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4PV00116C

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State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

Certified Mail #91 7108 2133 3932 4450 1413

December 10, 2008

Mr. Robert Toland
55 DeWar Drive
Heath, OH 43056

**Re: Suburban Mobile Home Park
Ohio EPA Permit No.: 4PV00116*CD**

Dear Mr. Toland:

Attached to this letter is a report for a Reconnaissance Inspection that I performed November 20, 2008, at the wastewater treatment plant (WWTP) serving your mobile home park. I appreciate work that you have performed thus far in both the sanitary sewer collection system and WWTP. This work has likely reduced some of the hydraulic load delivered to the WWTP thus improving its wastewater treatment efficiency.

However, as indicated in the report and during my discussion with you during the inspection, additional work is necessary to provide consistent compliance with final effluent limitations which will go into effect July 1, 2009. As indicated in the report you must submit a Permit to Install (PTI) and detail plans for improvements. The PTI must be approved by this office prior to construction initiation.

During the inspection you asked for information regarding approximate cost for flow equalization, sand filters and ultraviolet disinfection. Discussion with John Owen in this office indicates the cost for WWTP upgrade to include the above three components may be in the range of forty to sixty thousand dollars.

This WWTP has been unable to demonstrate consistent compliance for an extended period of time. Failure to comply with the wastewater discharge permit effluent limitations and/or schedule of compliance will leave this office little choice but to initiate enforcement action in response to violations.

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

Mr. Robert Toland
Page -2-

If you have questions regarding this report I can be reached by telephone at 614-728-3850 or by e-mail at jan.rice@epa.state.oh.us.

Sincerely,

A handwritten signature in cursive script that reads "Jan Rice".

Jan A. Rice
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

JAR/nsm Suburban MHP 11-20-08

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. 4PV00116	NPDES No. OH0130737	Date 11/20/08	Inspection Type R	Inspector S	Facility Type 1
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B. FACILITY DATA

Name and Location of Facility Inspected Robert Toland dba Suburban Mobile Home Park WWTP 5823 Jacksontown Rd., SE Newark, Ohio 43055	Entry Time 12:30 P.M.	Permit Effective Date 7/1/07
	Exit Time 1:15 P.M.	Permit Expiration Date 6/30/12

Name(s) and Title(s) of On-Site Representative(s) Robert Toland, Owner	Phone Number(s) 740-928-3772
Name, Address and Title of Responsible Official Robert Toland (Owner/Operator), 55 Dewmar Drive SE, Heath, Ohio 43056	Phone Number 740-928-3772

C. AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

- U Permit – WWTP improvements construction not underway as required.
- N/S Records/Reports
- N Operations & Maintenance
- U Facility Site Review – WWTP improvements construction not underway as required.
- M Collection System – permittee has worked to minimize storm/ground water inflow/infiltration into collection system.
- M Flow Measurement – well meter readings do not reflect wet weather peak flows.
- N Laboratory
- U/U Effluent/Receiving Waters – interim effluent limitation violations as well as sludge in the receiving stream.
- N Sludge Storage/Disposal
- N Pretreatment
- U Compliance Schedules – compliance schedule milestone dates have been missed.
- S Self-Monitoring Program
- Other

D. SUMMARY OF FINDINGS/COMMENTS (See Attachments)

Jan Rice
Jan Rice/Inspector, Ohio EPA, Central District Office

Erin Sherer
Erin Sherer, Reviewer, Ohio EPA, Central District Office

12/10/08
Date

12/12/08
Date

Attachment "A"
Suburban MHP
Summary of Findings/Comments

The wastewater discharge permit requires that this WWTP be under supervision of a Class A or higher state certified wastewater operator. Mr. Toland received his Limited Class "A" wastewater operator certification on August 20, 2008, and now oversees and operates this WWTP.

The wastewater discharge permit for this WWTP shows the design flow to be 6,000 gallons per day. Monthly operating report data shows that the WWTP is discharging approximately 3,000 – 4,000 gallons per day. Reported flow data is, however, based on the MHP well water pump meter readings and is not representative of wet weather peak flows detrimental to operation of this WWTP.

This issue has been discussed with the MHP owner. In January, 2005, Jan Rice and John Owen agreed with Mr. Toland to allow additional time for further inspection and improvement of the MHP sanitary sewer collection system to minimize storm/ground water inflow/infiltration (I/I) into the system. Completion of I/I removal work would hopefully help reduce WWTP improvements cost. In January, 2005, Mr. Toland was advised that partial WWTP modification would be necessary to include flow equalization, tertiary treatment, and disinfection.

A letter dated October 1, 2008, from the owner is attached to this report. The letter summarizes work done to improve the sanitary sewer collection system and WWTP. Even though work completed thus far has been beneficial, such work has not negated the need to proceed with WWTP improvements discussed in January, 2005.

