



Environmental
Protection Agency

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

May 16, 2011

RE: DUN ROVIN MOBILE HOME PARK
NPDES PERMIT NO. 3PV00043
NORTH KINGSVILLE VILLAGE, ASHTABULA
COMPLIANCE INSPECTION EVALUATION

Mr. B. J. Davies
Shaun and Sara Hessell
Dun Rovin Lodge Co.
4017 Lake Road
North Kingsville, Ohio 44030

Dear Mr. Davies, Mr. Hessell, and Mrs. Hessell:

On May 12, 2011, a site inspection was conducted at the above referenced facility at 4017 Lake Road (State Route 531), North Kingsville Village, Ashtabula County. The inspection was conducted by John Schmidt of this office, and Sara Hessell represented the Dun Rovin Lodge Co., d.b.a. Dun Rovin Mobile Home Park. 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 June 15, 2010.

The collection system consists of both a gravity system and pump station located north of the waste water treatment plant (WWTP). The treatment system consists of a trash trap, flow equalization basin, extended aeration tanks, clarification, surface sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management of sludge removal from the sludge tanks when needed to another POTW. The facility discharges to an unnamed tributary of Lake Erie adjacent to 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 7,000 gallons per day. The plant operates continuously.
2. The pump station north of the wastewater plant was observed, the pumps cycled and found in operating condition, and the alarm tested and found in operating condition.
3. The plant is operated by Roger Osborne of Clean Streams/Lewis Wastewater Management on behalf of Dun Rovin. Clean Streams collects samples, performs

laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system.

4. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.
5. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. The equalization basin and extended aeration plant is maintained under roof. Collected trash was containerized for disposal at a solid waste landfill.
6. The content of the aeration tank had a dark brown color and good mixing. Sludge returns were a dark brown color with minimal foaming. This is an indication of a plant that may have old sludge to be removed. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The surface of the southeast clarifier was clear; however, the surface of the southwest clarifier had a thick layer of sludge (see attached pictures). The skimmer and return lines were in proper operation in the southeast clarifier, but not operating in the southwest clarifier. Effluent channels and weirs were clean.
8. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition. The dosing tank had some vegetation that should be cleaned.
9. Surface sand filters were reasonably clean and operable, although there was evidence of sludge accumulation in the west sand filter (see attached pictures). This should be cleaned as soon as possible. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged. According to Mrs. Hessel, the sand in the sand filters was replaced in 2011
10. The chlorination and dechlorination tanks were stocked with chemicals and operating properly. The post-disinfection aeration system was also operating properly.
11. The final effluent was clear. The final discharge at the unnamed tributary to Lake Erie was observed as clear.
12. Samples are collected by Mr. Osborne. Mr. Osborne performs on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity.

13. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
14. Mr. Osborne submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

NPDES Permit Compliance Review

Dun-Rovin Lodge Co. operates the Dun-Rovin Mobile Home Park wastewater treatment facility under NPDES Permit No. 3PV00043*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2010 through April 1, 2011 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	15.12	12/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	15.12	12/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.0795	.26217	12/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.12	.26217	12/1/2010

Effluent limit violations must be explained, along with measures to ensure that they are not repeated.

Reporting Violations

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

Other NPDES Violations

The following additional NPDES permit violations are noted:

Failure to Submit Annual Sludge Report: Ohio EPA notes that Part II, Item L of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report is required even if no sludge was removed the previous calendar year. Ohio EPA's files reflect that Dun Rovin Lodge Co. has never submitted this report since the NPDES permit was issued in 2005. Please submit the report to Chris Moody of this office as prescribed by your NPDES permit.

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Compliance Schedule

Based upon a review of Ohio EPA's files, the following is a compliance schedule summary as specified by your permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
12/01/2010	11/30/2015	12/01/2011		95999	Other	E Coli Status Report
12/01/2010	11/30/2015	06/01/2012		-----	Other	PTI for E Coli if needed
12/01/2010	11/30/2015	06/01/2012		95999	Other	E Coli Status Report
12/01/2010	11/30/2015	06/01/2012		05699	Other	Achieve Final Limits E Coli

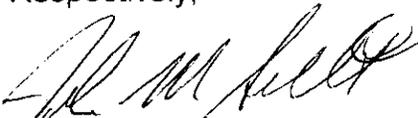
As these milestones have not been reached; no response if needed at this time.

