



Environmental
Protection Agency

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

May 25, 2011

RE: WHISPERING WILLOW MHC
NPDES PERMIT NO. 3PV00084
HARPERSFIELD TWP, ASHTABULA CO.
COMPLIANCE INSPECTION EVALUATION

Mr. Steve Ureel, General Partner
4 MHC Associates Limited Partnership
Whispering Willow Mobile Home Community
1120 North Main Street
Rochester, MI 48307

Dear Mr. Ureel:

On May 19, 2011, a site inspection was conducted at the above referenced facility at 4250 State Route 307, Harpersfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and nobody was available during the inspection to represent 4 MHC Associates Limited Partnership (4MHC), d.b.a. Whispering Willow Mobile Home Community. 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 October 15, 2008.

The collection system consists of a gravity system located east and northeast 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, and dechlorination. Sludge management of sludge removal from the sludge tanks when needed to another POTW. The facility discharges to the Grand River adjacent to the southwest 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 plant is operated by Dustin Lewis and Marlene Knopsnider of Clean Streams/Lewis Wastewater Management on behalf of 4 MHC. Clean Streams collects samples, performs laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system.
3. Log books and the operation and maintenance manual could not be located at

the site and were unavailable for inspection.

4. The overall condition of the treatment plant during this inspection was **unsatisfactory**. The plant was bypassing the surface sand filters, disinfection system, and dechlorination system during the inspection and was instead discharging overland to the Grand River (see attached pictures).
5. Collected trash was containerized for disposal at a solid waste landfill.
6. The flow equalization tank was found in **unsatisfactory condition**. The blowers were cycled and found in operating condition, but were turned off and the flow equalization tanks were not receiving any air. The alarms were tested and found in operating condition, but were turned off. If left in the on position, they were indicating a high level.
7. 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.
8. The clarifiers were found in **unsatisfactory condition**. The surface of the clarifier contained floating sludge (see attached pictures). The skimmer and return lines were not in proper operation. The skimmer was not functional. Effluent channels and weirs were not clean or in acceptable condition (see attached pictures).
9. Surface sand filter dosing pumps could not be cycled; therefore their operating condition is unknown. The alarms also could not be tested; therefore their operating condition is also unknown. The dosing tank had some vegetation that should be cleaned.
10. Surface sand filters were found in unacceptable condition (see attached pictures). Both sand filters had a significant accumulation of sludge and piping was in a state of disrepair. The filters should be cleaned as soon as possible and may need to be rebuilt with new filter sand. The source of the plugging should be investigated as soon as possible, and may be more than simply plugged with sludge.
11. The chlorination and dechlorination tanks were neither stocked with chemicals nor operating properly. The chlorine tank needs to have leaves, wood, and other debris removed and properly cleaned.

12. The final effluent was discharging a trickle, and was clear. The final discharge at the Grand River was observed as clear.
13. Samples are collected by Ms. Knopsnider. Mr. Knopsnider performs on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity.
14. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
15. Lewis Wastewater Services / Clean Streams submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

NPDES Permit Compliance Review

4 MHC operates the Whispering Willow Mobile Home Community wastewater treatment facility under NPDES Permit No. 3PV00084*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 through April 1, 2011 indicates the following noncompliance of the terms and conditions of your NPDES permit:

Effluent Limit Violations

No effluent limit violations were noted for the time period reviewed.

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 NPDES Violations

The following additional NPDES permit violations were noted during the inspection:

1. **Failure to Maintain Engineered Components**: Part III, Item 3 of your NPDES permit requires you to maintain your wastewater plant in proper working order. From examination of the plant, several blowers and pumps as well as both sand filters were not operating, and 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.
2. **Failure to Report Unauthorized Discharges**: Part III, Item 11 of your NPDES permit requires you to bypass or divert wastewater from the wastewater

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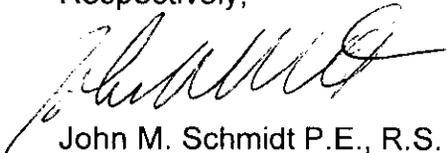
treatment works only if it is unavoidable to prevent loss of life, personal injury, or severe property damage. The discharge is also supposed to be reported as prescribed under Part III, Item 12. Please submit the required notification and the expected duration to this office as prescribed by your NPDES permit.

Based upon the inspection findings and the overall compliance record of the facility, 4 MHC Associates Limited Partnership is considered to be in **substantial noncompliance** with the terms and conditions of its NPDES permit for its Whispering Willow Mobile Home Community wastewater treatment facility. The above items must be addressed.

Please inform this office, in writing, within 14 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 Ohio EPA has not heard from you within 14 days of the date of this letter, this office will be referring this matter for enforcement.

