



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

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

Re: Huron County  
Firelands Manor MHP  
**Notice of Violation (NOV)**

June 30, 2010

Mr. Dan Inks  
I&R Properties, Inc.  
dba Firelands Manor MHP  
9 Corporation Center  
Broadview Heights, Ohio 44147

Dear Mr. Inks,

On June 22, 2010, a brief inspection was made of the wastewater treatment plant serving the Firelands Manor MHP (WWTP). Firelands Manor MHP operates under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PY00017. At the time of the inspection the plant was operating. Our comments and recommendation are as follows:

1. The flow equalization tank was online and being aerated. The contents were a light brown/grey color and there was a slight odor.
2. At the time of the inspection the contents of the aeration tank were light brown/grey and no foam was observed.
3. The sludge return appeared to be returning clear water to the aeration tank. We suggest that the sides of the clarifier be scrapped gently to direct sludge towards the return pump. In addition you may want to consider adjusting the return pumping rate so that it is slower.
4. The surface sand filters had very light sludge build up and some weed growth.
5. The contents of chlorine contact appeared clear.
6. A log book was not accessible onsite in order to determine compliance with the recordkeeping requirements of Ohio Administrative Code (OAC) Chapter 3745-7-09. You have been informed of these record keeping requirements in our inspection letters for your facilities.

The record keeping requirements need to be met at Firelands MHP WWTP and provisions need to be made so that a minimum of the previous three months of operation and maintenance records are maintained and are easily accessible onsite for 24 hour inspection by Ohio EPA. Similar facilities have installed a mailbox near the WWTP so that these records are available for Ohio EPA inspections. In addition to operations and maintenance activities, the log book should indicate the arrival and departure time of your plant operator. Please be aware that the minimum staffing requirements of OAC 3745-7-04 and Part II, Item 3, of your NPDES permit require your operator of record to be physically present at the facility a minimum of 3 days per week for a minimum of 1.5 hours per week.

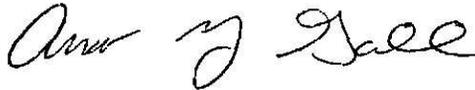
7. A review of your discharge monitoring reports (DMR's) since our last inspection shows violations **of the Nitrogen Ammonia (NH<sub>3</sub>), Total Suspended Solids (TSS), Fecal Coliform and CBOD 5 day limits of your NPDES permit. This plant is still in significant non-compliance with its NPDES permit.** A copy of these violations is enclosed. It was indicated in a letter dated March 31, 2010, that these violations are being caused by an Inflow/Infiltration (I/I) problem with the collection system. Please be aware that your NPDES permit requires you to come into compliance with final effluent limits by September 2010. **Please be aware that failure to meet final effluent limits will result in escalated enforcement action pursuant to Ohio Revised Code, Chapter 6111 in order to achieve compliance.**
8. We have received your response letters to the preliminary compliance reviews that are conducted on your submitted DMR's. Your letters repeatedly state that "we have been continually working to resolve I&I problems and that should help correct our violations". However, no further detail is given. For future responses please provide more details indicating what work has been completed on the collection system to resolve the I&I problems or what improvements/changes have been made to the operation of the wastewater treatment plant. Also, please be aware that the response letter is not deemed appropriate unless it is signed and dated.

**Within fourteen (14) days of receiving this inspection letter, please submit a written response indicating how the above noted items will be addressed.** A copy of our inspection report is enclosed for your review.

Mr. Dan Inks  
June 30, 2010  
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If you have any questions regarding the inspection or this letter, please contact me at (419) 373-3003 or via email at [andrew.gall@epa.state.oh.us](mailto:andrew.gall@epa.state.oh.us)

Sincerely,



Andrew Y. Gall  
Environmental Specialist II  
Division of Surface Water

/llr

Enclosures

pc: Huron County Health Department  
(CDSW-NWDO File w/enclosures...)

ec: Lyn Makeever, Makeever and Associates, Inc. ([rmakeever@makeever.com](mailto:rmakeever@makeever.com))  
Steve Paliga, Project Manager I&R Properties, Inc. ([spaliga@irprop.com](mailto:spaliga@irprop.com))