Based upon the inspection findings and the overall compliance record of the facility, Dun Rovin Lodge Co. is considered to be in substantial compliance for its Dun Rovin Mobile Home Park wastewater treatment facility; 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 that 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 notification, please feel free to contact me at (330) 963-1175.

Respectively,

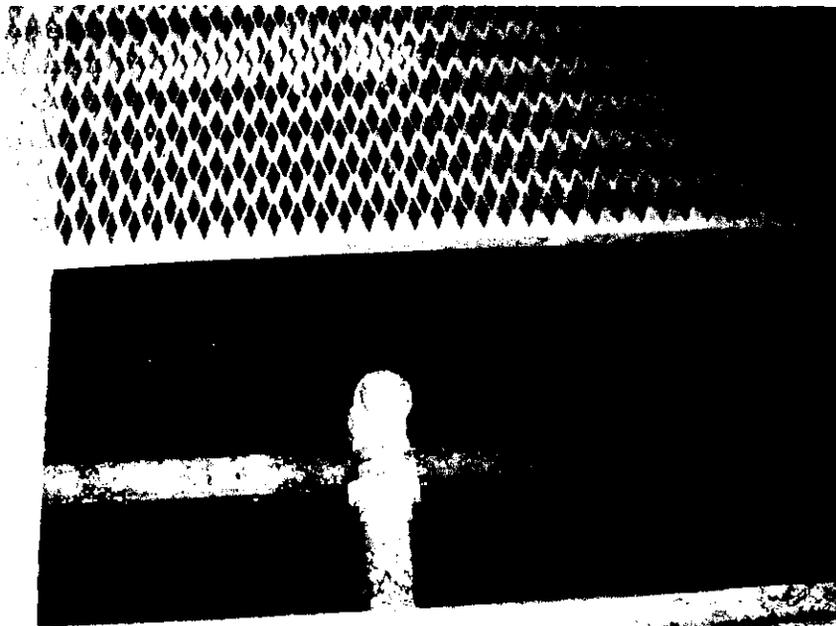


John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

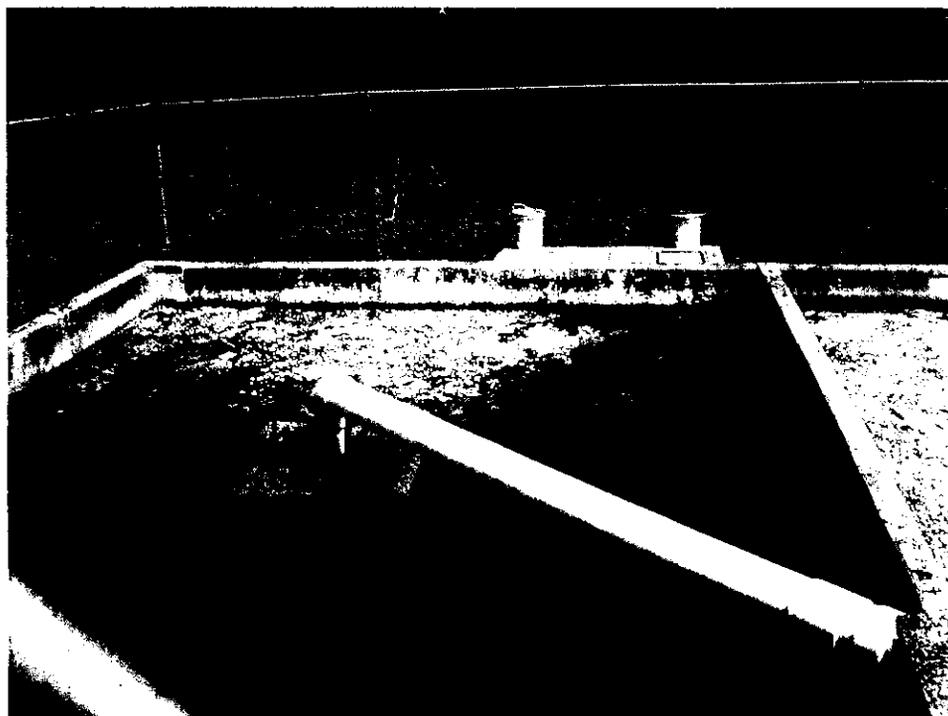
JMS/mt

cc: Dustin Lewis, Lewis Wastewater Management w/encl
Roger Osborne, w/encl

File: SP/Ashtabula/North Kingsville Village/Dun Rovin MHP (3PV00043)



Southeast Clarifier with Accumulated Sludge



West Sand Filter with Sludge