



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Richland County
Clear Fork MHP
NPDES Permit

April 5, 2010

Ms. Becky Rodgers
Finsilver Freidman
4333 Chesford Drive
Columbus, OH 43224

Dear Ms. Rodgers,

Our office has been informed that Finsilver Freidman is the receiver for the property of the Clear Fork Mobile Park located at 1260 S.R. 97, Bellville, Richland County which has been foreclosed upon. This facility has a wastewater treatment system that is currently permitted by our Agency to discharge to waters of the State of Ohio under the National Pollutant Discharge Elimination System (NPDES) permit #2PY00024. This permit is currently issued to the Ashford Management Group who was the former owner of the property.

On February 24, 2010, an inspection was made of the wastewater treatment facilities serving the Clear Fork Mobile Home Park. The inspection included a check of both the east and west extended aeration package plants. A few concerns were noted with the treatment plant operations.

The northern sludge return line on the west treatment plant was not operating. The operation of the sludge return lines is crucial to the proper operation of the treatment plant. The clarifier had a thick blanket of floating sludge that completely covered the surface of the tank. The surface of the clarifier should be clear of solids. The eastern treatment plant appeared in satisfactory condition however a heavy sludge blanket was also noted floating on the clarifiers in this plant.

The NPDES permit contains a schedule of compliance to install needed upgrades to the treatment system. The previous owner was in **violation** of several of the milestones contained in the schedule of compliance. The following is a listing of the **violations** of the NPDES permit 2PY00024 that have occurred since it was effective on June 1, 2006:

1. Failure to submit detail plans for plant improvements consisting of, at a minimum, tertiary treatment and disinfection facilities as soon as possible, but not later than 12 months from the effective date of the permit. A direct discharge to the river will also be required.
2. Failure to commence construction as soon as possible, but not later than 18 months from the effective date of the permit.
3. Failure to attain operational level of the treatment works and meet final effluent limitations as soon as possible, but not later than 24 months from the effective date of the permit.
4. Failure to maintain a Class I certified operator in charge of the treatment plants.

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5. Failure to submit Discharge Monitoring Reports (DMRs) for outfall 001 for the months of June, July, and August 2006, as well as September 2008 to November 2009. The DMR for outfall 588 was also not submitted in December 2008.
6. Failure to record the parameters Odor, Color, and Turbidity daily as required by the NPDES permit.
7. 107 violations of the limits contained in the NPDES permit.

Our office has considered this case for formal enforcement action for the above violations. We are however, willing to work with you to develop a new timeline to address these violations and bring the plant back into compliance in lieu of enforcement.

Summary:

In order to address the outstanding violations it will be necessary for you to respond to our office in writing **within 30 days** of receipt of this letter as to the intentions of Finsilver Freidman and those you represent regarding the completion of the necessary upgrades mentioned above.

Sincerely,



Walter Ariss
Environmental Specialist II
Division of Surface Water

/lb

pc: ~~NWDO-DSW-file~~
Kevin Dean, Dean's Backflow Service
Matt Work, Richland County Health Department