Get New Data

Firelands Manor MHP - Detail Report Limit Violations 06/01/2009 to 06/01/2010

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit/Type	Limit	Reported Value	Violation Date
2PY00017*DD	August 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.605	8/1/2009
2PY00017*DD	August 2009	001	31616	Fecal Coliform	30D Conc	1000	3800.	8/1/2009
2PY00017*DD	August 2009	001	31616	Fecal Coliform	1D Conc	2000	3800.	8/5/2009
2PY00017*DD	August 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.	8/18/2009
2PY00017*DD	November 2009	001	00530	Total Suspended Solids	1D Conc	18.0	29.	11/30/2009
2PY00017*DD	November 2009	001	80082	CBOD 5 day	1D Conc	15.0	23.	11/30/2009
2PY00017*DD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	12.7685	1/1/2010
2PY00017*DD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.41	.54746	1/1/2010
2PY00017*DD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	24.7	1/6/2010
2PY00017*DD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.62	1.02838	1/6/2010
2PY00017*DD	January 2010	001	80082	CBOD 5 day	1D Conc	15.0	18.	1/13/2010
2PY00017*DD	March 2010	001	00530	Total Suspended Solids	1D Conc	18.0	38.	3/10/2010
2PY00017*DD	March 2010	001	00530	Total Suspended Solids	1D Qty	2.45	5.60937	3/10/2010
2PY00017*DD	May 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.06667	5/1/2010
2PY00017*DD	May 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	5.78	5/26/2010

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION  
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PY00017

Facility Name Firelands Manor Expiration Date 05/31/2014

Facility Address 5810 US Hwy 20 East Date 6/22 Time 12:45 am / (pm)

City Wakeman County Huron Township Wakeman

Name and Address of Owner I ER Properbs 9 Corporation Ctr., Broadview Heights, OH 44117

Person Contacted \_\_\_\_\_ Owner Phone \_\_\_\_\_

Flow: Design \_\_\_\_\_ GPD Present 5000 GPD (metered - estimated)

Trib. Pop. \_\_\_\_\_ (actual - estimated) Weather at time of inspection: Temp 80° Sunny

OEPA Personnel Andrew Ball District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None	<input checked="" type="checkbox"/>	Clear	<input checked="" type="checkbox"/>	None	<input checked="" type="checkbox"/>	Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: Not Observed

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has \_\_\_\_\_ excellent \_\_\_\_\_ good  fair \_\_\_\_\_ poor operation  
 b. Plant has \_\_\_\_\_ excellent  good \_\_\_\_\_ fair \_\_\_\_\_ poor maintenance  
 c. Sand filters have \_\_\_\_\_ excellent \_\_\_\_\_ good  fair \_\_\_\_\_ poor maintenance

d. Not operating at expected efficiency due to:

- (1) \_\_\_\_\_ hydraulic overload  
 (2) \_\_\_\_\_ organic/ solids overload  
 (3) \_\_\_\_\_ personnel inefficiency  
 (4) \_\_\_\_\_ equipment failure  
 (5) \_\_\_\_\_ wastes  
 (6) \_\_\_\_\_

Disinfection: (Required May 1 thru Oct.31.)	
IN	OUT
<input checked="" type="checkbox"/>	_____ Chlorination Tablets
<input checked="" type="checkbox"/>	_____ Dechlorination Tablets
_____	_____ U.V.

Yes No

4.  Compliance with NPDES Permit  
 Periodic Violations Y N Parameters: \_\_\_\_\_  
 Chronic Violations  NH<sub>3</sub>, TSS, CBOD

5.  Adequate plant safety Locked Gate and Fence  
 6.  Operation and Maintenance Service Name Makeover and Associates, Inc.  
 Frequency of Visits ??

Facility Name: Fieland Manor MHP

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
	1	Flow Equalization	Aerated Online, Light Brown Grey Color Slight odor
Aeration Equipment	2	Plant Timer ___Y___N	Cycle Time:
		Motor/ Blower Unit	Plant operating Aeration On
Secondary Treatment	1	Aeration Tank	Color: Light Brown and Grey Adequate Aeration: Y <input checked="" type="checkbox"/> N ___
Final Settling	1	Clarifier	—
	1	Sludge Return	In <input checked="" type="checkbox"/> Out Clear, constantly on - <sup>Should</sup> <del>needs</del> to be adjusted
	1	Surface Skimmer	In Out " "
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	West Sand Filter slight Sludge Build-up East Sand Filter has slight Sludge Build-up and need growth
		Polishing Pond	
		Other	
Disinfection	1	Contact Tank	Approved Clear
	1	Chlorine Tube Feeder	
	1	Dechlorination Tube Feeder	
	W/A	Ultraviolet (UV)	
Flow Metering		Elapsed Pump Time	
		Recorder. (continuous total)	
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling	1	Aerated Storage Tank	Portable Pump used to transfer sludge
		Sludge Drying Bed	
Sludge Disposal	1	Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment	1	Post Aeration	
		Spray Irrigation	
		Other	