



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

October 19, 2007

RE: CUYAHOGA COUNTY
OLMSTED TOWNSHIP
COLUMBIA PARK
(NPDES NO. 3PV00013)

CERTIFIED MAIL

Ms. Brenda Parker
Columbia Park
7100 Columbia Road
Olmsted Twp., OH 44138

*Joe Flutnyan - operator
419)202-1137 (ext)*

Dear Ms. Parker:

On September 27, 2007, a Compliance Evaluation Inspection (CEI) was conducted at the Columbia Mobile Home Park wastewater treatment plant, 7100 Columbia Road. The purpose of the inspection was to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits, as well as evaluate the treatment plant processes and effluent discharge quality.

At the time of the inspection, the general operation and maintenance of the plant could be rated as marginal. The following observations were made:

- 1) The Cantex and aeration tanks were all in operation. Contents of the tanks were medium brown in color. Suspended solids in the tanks appeared to be somewhat low.
- 2) The underground air lines leading to the above-ground aeration tanks have been replaced with new PVC lines along the side of the aeration tank.
- 3) Both of the rapid sand filters were in operation.
- 4) Solids from the aeration tanks were being wasted onto the two sludge drying beds. The other two filter beds are used for backwash from the rapid sand filters.
- 5) The chlorine contact tanks had a floating mat of scum near the end of the tanks.

According to our files, the last Compliance Evaluation Inspection (CEI) conducted at the Columbia Mobile Home Park WWTP was on December 6, 2005. A review of the Monthly Operating Reports (MOR's) submitted for the WWTP since our last inspection found the following final effluent limit numeric violations (January 1, 2006 through October 1, 2007):

**Columbia Mobile Home Park WWTP
NPDES Permit 3PV00013
Numeric Effluent Violations
(January 1, 2006 through October 1, 2007)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	CBOD 5 day	1D Qty	14.2	18.7266	3/2/2007
February 2007	CBOD 5 day	1D Qty	14.2	14.9280	2/22/2007
July 2006	Chlorine, Total Residual	1D Conc	0.019	.06	7/3/2006
August 2007	Chlorine, Total Residual	1D Conc	0.019	.1	8/23/2007
May 2006	Dissolved Oxygen	1D Conc	5.0	4.8	5/2/2006

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2006	Dissolved Oxygen	1D Conc	5.0	4.5	5/3/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.6	5/4/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.4	5/6/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.6	5/7/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.8	5/10/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.5	5/11/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.1	5/12/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.5	5/14/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.6	5/15/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.2	5/16/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.	5/22/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.2	5/23/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.6	5/24/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.6	5/26/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.1	5/27/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.5	5/28/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.	5/29/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	4.4	5/30/2006
May 2006	Dissolved Oxygen	1D Conc	5.0	3.6	5/31/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	2.6	8/1/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	2.1	8/2/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	4.	8/4/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	2.9	8/5/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	2.1	8/6/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	4.7	8/7/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	4.1	8/8/2006
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August 2006	Dissolved Oxygen	1D Conc	5.0	4.4	8/26/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	3.7	8/27/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	4.5	8/28/2006

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2006	Dissolved Oxygen	1D Conc	5.0	3.	8/29/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	3.6	8/30/2006
August 2006	Dissolved Oxygen	1D Conc	5.0	1.9	8/31/2006
April 2006	Dissolved Oxygen	1D Conc	5.0	4.9	4/21/2006
April 2006	Dissolved Oxygen	1D Conc	5.0	4.7	4/22/2006
April 2006	Dissolved Oxygen	1D Conc	5.0	4.9	4/23/2006
October 2006	Dissolved Oxygen	1D Conc	5.0	3.9	10/1/2006
October 2006	Dissolved Oxygen	1D Conc	5.0	3.5	10/2/2006
October 2006	Dissolved Oxygen	1D Conc	5.0	4.2	10/3/2006
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October 2006	Dissolved Oxygen	1D Conc	5.0	4.9	10/15/2006
October 2006	Dissolved Oxygen	1D Conc	5.0	3.8	10/17/2006
June 2006	Dissolved Oxygen	1D Conc	5.0	3.7	6/1/2006
June 2006	Dissolved Oxygen	1D Conc	5.0	3.5	6/2/2006
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September 2006	Dissolved Oxygen	1D Conc	5.0	4.6	9/4/2006
September 2006	Dissolved Oxygen	1D Conc	5.0	3.9	9/5/2006
September 2006	Dissolved Oxygen	1D Conc	5.0	4.	9/6/2006

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September 2006	Dissolved Oxygen	1D Conc	5.0	4.6	9/10/2006
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September 2006	Dissolved Oxygen	1D Conc	5.0	3.5	9/28/2006
November 2006	Dissolved Oxygen	1D Conc	5.0	4.8	11/29/2006
November 2006	Dissolved Oxygen	1D Conc	5.0	4.2	11/30/2006
July 2006	Dissolved Oxygen	1D Conc	5.0	4.6	7/1/2006
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 Columbia Park
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August 2007	Dissolved Oxygen	1D Conc	5.0	3.4	8/16/2007
August 2007	Dissolved Oxygen	1D Conc	5.0	3.5	8/17/2007
August 2007	Dissolved Oxygen	1D Conc	5.0	3.	8/18/2007