Effluent limitations violations are listed in Attachment "B" of this report. It should be noted that the listed violations relate to the interim, not the final, effluent limitations table. Final effluent limitations are more restrictive and become effective July 1, 2009.

The wastewater discharge permit contains a schedule for submittal of a Permit to Install (PTI) and detail plans for improvements. The PTI and plans were to have been submitted by January 1, 2008 and construction started by July 1, 2008. Neither a PTI nor plans has been submitted and construction has not been initiated for installation of flow equalization, tertiary treatment and disinfection equipment. Construction completion and compliance with final effluent limitations must occur by July 1, 2009.

Inspection of the stream which receives wastewater from this MHP showed significant deposits of sludge lost from this WWTP. Photographs of the WWTP and stream are included in this report. The exact cause of the sludge loss is unknown. It is known that installation of tertiary treatment in the form of sand filters will help prevent sludge loss to the creek. Part III, Item 2A in this wastewater discharge permit reads as follows:

The effluent shall, at all times, be free of substances:

A. In amounts that will settle to form putrescent, or otherwise objectionable, sludge deposits; or that will adversely affect aquatic life or water fowl;

Attachment "A"
Suburban MHP

Failure to comply with the wastewater discharge permit effluent limitations and/or schedule of compliance will leave this office little choice but to initiate enforcement action in response to violations.

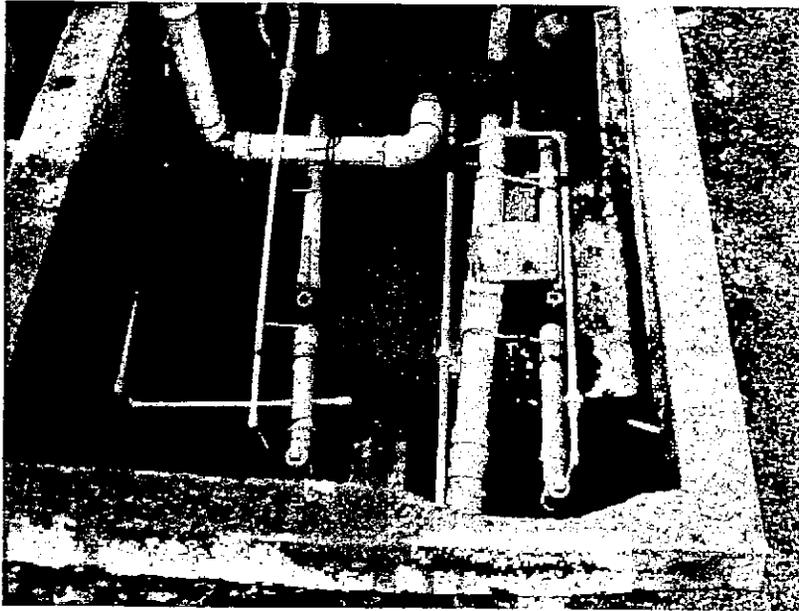


Figure 1. This is a photograph of the Suburban MHP WWTP.

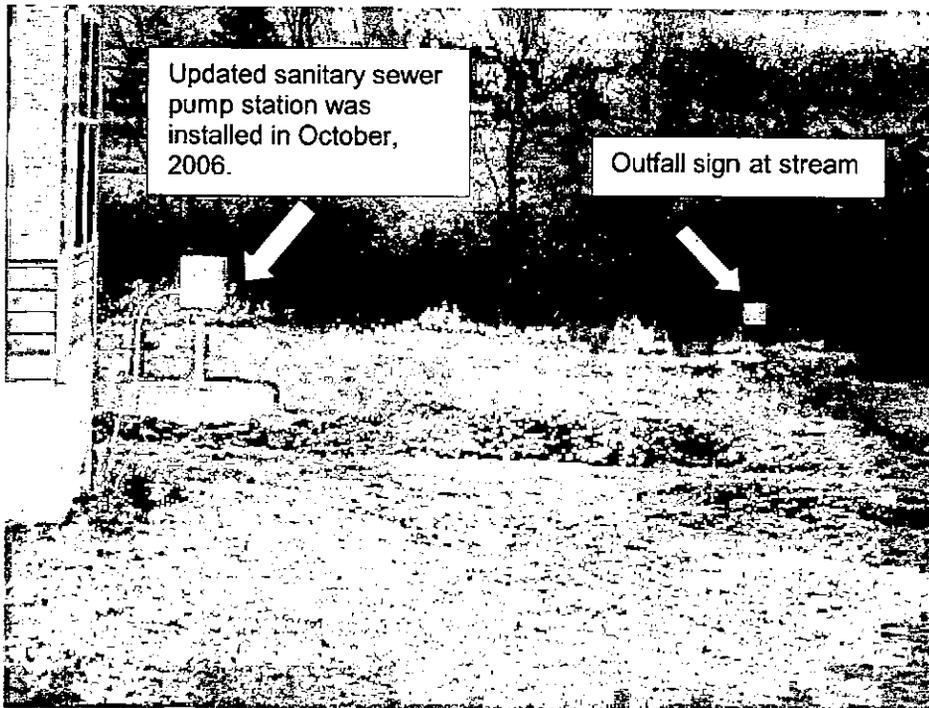


Figure 2.

