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

April 15, 2008

RE: LAKE COUNTY  
KIRTLAND  
EAGLE MOBILE HOME PARK  
NPDES PERMIT NO. 3PV00071  
APPLICATION NO. OH0103365

**NOTICE OF VIOLATION**

Ms. Mary Trunzo  
5101 Dogwood Trail  
Lyndhurst, OH 44124

Dear Ms. Trunzo:

On April 2, 2008, a compliance evaluation inspection of the sewage treatment plant serving Eagle Mobile Home Park was conducted by this writer. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

The sewage system is a 25,000 gallon a day extended aeration plant with tertiary treatment and disinfection facilities. The following observations were made at the time of inspection:

- The aeration tank was in operation.
- The settling tank contents were very turbid. The effluent trough contained an excessive amount of algae that should be removed. The concrete walls of the tank are crumbling at the top of the tank (See attached photograph). Repairs should be made to the tank.
- The surface of the northern filter beds 1 and 2 contained dried sludge that is in need of removal.
- Filter bed 4 showed some ponding of wastewater.
- Filter bed 3 was ponded with sewage and sludge to the top rim of the filter bed wall. A pump was observed in filter bed 3, discharging the standing wastewater in the bed to the filter discharge line (See attached photograph). By pumping the standing wastewater to the discharge line, the filtration unit was being bypassed. This act must cease. **The bypassing of a treatment unit is a violation of the NPDES permit and the permit-to-install that were issued for this plant.** The pump must be removed from the filter bed immediately, and maintenance work on all the beds must be performed to prevent the purported need to bypass.

All sludge, sludge laden sand and leaves must be removed from the surface of the sand filters. Each filter bed must contain 18 inches of Ohio EPA approved filter sand. Approved filter sand consists of clean and washed sand with an effective size between 0.4 and 1.0 mm and a uniformity coefficient not greater than 3.0. The filter sand must be raked and distributed evenly across the surface area of the filter bed.

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The disinfection season is from May 1<sup>st</sup> through October 31<sup>st</sup>. During this period chlorine tablets must remain in the chlorinator and sulfite tablets must remain in the dechlorinator. The plant discharge must be analyzed for chlorine residual every day during this time period. Please refer to Table 1 of the NPDES permit.

A review of the Discharge Monitoring Reports for Outfall 001 covering the period of January 2007 through February 2008 revealed the following violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	5.9	5/24/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	5/24/2007
001	00400	pH	1D Conc	6.5	6.	6/14/2007
001	00400	pH	1D Conc	6.5	5.8	6/28/2007
001	00400	pH	1D Conc	6.5	5.8	7/12/2007
001	00400	pH	1D Conc	6.5	5.8	7/19/2007
001	00400	pH	1D Conc	6.5	6.	7/26/2007
001	00400	pH	1D Conc	6.5	6.	8/2/2007
001	00400	pH	1D Conc	6.5	6.	8/13/2007
001	00400	pH	1D Conc	6.5	5.7	8/16/2007
001	00400	pH	1D Conc	6.5	6.1	8/23/2007
001	00400	pH	1D Conc	6.5	5.9	9/6/2007
001	00400	pH	1D Conc	6.5	5.6	9/27/2007
001	00400	pH	1D Conc	6.5	5.9	10/4/2007
001	00400	pH	1D Conc	6.5	5.4	10/11/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	4.8	11/14/2007

The following frequency violations were revealed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50060	Chlorine, Total Residual	1/Day	1	0	05/01/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/02/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/04/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/05/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/06/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/07/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/08/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/09/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/11/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/12/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/13/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/14/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/15/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/17/2007

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50060	Chlorine, Total Residual	1/Day	1	0	05/18/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/19/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/20/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/21/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/22/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/23/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/25/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/26/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/27/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/28/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/29/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/30/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	05/31/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/01/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/02/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/03/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/04/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/05/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/06/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/08/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/09/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/10/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/11/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/12/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/13/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/15/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/16/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/17/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/18/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/19/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/20/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/22/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/23/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/24/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/25/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/26/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/27/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/29/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	06/30/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/01/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/02/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/03/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/04/2007

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50060	Chlorine, Total Residual	1/Day	1	0	07/06/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/07/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/08/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/09/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/10/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/11/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/13/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/14/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/15/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/16/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/17/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/18/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/20/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/21/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/22/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/23/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/24/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/25/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/27/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/28/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/29/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/30/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	07/31/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/01/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/03/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/04/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/05/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/06/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/07/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/08/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/09/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/10/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/11/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/12/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/14/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/15/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/17/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/18/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/19/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/20/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/21/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/22/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/24/2007

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001	50060	Chlorine, Total Residual	1/Day	1	0	08/25/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/26/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/27/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/28/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/29/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/30/2007
001	50060	Chlorine, Total Residual	1/Day	1	0	08/31/2007

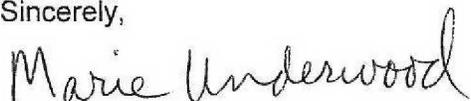
Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Pursuant to Ohio Administrative Code 3745-7-09, effective December 21, 2006, this Agency requires the owner and operator of record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. The records shall be housed on site and shall be accessible for twenty-four hour inspection. Some of the information that must be recorded includes the identification of the treatment works, date and times of arrival and departure for the operator of record, specific operation and maintenance activities that affect the quality or quantity of sewage or effluent produced, results of tests performed and samples taken, performance of preventative maintenance and repairs, and identification of the persons making the entries. In addition the administrative code requires any owner of a sewage treatment works who enters into a contract with a certified operator to maintain a copy of the contract onsite at the treatment works. Please carefully review Ohio Administrative Code 3745-7-09 for information on all requirements. The code can be accessed at: <http://www.epa.state.oh.us/dsw/rules/effectiverules.html>.

Within 10 days of the date of this letter, you are directed to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.  
Environmental Engineer  
Division of Surface Water

MU/mt

Enclosures





← FILTER BED 3 PONDED TO TOP OF FILTER BED WALL

FILTER BED 3 CONTAINING A PUMP THAT DISCHARGES TO FILTER DISCHARGE LINE





CRUMBLING OF CONCRETE AT TOP OF SETTLING TANK