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

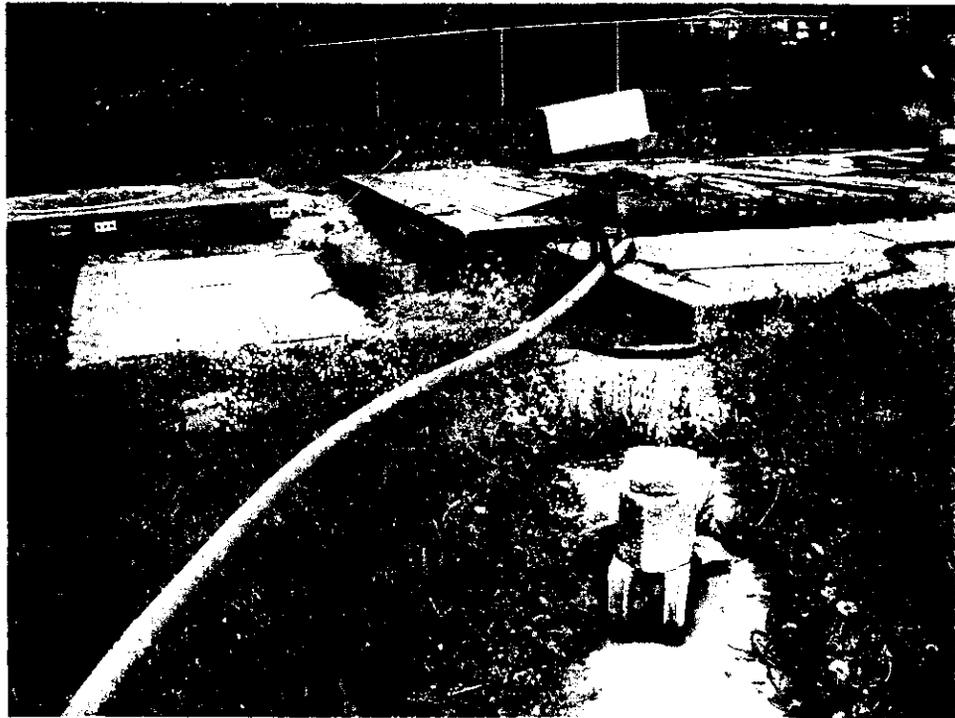
JMS/mt

cc: Dustin Lewis, Lewis Wastewater Management w/encl
Marlene Knopsnider, w/encl

File: SP/Ashtabula/Harpersfield Twp/Whispering Willow MHC (3PV00084)



