



Environmental
Protection Agency

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

March 7, 2011

RE: RUSTIC COVE MOBILE HOME PARK
NPDES PERMIT NO. 3PV00082
GENEVA TOWNSHIP, ASHTABULA CO.
COMPLIANCE EVALUATION INSPECTION

Clarissa and Michael Weiner
Rustic Cove Mobile Home Park
202 East Summit Street
Kent, OH 44240

Dear Mr. and Ms. Weiner:

On March 3, 2011, a site inspection was conducted at the above referenced facility at 3107 South Myers Road, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and no one represented the Rustic Cove Mobile Home Park during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit in conjunction with the renewal of said permit. The last compliance inspection was conducted on February 11, 2010.

The collection system consists of both a gravity system from the mobile home park. The treatment system consists of flow equalization, a trash trap, extended aeration tanks, clarification, lift station, surface sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management of sludge removal from the aeration system and trash trap when needed to another POTW. The facility discharges to an unnamed tributary of Cowles Creek located on the north side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations

Following are observations made during the inspection.

1. The design flow of the extended aeration plant is 20,000 gallons per day. The plant operates continuously.
2. The pumps that serve the flow equalization basin were cycled and found in operable condition. The alarms were tested and found in inoperable condition. The source of the alarm problem must be corrected as soon as possible.
3. The equalization basin was found to be sufficiently aerated. The electrical controls for the aeration system appear to be questionable, with a lot of extension cords and temporary power lines routed to various pieces of equipment.

4. The content of the aeration tank had an earthy odor, medium brown color with good mixing and no foam present. The blowers in operation were cycled and found in operating condition. A number of pumps and blowers were noted as out of service (see attached pictures). These blowers and pumps should be repaired and returned to service as soon as possible. The blowers were running and the plant was receiving fair aeration. The color and odor are typical for the aeration tank in proper condition.
5. The surface of the clarifier was turbid and should be clear (see attached picture). Effluent channels were observed in marginal condition. The skimmer was found in operating condition, and the return activated sludge lines were functioning properly.
6. The sand filter dosing pumps were cycled and found in operating condition. The alarms were found in operating condition. The water discharged to the sand filters during the cycling operation could not be observed due to the sand filters being flooded.
7. The surface sand filters were not in acceptable condition. There were temporary hoses around the filters to and from the filters indicating some process bypassing (see attached pictures). Please provide a rationale as to the purpose of the temporary hoses. The south filter was frozen and the north filter was not frozen and was flooded (see attached pictures). From examination of the sand filters, it appears that the locations of the feed lines for the filters were moved from the center of the bed to along the interior wall. The influent line should discharge to the center of the bed to ensure even application of the wastewater to the bed. Ohio EPA notes that the filters were bypassed at the last inspection. The source of the poor filtration of the sand filters must be investigated, and if necessary the sand filters rebuilt, including new sand and gravel/piping under drains.
8. Vegetation removed from the sand filters was laying in torn garbage bags. Any sludge, leaves, weeds, and other vegetation removed from the sand filters has been in contact with partially treated sewage and is considered by Ohio EPA to be a solid waste, and must be disposed of as a solid waste.
9. The final discharge pipe at the unnamed tributary to Cowles was observed as in acceptable visual quality.
10. The plant is operated by Dustin Lewis of Lewis Wastewater Services on behalf of the Rustic Cove Mobile Home Park. Mr. Lewis collects samples, performs laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system.

NPDES Permit Compliance Review

The Rustic Cove Mobile Home Park operates under NPDES Permit No. 3PV00082*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2010 through February 1, 2011 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Effluent Limit Violations

The following effluent limit violations were noted.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.24	2/1/2010
001	00530	Total Suspended Solids	30D Qty	0.91	1.4383	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.70477	3/1/2010
001	80082	CBOD 5 day	30D Qty	0.76	1.4383	3/1/2010
001	00530	Total Suspended Solids	7D Qty	1.36	1.4383	3/15/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.70477	3/15/2010
001	80082	CBOD 5 day	7D Qty	1.13	1.4383	3/15/2010

Ohio EPA notes that the above referenced February and March 2010 ammonia nitrogen violations placed Rustic Cove MHP in significant noncompliance, and Ohio EPA notified you of this via letter on August 5, 2010. To-date no response has been received. A written explanation as to why these limit violations occurred must be provided along with measures to ensure that they are not repeated. If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Reporting Violations

No reporting frequency or code violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations: Failure to Maintain Engineered Components: From examination of the plant, several blowers and pumps are inoperable. It is unlikely that all these components became inoperable simultaneously. It also appears that the sand filters are not operating and are flooded. The source of the problem with the sand filters must be investigated. These sand filters may require sand replacement and replacement of the under drain system.

