



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)

July 13, 2009

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

Dear Mr. Inks,

On June 10, 2009, 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. The operation and maintenance of the plant appeared "poor". Our observations and recommendations are as follows:

1. The blower was operating and the contents of the aeration tank were light brown/grey.
2. The clarifier water appeared murky and some scum and solids were floating on the top.
3. The sand filters were in very poor condition. Both filters were covered with a layer of sludge and solids and needed to be cleaned. Once again a bypass pipe had been installed to bypass the sand filters 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 has probably contributed to the total suspended solids and fecal coliform limit violations that have occurred.

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4. In our August 8, 2008 inspection letter you were informed of the record keeping requirements and responsibilities of a certified operator that are contained within Ohio Administrative Code Chapter 3745-07-09. In Susan Sommer's August 21, 2008 letter it was indicated that the appropriate records would be available at the manger's home and corporate office. Please provide us with the current manager's contact information so that these records can be reviewed at the time of our inspection. In addition, please provide us with updated contact information if there is a change in managers. **Since we were unable to review the records at the time of our inspection please submit copies of the required records that have been maintained since our July 22, 2008 inspection with your response to this letter.**

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 has been indicated that these violations are being caused by an Inflow/Infiltration (I/I) problem with the collection system. A Permit to Install (PTI) for plant improvements and upgrades was issued on February 2, 2009. At the time of the inspection construction had not yet been started. Please be aware that issuance of this PTI does not relieve you of the responsibility of meeting final effluent limits for the existing plant. We strongly recommend that you increase the amount of time your operator is present at the plant in order to come into compliance with final effluent limits. **Please be aware that if these violations continue to occur and if satisfactory progress is not made, enforcement action pursuant to Ohio Revised Code, Chapter 6111 may be implemented in order to achieve compliance.**

6. 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 detail 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.

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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. 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~~

OHIO ENVIRONMENTAL PROTECTION AGENCY

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

NPDES Permit No. 2P400052*BD

Facility Name Willard MHP Expiration Date 6/30/2012
 Facility Address 3265 Neal Zick Rd. Date 6/10/09 Time 11:15 am
 City Willard County Huron Township New Haven
 Name and Address of Owner IRBW Properties Ltd., 9 Corporation Center, Broadview Heights, OH 44147
 Person Contacted _____ Owner Phone 440-838-4863
 Flow: Design 15,000 GPD Present _____ GPD (metered - estimated)
 Trib. Pop. 75 lots (actual estimated) Weather at time of inspection: Temp 75° Partly Cloudy
 OEPA Personnel Andrew Gall District NWDO

1. Plant Effluent - Mark Severity No.

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

2. Effect of effluent on Receiving Stream Name: Not Observed - High Weed Growth

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 X fair _____ poor operation
 b. Plant has _____ excellent _____ good X fair _____ poor maintenance
 c. Sand filters have _____ excellent _____ good _____ fair X 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		
_____	_____	Chlorination Tablets	<u>Not</u>
_____	_____	Dechlorination Tablets	<u>Observed</u>
_____	_____	U.V.	

Yes No

4. X Compliance with NPDES Permit

Periodic Violations X N Parameters: _____
 Chronic Violations X _____

5. X Adequate plant safety Locked Gate

6. X Operation and Maintenance Service Name Lyn Makeover

Frequency of Visits ?

Facility Name: Willard Mill

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment	1	Plant Timer ___Y___N ??? Motor/ Blower Unit <i>Blower</i>	Cycle Time: ?
Secondary Treatment	1	Aeration Tank	Color: <i>Light Grey/Brown</i> Adequate Aeration: Y <input checked="" type="checkbox"/> N ___
Final Settling	1	Clarifier	<i>Light solids, murky</i> <i>Some solids in water</i>
		Sludge Return	In X Out <i>Returning clear water</i>
		Surface Skimmer	In X Out " " "
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	<i>Sand filters being bypassed &</i>
		Polishing Pond	<i>Filters plugged with sludge/solids/weeds</i>
		Other	
Disinfection		Contact Tank - k	
	1	Chlorine Tube Feeder	<i>Not observed } Gate Locked</i>
	1	Dechlorination Tube Feeder	<i>Not observed }</i>
		Ultraviolet (UV)	
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
	1	Sand Filter Effluent Dosing	
Sludge Handling		Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal		Municipal POTW	<i>Bagged solids next to filters</i>
		Landfill	<i>should be properly disposed</i>
		Land Application	
Advanced Treatment	1	Post Aeration	<i>not observed</i>
		Spray Irrigation	
		Other	