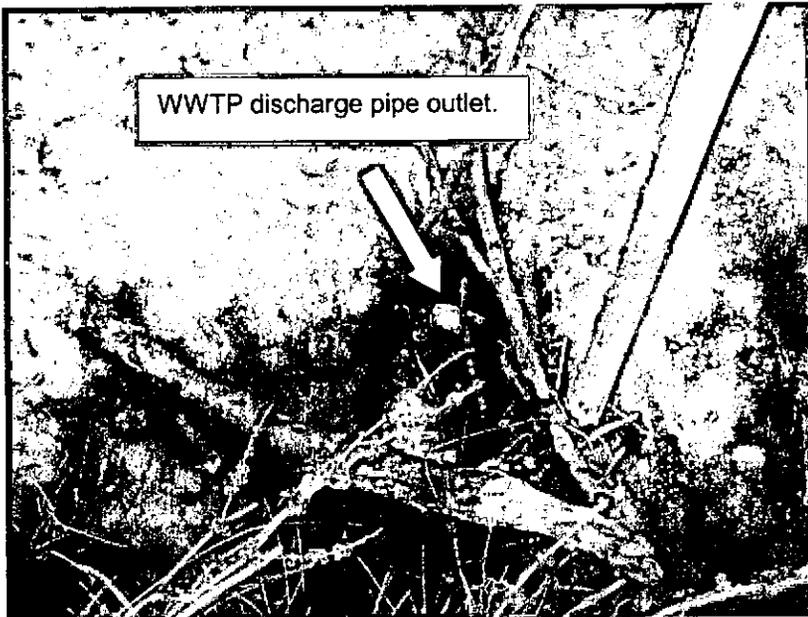


Figure 3.

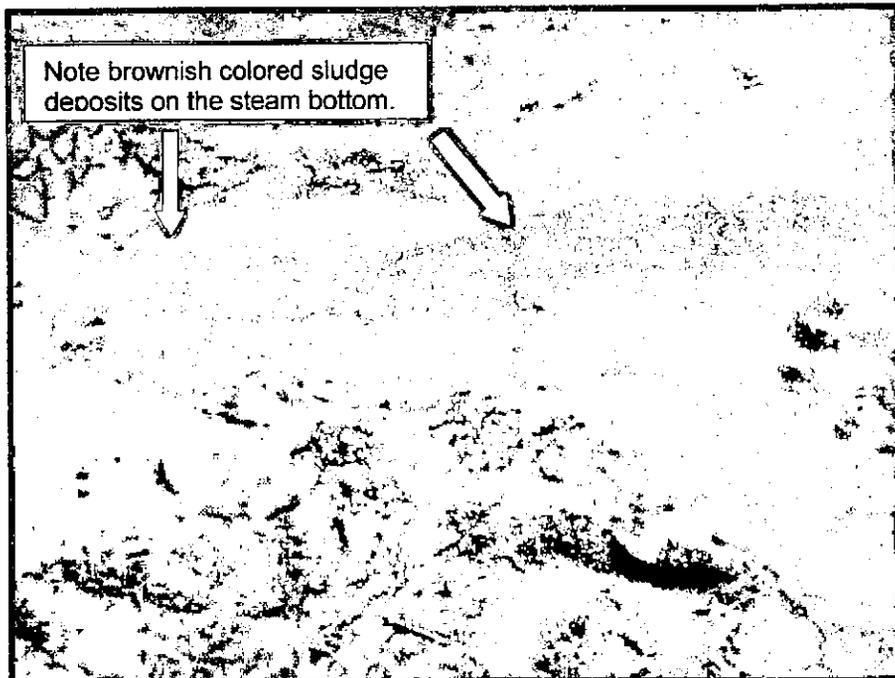


Figure 4.

Attachment "B"
Suburban MHP

Interim Effluent Limitations Violations
Monitoring Station 4PV00116001
1/1/08 – 11/30/08

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PV00116*CD	February 2008	001	80082	CBOD 5 day	30D Conc	25	38.	2/1/2008
4PV00116*CD	May 2008	001	31616	Fecal Coliform	30D Conc	1000	5200.	5/1/2008
4PV00116*CD	May 2008	001	31616	Fecal Coliform	1D Conc	2000	5200.	5/12/2008

Compliance Schedule Violations

Facility	Permit No	App No	Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type
Suburban MHP	4PV00116*CD	OH0130737	7/1/2007	6/30/2012	1/1/2008		1799	Construction
Suburban MHP	4PV00116*CD	OH0130737	7/1/2007	6/30/2012	7/1/2008		3099	Construction