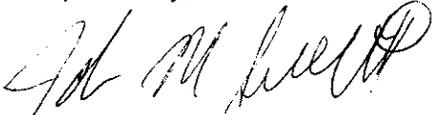
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Based upon the inspection findings and the overall compliance record of the facility, the Rustic Cove Mobile Home Park considered in marginal compliance with the terms and conditions of its NPDES permit. However, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

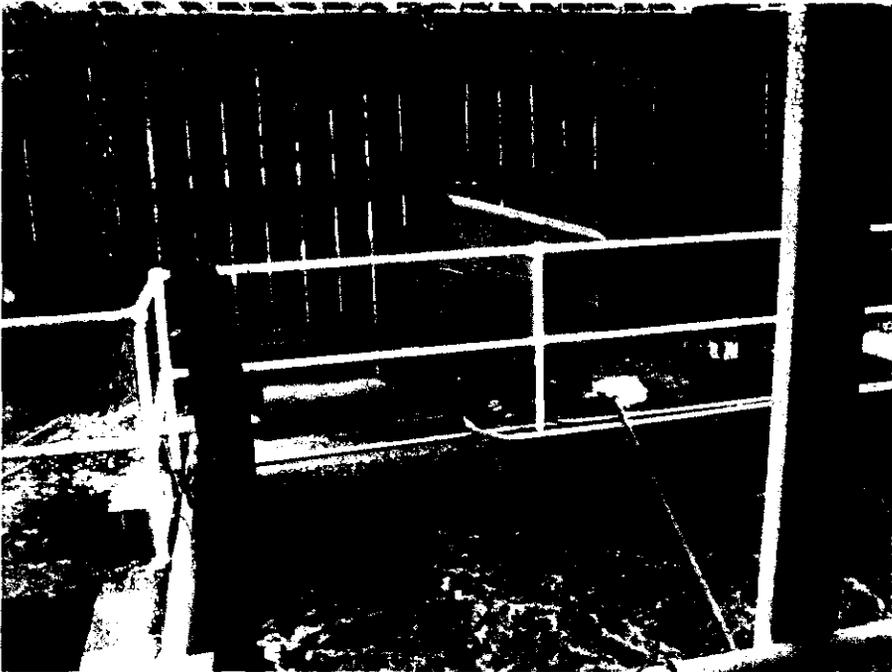
JMS/mt

pc: Dustin Lewis, Lewis Wastewater Management

File: SP/Ashtabula/Geneva Twp./Rustic Cove Mobile Home Park 3PV00082

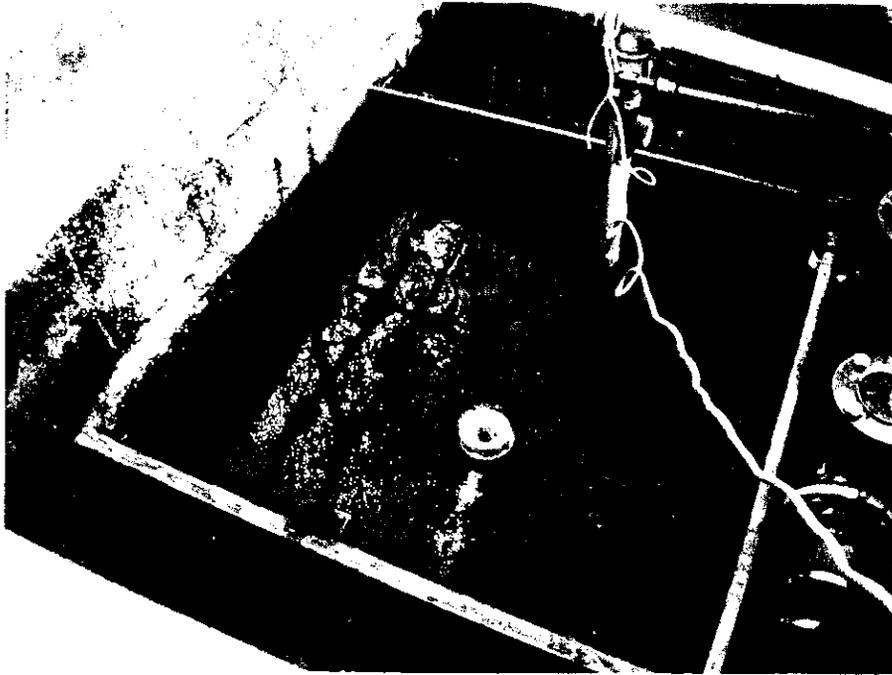


Aeration Blower Disassembled

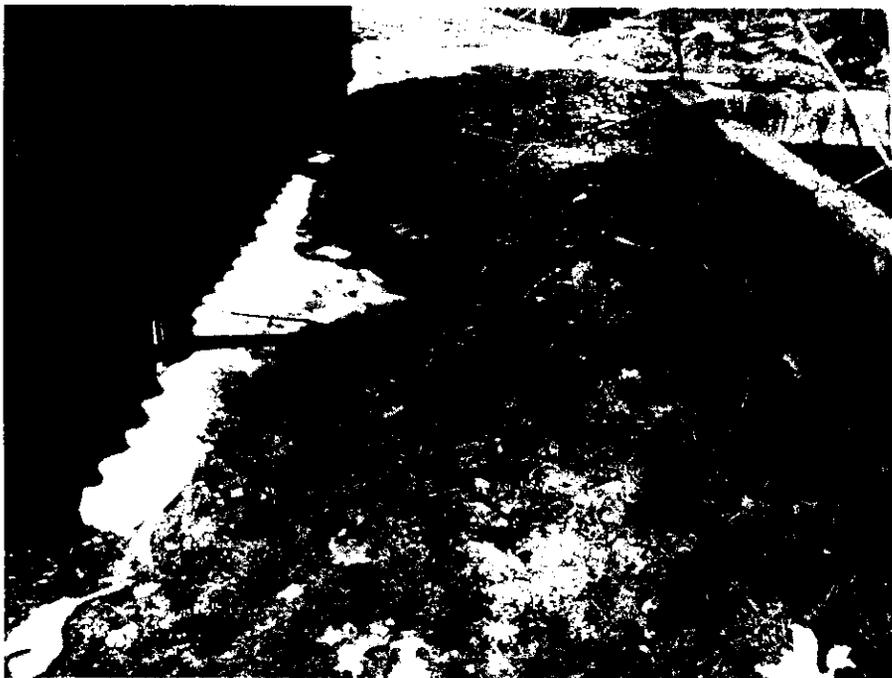


Another Blower Disassembled

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Final Clarifier with Turbid Water being Discharged



Temporary Hoses Suggesting a Bypass of the Sand Filters

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South Sand Filter Frozen and Flooded



North sand Filter Flooded

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Final Discharge at Cowles Creek



Temporary Hose and Bags of Weeds from Filter

**Environmental
Protection Agency**

Ted Strickland, Governor
Les Fisher, Lt. Governor
Cara Koneski, Director

August 5, 2010

RE: RUSTIC COVE MOBILE HOME PARK WWTP
NPDES PERMIT NO. 3PV00082
GENEVA TOWNSHIP, ASHTABULA CO.
SIGNIFICANT NONCOMPLIANCE NOTICE

Clarissa and Michael Wiener
Rustic Cove Mobile Home Park
202 East Summit Street
Kent, OH 44240

Dear Mr. and Mrs. Wiener:

During a review of Ohio EPA's electronic discharge monitoring report (eDMR) information for the above referenced facility at 3107 South Meyers Road, Geneva Township, Ashtabula County, Ohio EPA noted that the facility is in significant noncompliance (SNC) for ammonia-nitrogen. U.S. EPA defines significant noncompliance for ammonia-nitrogen when a facility exceeds the limits established by the facility's National Pollutant Discharge Elimination System (NPDES) permit by more than 40% for two or more months during the consecutive quarter review. The period reviewed is January through June 2010. I have attached a copy of the U.S. EPA criteria for noncompliance for your reference.