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00052*BD	October 2008	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6	10/22/2008
2PY00052*BD	December 2008	001	80082	CBOD 5 day	30D Qty	0.57	1.8925	12/1/2008
2PY00052*BD	December 2008	001	80082	CBOD 5 day	1D Qty	0.85	1.8925	12/10/2008
2PY00052*BD	January 2009	001	80082	CBOD 5 day	30D Conc	10	13.	1/1/2009
2PY00052*BD	March 2009	001	00530	Total Suspended Solids	30D Conc	12	42.	3/1/2009
2PY00052*BD	March 2009	001	00530	Total Suspended Solids	30D Qty	0.68	1.43073	3/1/2009
2PY00052*BD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	23.6	3/1/2009
2PY00052*BD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.17	.80393	3/1/2009
2PY00052*BD	March 2009	001	80082	CBOD 5 day	30D Conc	10	40.	3/1/2009
2PY00052*BD	March 2009	001	80082	CBOD 5 day	30D Qty	0.57	1.3626	3/1/2009
2PY00052*BD	March 2009	001	00530	Total Suspended Solids	1D Conc	18	42.	3/4/2009
2PY00052*BD	March 2009	001	00530	Total Suspended Solids	1D Qty	1.0	1.43073	3/4/2009
2PY00052*BD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	23.6	3/4/2009
2PY00052*BD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.256	.80393	3/4/2009
2PY00052*BD	March 2009	001	80082	CBOD 5 day	1D Conc	15	40.	3/4/2009
2PY00052*BD	March 2009	001	80082	CBOD 5 day	1D Qty	0.85	1.3626	3/4/2009
2PY00052*BD	April 2009	001	00530	Total Suspended Solids	1D Conc	18	34.	4/1/2009
2PY00052*BD	April 2009	001	00530	Total Suspended Solids	30D Conc	12	34.	4/1/2009
2PY00052*BD	April 2009	001	00530	Total Suspended Solids	1D Qty	1.0	1.2869	4/1/2009
2PY00052*BD	April 2009	001	00530	Total Suspended Solids	30D Qty	0.68	1.2869	4/1/2009
2PY00052*BD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	26.1	4/1/2009
2PY00052*BD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	26.1	4/1/2009
2PY00052*BD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.256	.98789	4/1/2009
2PY00052*BD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.17	.98789	4/1/2009
2PY00052*BD	April 2009	001	80082	CBOD 5 day	1D Conc	15	32.	4/1/2009
2PY00052*BD	April 2009	001	80082	CBOD 5 day	30D Conc	10	32.	4/1/2009
2PY00052*BD	April 2009	001	80082	CBOD 5 day	1D Qty	0.85	1.2112	4/1/2009
2PY00052*BD	April 2009	001	80082	CBOD 5 day	30D Qty	0.57	1.2112	4/1/2009
2PY00052*BD	May 2009	001	00530	Total Suspended Solids	30D Conc	12	200.	5/1/2009
2PY00052*BD	May 2009	001	00530	Total Suspended Solids	30D Qty	0.68	9.084	5/1/2009
2PY00052*BD	May 2009	001	31616	Fecal Coliform	30D Conc	1000	6300.	5/1/2009
2PY00052*BD	May 2009	001	80082	CBOD 5 day	30D Conc	10	13.	5/1/2009
2PY00052*BD	May 2009	001	80082	CBOD 5 day	30D Qty	0.57	.59046	5/1/2009
2PY00052*BD	May 2009	001	00530	Total Suspended Solids	1D Conc	18	200.	5/13/2009
2PY00052*BD	May 2009	001	00530	Total Suspended Solids	1D Qty	1.0	9.084	5/13/2009
2PY00052*BD	May 2009	001	31616	Fecal Coliform	1D Conc	2000	6300.	5/13/2009