



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: **Notice of Violation**
Huron County
Willard MHP
Ohio EPA Permit No. 2PY00052

March 3, 2010

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

Dear Mr. Inks:

We are in receipt of your self-monitoring report covering the months of August 2009 through January 2010 for the wastewater treatment plant serving your facility. Our review indicates violations of the conditions of your NPDES permits. Further review indicates that you are in significant non-compliance (SNC) with several effluent limitations contained in that NPDES permit. The specific instances of noncompliance are attached on a separate sheet.

The following web address contains useful eDMR submission information including definitions of limit violations, nonnumeric violations, frequency violations, calculation of average concentrations, and correct A-code use; <http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>.

Within **14 days** of receiving this letter, please inform this office in writing as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in your Part III-General conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U. S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614)644-3469.

Mr. Dan Inks
March 3, 2010
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If there are any questions, please contact me at (419) 373-3003.

Sincerely,



Andrew Y. Gall
Division of Surface Water

/cs

Enclosure

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

Detail - Limit Violations

Permit: 2PY00052

Period: 8/1/2009 1/31/2010

Permit No	Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Aug 2009	001	00610	Nitrogen, Ammonia (30D Conc		2.0	3.4	8/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Aug 2009	001	00610	Nitrogen, Ammonia (1D Conc		3.0	3.4	8/5/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	00610	Nitrogen, Ammonia (30D Conc		2.0	9.1	9/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	00610	Nitrogen, Ammonia (30D Qty		0.113	.20666	9/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	00610	Nitrogen, Ammonia (1D Conc		3.0	9.1	9/2/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	00610	Nitrogen, Ammonia (1D Qty		0.17	.20666	9/2/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	50060	Chlorine, Total Resid 1D Conc		0.019	.08	9/2/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	00300	Dissolved Oxygen 1D Conc		5.0	4.88	9/16/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	50060	Chlorine, Total Resid 1D Conc		0.019	.06	9/16/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	00300	Dissolved Oxygen 1D Conc		5.0	2.54	9/23/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Sep 2009	001	50060	Chlorine, Total Resid 1D Conc		0.019	.08	9/30/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	00610	Nitrogen, Ammonia (30D Qty		0.113	.36487	10/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	00610	Nitrogen, Ammonia (30D Conc		2.0	24.1	10/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	31616	Fecal Coliform 30D Conc		1000	2100.	10/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	00610	Nitrogen, Ammonia (1D Conc		3.0	24.1	10/14/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	00610	Nitrogen, Ammonia (1D Qty		0.17	.36487	10/14/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	31616	Fecal Coliform 1D Conc		2000	2100.	10/14/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Oct 2009	001	50060	Chlorine, Total Resid 1D Conc		0.019	.07	10/28/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Nov 2009	001	00610	Nitrogen, Ammonia (30D Conc		3.0	3.4	11/1/2009
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	00530	Total Suspended Sol 30D Qty		0.68	1.09765	1/1/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	00530	Total Suspended Sol 30D Conc		12	58.	1/1/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	80082	CBOD 5 day 30D Qty		0.57	1.55185	1/1/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	80082	CBOD 5 day 30D Conc		10	82.	1/1/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	00530	Total Suspended Sol 1D Conc		18	58.	1/6/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	00530	Total Suspended Sol 1D Qty		1.0	1.09765	1/6/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	80082	CBOD 5 day 1D Conc		15	82.	1/6/2010
2PY00052*BD	IRBW Properties Ltd dba Williard MHP	Jan 2010	001	80082	CBOD 5 day 1D Qty		0.85	1.55185	1/6/2010

Detail - Frequency Violations

Permit: 2PY00052

Period: 8/1/2009 1/31/2010

Permit No	Reporting Period	Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
2PY00052*BD	October 2009	10/22/2009	001	00010	Water Temperature	1/Week	1	0
2PY00052*BD	October 2009	10/22/2009	001	00300	Dissolved Oxygen	1/Week	1	0
2PY00052*BD	December 2009	12/1/2009	001	00010	Water Temperature	1/Week	1	0
2PY00052*BD	December 2009	12/8/2009	001	00010	Water Temperature	1/Week	1	0
2PY00052*BD	December 2009	12/1/2009	001	00300	Dissolved Oxygen	1/Week	1	0
2PY00052*BD	December 2009	12/8/2009	001	00300	Dissolved Oxygen	1/Week	1	0