Ohio EPA notes that the system consists of a trash trap, flow equalization basin, extended aeration tanks, clarifiers, dosing tank and surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from the sludge tanks to another POTW. The facility discharges to an unnamed tributary to Cowles Creek. No backup power is provided to the facility, but the facility is provided with alarms.

A review of the eDMR information for ammonia-nitrogen indicated the following exceedences:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.24	2/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.11	.70477	3/1/2010
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.17	.70477	3/15/2010

Please inform this office, in writing, within 30 days of the date of this letter as to the actions that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed.

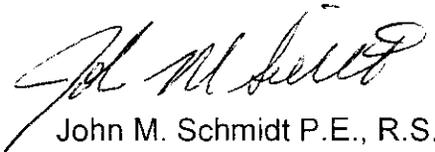
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Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you determine that additional treatment units are necessary in order to achieve compliance, please note that you must submit a permit-to-install (PTI) application, along with the necessary application forms, associated fees, and detailed plans and specifications to this office for review. Additional information on the permit-to-install process may be found at <http://epa.ohio.gov/dsw/pti/index.aspx>. Application forms may be found at <http://epa.ohio.gov/dsw/pti/PTIForms.aspx>.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

enc: U.S. EPA Significant Noncompliance (SNC) Criteria, September 21, 1995 (6pp)

File: Semipublic P/C/Rustic Cove MHP (Geneva Twp., Ashtabula Co.)