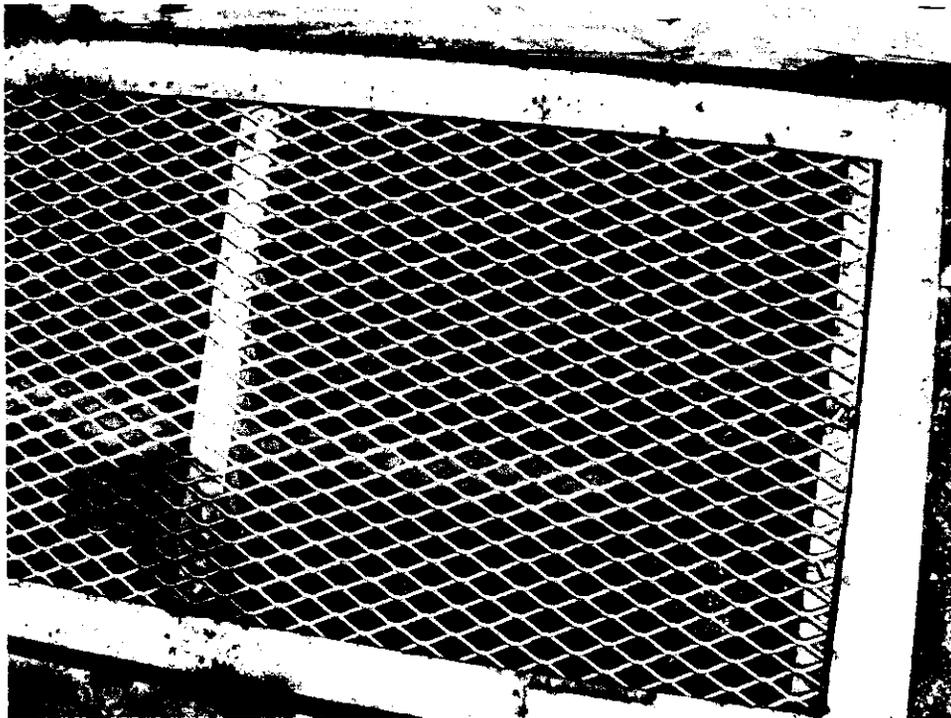
Illegal Discharge from WWTP



Pumping to Direct Discharge from Clarifier



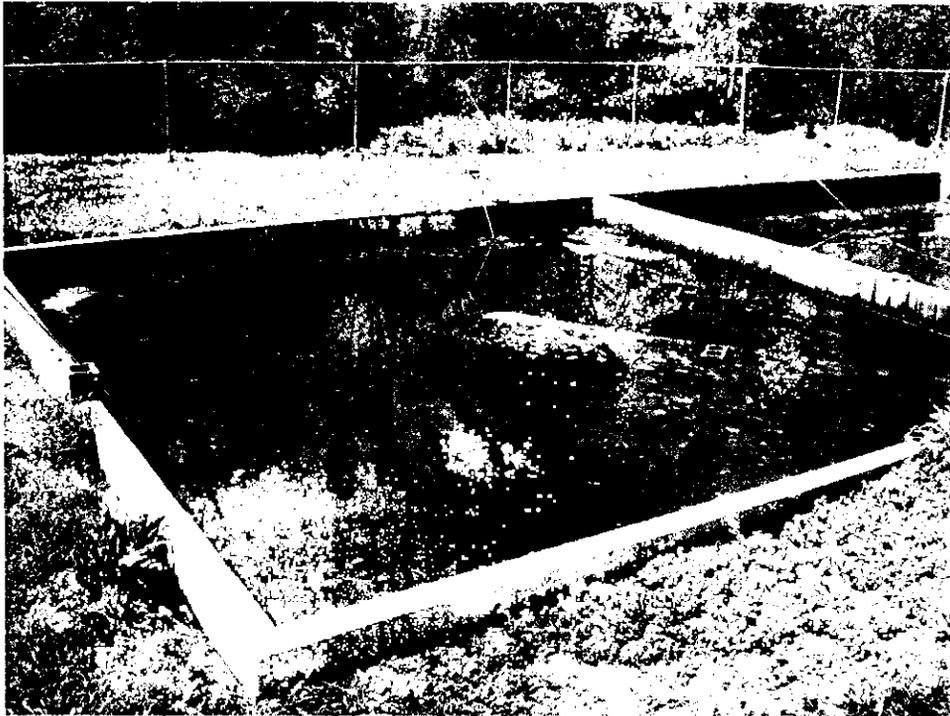
Temporary Piping Installed to Illegal Discharge



Aeration Tank with Return Lines



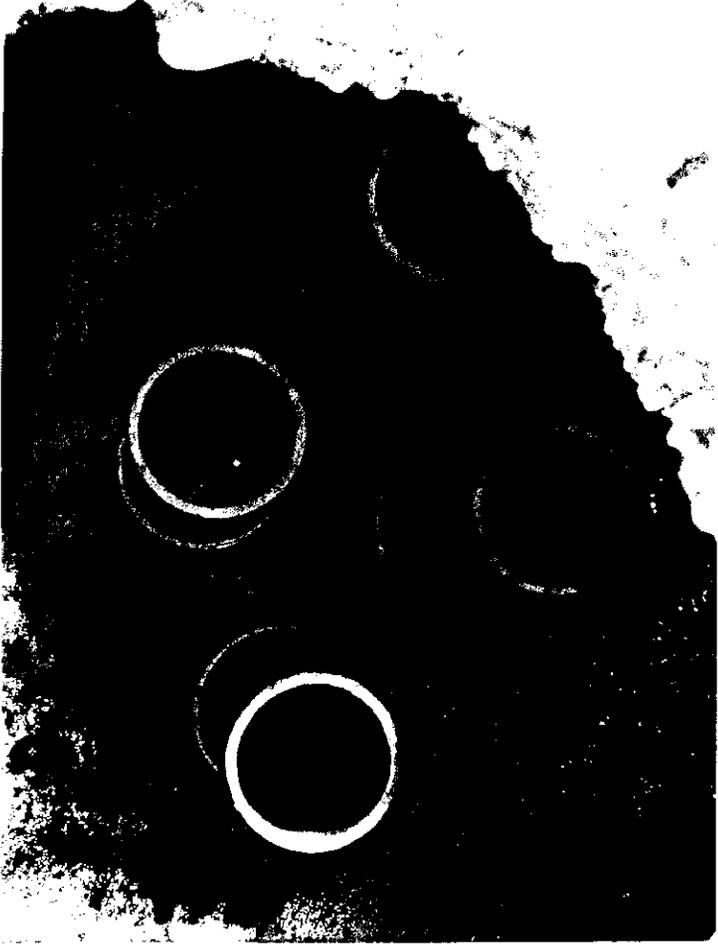
Final Clarifiers with Floating Sludge, Inoperable Skimmer



South Sand Filter full of Sludge and disconnected Piping



North Sand Filter full of Sludge, not functional



Empty Chlorinator in Chlorine Contact Tank



No Discharge to Grad River through Outfall 001