



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: Huron County
Willard Mobile Home Park
Notice of Violation (NOV)

August 8, 2008

Mr. Dan Inks
IRBW Properties Ltd.
dba Willard Mobile Home Park
9 Corporation Center
Broadview Heights, Ohio 44147

Dear Mr. Inks,

On July 22, 2008, I conducted an inspection of the wastewater treatment plant serving the Willard Mobile Home Park which is currently operating under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PY00052*BD. At the time of my inspection the plant was operating, although no effluent was observed being discharged to the stream. No samples were taken to verify compliance with permit limits. In general the operation and maintenance of the plant appeared "poor". Our observations and recommendations are as follows:

1. The contents of the aeration tank were light brown, which is normal. The rate of aeration appeared to be adequate.
2. The clarifier water appeared mostly clear although some scum and solids were floating on the top.
3. The sand filters were in very poor condition. (See enclosed photos) The north filter was covered with a layer of sludge and solids and needs to be cleaned. A bypass pipe had been installed to bypass the south filter and the chlorine contact tank. **This is a violation of Part III of your NPDES permit which states "At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with terms and conditions of this permit". Therefore, the by-pass line should be removed immediately and the sand filters need to be cleaned and placed back into service as soon as possible.** Please note that the bypass pipe may have contributed to the fecal coliform limit violations that occurred on June 1, 2008.
4. Please be aware that new Operator Certification Rules, Ohio Administrative Code Chapter 3745-07-09 are in effect and contain record keeping requirements. A copy of the recording keeping portion of the rule is enclosed. We request that you make sure that all of the appropriate records are being maintained and will be accessible on site.
5. A review of your discharge monitoring reports (DMR's) since our last inspection shows violations of the Nitrogen Ammonia (NH₃), Total Suspended Solids (TSS), pH, Dissolved Oxygen, 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

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has been indicated that these violations are being caused by an Inflow/Infiltration (I/I) problem with the collection system. Your NPDES permit contains a compliance schedule to complete improvements to the sanitary sewer system and the wastewater treatment plant to address this problem and meet final effluent limits no later than October, 2008. An October 31, 2007 letter from Susan Somers of your office indicated that numerous repairs have been made to the collection system in an attempt to address the permit violations. However, compliance with the permit limits has not improved. We strongly recommend that you evaluate the need for additional improvements or consider increasing the amount of time your operator is present at the plant in order to come into compliance and meet final effluent limits by October, 2008.

Please be aware that if these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action pursuant to Ohio Revised Code, Chapter 6111 in order to achieve compliance.

Within fourteen (14) days of receiving this inspection letter, please submit a written response indicating how the above noted items will be addressed and the steps that are being taken to meet the compliance schedule. 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

Sincerely,



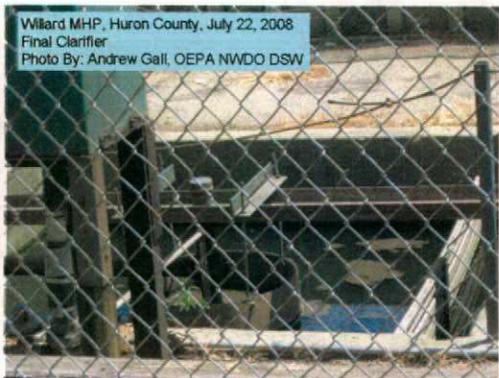
Andrew Y. Gall
Environmental Specialist II
Division of Surface Water

/lb

Enclosures

pc: Mr. Robert Lyn Makeever, Operator w/enclosures
Huron County Health Department
~~NWDO-DSW:File w/enclosures~~

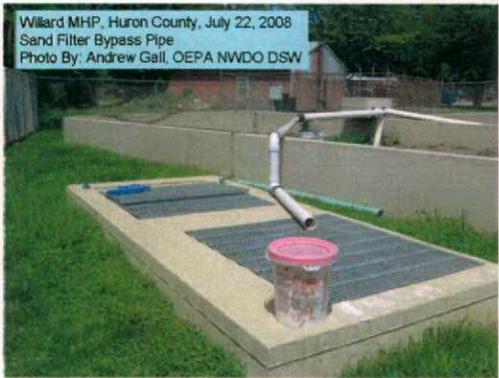
Willard MHP, Huron County, July 22, 2008
Final Clarifier
Photo By: Andrew Gall, OEPA NWDO DSW



Willard Mobile Home Park, Huron County, July 22, 2008
North Sand Filter
Photo Taken By: Andrew Gall, OEPA NWDO DSW



Willard MHP, Huron County, July 22, 2008
Sand Filter Bypass Pipe
Photo By: Andrew Gall, OEPA NWDO DSW



Willard MHP, Huron County, July 22, 2008
South Sand Filter and Bypass Pipe
Photo By: Andrew Gall, OEPA NWDO DSW



Willard MHP, Huron Co., July 22, 2008
Chlorine Contact Tank and Bypass Pipe
Photo By: Andrew Gall, OEPA NWDO DSW

