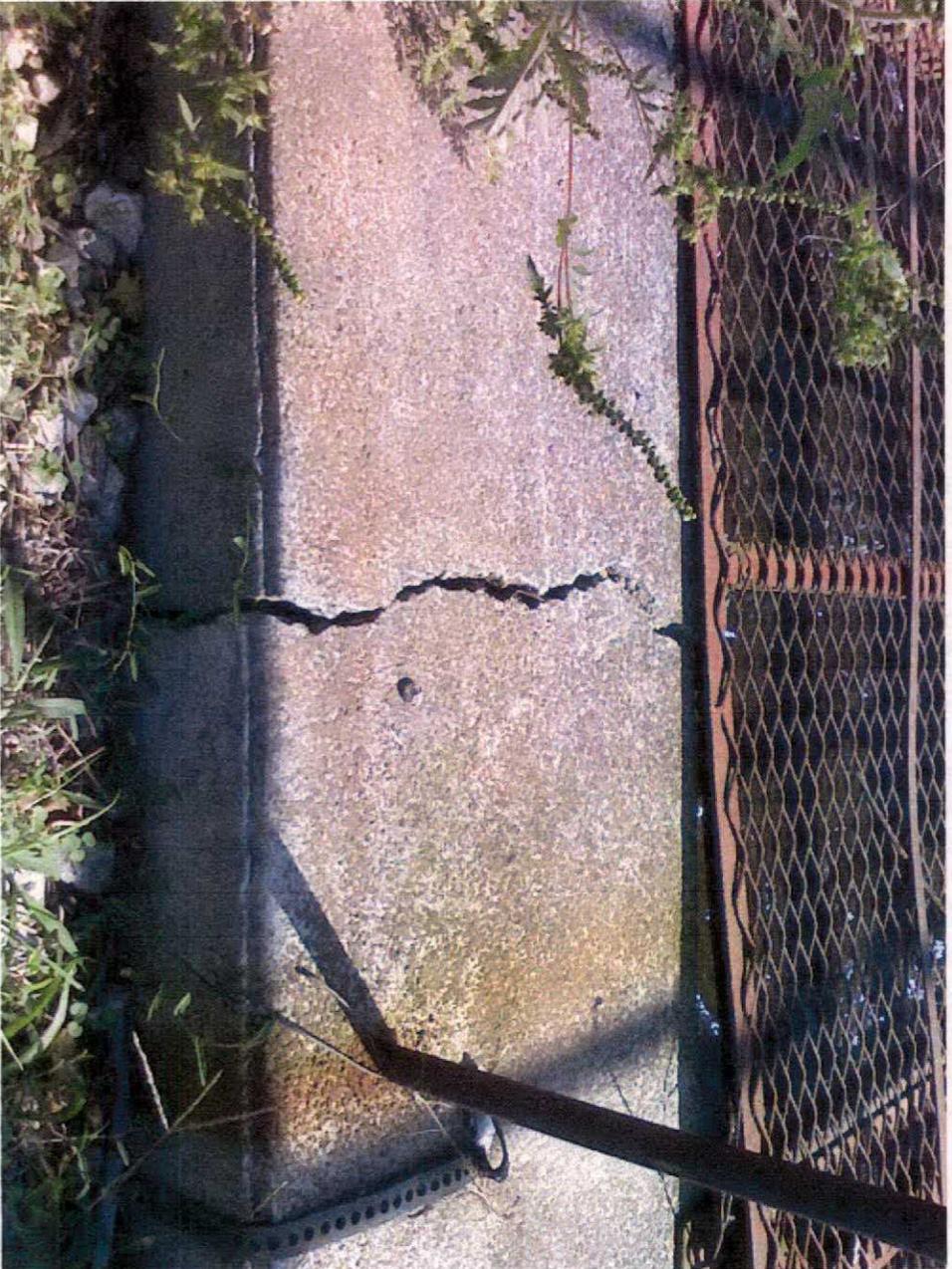
Poplar Village (Pelton) MHP, Seneca Co.  
Looking north at WWTP  
taken by M.B.Cohen, 9/24/08



Poplar Village (Pelton) MHP, Seneca Co.  
Looking northwest at trash trap  
taken by M.B.Cohen, 9/24/08



Poplar Village (Pelton) MHP, Seneca Co.  
Outlet weir in clarifier  
taken by M.B.Cohen, 9/24/08



Poplar Village (Pelton) MHP, Seneca Co.  
WWTP - crack in concrete wall on north side of aeration tank  
taken by M.B. Cohen, 9/24/08



Poplar Village (Pelton) MHP, Seneca Co.  
Looking northwest at east side of sand filter  
taken by M.B.Cohen, 9/24/08



Poplar Village (Pelton) MHP, Seneca Co.  
Looking north at sand filter (west half)  
taken by M.B.Cohen, 9/24/08



Poplar Village (Pelton) MHP, Seneca Co.  
Looking north at sand filter (east half)  
taken by M.B.Cohen, 9/24/08