



**Environmental  
Protection Agency**

**John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director**

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

February 4, 2011

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

Dear Mr. Inks:

On December 16, 2010, and January 4, 2011, I conducted inspections of the wastewater treatment plant serving the Willard Mobile Home Park which is operating under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PY00052\*BD. The purpose of the inspections was to check progress on the outstanding issues that needed to be addressed in response to the complaint received by Ohio EPA on November 16, 2010, regarding sewage leaking from the plant and associated odors. Our inspection observations and comments are as follows:

1. It was noted that a chain link fence has been installed around the plant.
2. The new treatment plant tanks still had not been backfilled. It appeared that some gravel had been delivered to the site for use in backfilling the tanks.
3. There was still standing water between the tanks and it appeared to be a combination of rainwater and sewage. The water was black and had solids floating in it. (see attached photos) In conversations with your operator, Mr. Bob Davis, it was indicated that a contractor had been onsite to reseal the tanks that were leaking. The tanks should be inspected again to ensure that all the leaks have been sealed. Also, the Fernco connections on the pipes between the tanks should be inspected to ensure that they are watertight and not leaking sewage.
4. It appeared that there may still be some minor piping and electrical work that needs to be completed. This includes installing the rubber isolation bushings on the blower covers that Mr. Davis indicated would be installed to help reduce the noise associated with the blower operations.
5. The sand filters were online. It was noted that the sand level was extremely low. This should be addressed by adding more sand to the filters. The sand should be maintained at the level and type specified in the PTI that was approved for the sand filter installation.

Mr. Dan Inks  
February 4, 2011  
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6. It was also noted that the record keeping requirements outlined in our previous inspection letters still need to be addressed.
7. A review of the September and October 2010 discharge monitoring reports (DMR) shows continued effluent limit violations of the Nitrogen Ammonia (NH<sub>3</sub>), CBOD5 and Dissolved Oxygen parameters of your permit. A copy of the violations is enclosed. **The facility remains in significant non-compliance with the final effluent limits.**

A copy of our inspection photos is enclosed. 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

/cs

Enclosures

pc: Huron County Health Department  
NWDO-DSW File w/enclosures

**Limit Violations**

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00052*BD	September 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	3.28	9/29/2010
2PY00052*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	14.2	10/1/2010
2PY00052*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.113	.37623	10/1/2010
2PY00052*BD	October 2010	001	80082	CBOD 5 day	30D Conc	10	11.	10/1/2010
2PY00052*BD	October 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.01	10/13/2010
2PY00052*BD	October 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.28	10/20/2010
2PY00052*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	14.2	10/27/2010
2PY00052*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.37623	10/27/2010

1. POLLUTANT	2. PRESENT ?	2. EFFLUENT						3. UNITS		4. INTAKE		d. NO. OF ANALYSES
		a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE <i>(if available)</i>		c. LONG TERM AVRG. VALUE <i>(if available)</i>		<i>(specify if blank)</i>		a. LONG TERM AVERAGE VALUE		
		(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	
<b>GC/MS Fraction - Base/Neutral Compounds</b>												
N-Nitrosodimethylamine	<input type="checkbox"/>							mg/l	kg/day			
N-Nitrosodi-N-Propylamine	<input type="checkbox"/>							mg/l	kg/day			
N-Nitrosodiphenylamine	<input type="checkbox"/>							mg/l	kg/day			
Phenanthrene	<input type="checkbox"/>							mg/l	kg/day			
Pyrene	<input type="checkbox"/>							mg/l	kg/day			
1,2,4-Trichlorobenzene	<input type="checkbox"/>							mg/l	kg/day			
<b>GC/MS Fraction - Pesticides</b>												
Aldrin	<input type="checkbox"/>							mg/l	kg/day			
Alpha-BHC	<input type="checkbox"/>							mg/l	kg/day			
Beta-BHC	<input type="checkbox"/>							mg/l	kg/day			
Gamma-BHC	<input type="checkbox"/>							mg/l	kg/day			
Delta-BHC	<input type="checkbox"/>							mg/l	kg/day			
Chlordane	<input type="checkbox"/>							mg/l	kg/day			
4,4-DDT	<input type="checkbox"/>							mg/l	kg/day			
4,4-DDE	<input type="checkbox"/>							mg/l	kg/day			
4,4-DDD	<input type="checkbox"/>							mg/l	kg/day			
Dieldrin	<input type="checkbox"/>							mg/l	kg/day			
Alpha-Endosulfan	<input type="checkbox"/>							mg/l	kg/day			
Beta-Endosulfan	<input type="checkbox"/>							mg/l	kg/day			
Endosulfan Sulfate	<input type="checkbox"/>							mg/l	kg/day			
Endrin	<input type="checkbox"/>							mg/l	kg/day			
Endrin Aldehyde	<input type="checkbox"/>							mg/l	kg/day			
Heptachlor	<input type="checkbox"/>							mg/l	kg/day			
Heptachlor Epoxide	<input type="checkbox"/>							mg/l	kg/day			
PCB-1242	<input type="checkbox"/>							mg/l	kg/day			
PCB-1254	<input type="checkbox"/>							mg/l	kg/day			
PCB-1221	<input type="checkbox"/>							mg/l	kg/day			
PCB-1232	<input type="checkbox"/>							mg/l	kg/day			
PCB-1248	<input type="checkbox"/>							mg/l	kg/day			
PCB-1260	<input type="checkbox"/>							mg/l	kg/day			
PCB-1016	<input type="checkbox"/>							mg/l	kg/day			
Toxaphene	<input type="checkbox"/>							mg/l	kg/day			
<b>Table 2C-4</b>												
Acrolein	<input type="checkbox"/>							mg/l	kg/day			
Acetaldehyde	<input type="checkbox"/>							mg/l	kg/day			
Acetic acid	<input type="checkbox"/>							mg/l	kg/day			
Acetic anhydride	<input type="checkbox"/>							mg/l	kg/day			
Acetone cyanohydrin	<input type="checkbox"/>							mg/l	kg/day			
Acetyl bromide	<input type="checkbox"/>							mg/l	kg/day			
Acetyl chloride	<input type="checkbox"/>							mg/l	kg/day			



**Willard Mobile Home Park**  
December 16, 2010  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
Chain Link Fence Installed



**Willard Mobile Home Park**  
December 16, 2010  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
Chain Link Fence Installed



**Willard Mobile Home Park**  
January 4, 2011  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
Fernco connection, solids and scum floating on water between the tanks



**Willard Mobile Home Park**  
January 4, 2011  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
No backfill between new tanks



**Willard Mobile Home Park**  
January 4, 2011  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
No backfill between new tanks



**Willard Mobile Home Park**  
January 4, 2011  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
Stockpiled gravel



**Willard Mobile Home Park**  
January 4, 2011  
Photo By: Andrew Gall, Ohio EPA, NWDO-DSW  
Sand filters