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August 2007	Dissolved Oxygen	1D Conc	5.0	3.6	8/31/2007
October 2006	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	2.5	10/6/2006
June 2006	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	2.4	6/3/2006
June 2006	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	7.9	6/14/2006
June 2006	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	6.5	6/17/2006
June 2006	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	2.7525	6/1/2006
June 2006	Nitrogen, Ammonia (NH3-N)	1D Qty	2.2	2.27251	6/14/2006
July 2006	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	4.3	7/1/2006
July 2006	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	4.9	7/11/2006
July 2006	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	1.81444	7/1/2006
July 2007	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	2.6	7/21/2007
July 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	1.50111	7/1/2007
March 2007	Total Suspended Solids	1D Conc	18	22.4	3/2/2007
March 2007	Total Suspended Solids	1D Conc	18	21.6	3/3/2007
March 2007	Total Suspended Solids	1D Conc	18	20.8	3/8/2007
March 2007	Total Suspended Solids	1D Conc	18	23.4	3/10/2007
March 2007	Total Suspended Solids	1D Conc	18	40.9	3/18/2007
March 2007	Total Suspended Solids	1D Conc	18	28.8	3/24/2007
March 2007	Total Suspended Solids	30D Conc	12	21.4555	3/1/2007
March 2007	Total Suspended Solids	1D Qty	17.0	33.8288	3/2/2007
March 2007	Total Suspended Solids	1D Qty	17.0	18.0680	3/3/2007
March 2007	Total Suspended Solids	1D Qty	17.0	25.9507	3/10/2007
March 2007	Total Suspended Solids	1D Qty	17.0	22.7565	3/18/2007
March 2007	Total Suspended Solids	1D Qty	17.0	23.8727	3/24/2007
March 2007	Total Suspended Solids	30D Qty	11.4	18.2618	3/1/2007
February 2007	Total Suspended Solids	1D Conc	18	19.4	2/18/2007
February 2007	Total Suspended Solids	1D Conc	18	22.	2/22/2007
February 2007	Total Suspended Solids	1D Conc	18	22.	2/26/2007
February 2007	Total Suspended Solids	30D Conc	12	15.25	2/1/2007
February 2007	Total Suspended Solids	1D Qty	17.0	24.1483	2/22/2007
February 2007	Total Suspended Solids	1D Qty	17.0	18.4859	2/26/2007
October 2006	Total Suspended Solids	1D Conc	18	23.	10/4/2006
October 2006	Total Suspended Solids	1D Conc	18	21.4	10/10/2006
October 2006	Total Suspended Solids	1D Conc	18	30.8	10/27/2006

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2006	Total Suspended Solids	30D Conc	12	12.74	10/1/2006
October 2006	Total Suspended Solids	1D Qty	17.0	22.8492	10/27/2006
June 2006	Total Suspended Solids	1D Conc	18	25.2	6/20/2006
June 2006	Total Suspended Solids	1D Conc	18	20.6	6/24/2006
June 2006	Total Suspended Solids	1D Conc	18	23.6	6/27/2006
November 2006	Total Suspended Solids	1D Conc	18	22.2	11/3/2006
July 2006	Total Suspended Solids	1D Conc	18	22.4	7/15/2006
July 2006	Total Suspended Solids	1D Conc	18	21.8	7/23/2006
December 2006	Total Suspended Solids	1D Conc	18	40.6	12/1/2006
December 2006	Total Suspended Solids	1D Conc	18	23.2	12/20/2006
December 2006	Total Suspended Solids	1D Qty	17.0	57.1656	12/1/2006
June 2007	Total Suspended Solids	1D Conc	18	33.2	6/5/2007
September 2007	Total Suspended Solids	1D Conc	18	100.8	9/8/2007
September 2007	Total Suspended Solids	1D Conc	18	52.4	9/12/2007
September 2007	Total Suspended Solids	1D Conc	18	23.2	9/15/2007
September 2007	Total Suspended Solids	1D Conc	18	28.4	9/28/2007
September 2007	Total Suspended Solids	30D Conc	12	28.15	9/1/2007
September 2007	Total Suspended Solids	1D Qty	17.0	45.7833	9/8/2007
September 2007	Total Suspended Solids	1D Qty	17.0	20.6267	9/12/2007
September 2007	Total Suspended Solids	30D Qty	11.4	11.6882	9/1/2007
May 2007	Total Suspended Solids	1D Conc	18	20.6	5/9/2007
August 2007	Total Suspended Solids	1D Conc	18	26.6	8/1/2007
August 2007	Total Suspended Solids	1D Conc	18	23.6	8/28/2007
August 2007	Total Suspended Solids	30D Conc	12	12.6	8/1/2007

Total numeric effluent violations:	Dissolved Oxygen.....	244
	Total Suspended Solids.....	46
	Ammonia Nitrogen.....	11
	CBOD ₅	2
	Chlorine Residual	2

In our February 2006 letter sent to your attention, one of the items discussed was the consistent effluent Dissolved Oxygen (DO) violations being experienced at the WWTP. It was recommended at that time that an auxiliary air line be installed to the chlorine contact tank for purposes of post aeration of the treated effluent. Apparently, the post aeration lines were not installed, or are not being used if they were installed.

The MOR data also reveals an abundance of Total Suspended Solids (TSS) violations over the period. Since the WWTP does include rapid sand filters in its treatment scheme, the occurrence of TSS violations (particularly the quantity reported) is indicative of either an operational, maintenance, or design problem with the process. The purpose of the rapid sand filters is to capture any suspended solids which make it through the treatment process, and to enable the WWTP to consistently meet its limits for TSS.

Ms. Brenda Parker
Columbia Park
October 19, 2007
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The Columbia Mobile Home Park WWTP is in significant noncompliance with its NPDES permit to discharge. This noncompliance has caused the WWTP to be placed on a tracking list for entities which may have escalated enforcement actions taken against them if the violations are not corrected in a timely manner. Corrective actions need to be taken to bring the WWTP back into compliance with its permit as soon as possible.

Please contact this office in writing, within 10 days of the receipt of this letter, indicating what corrective actions will be taken to bring the WWTP back into compliance. If necessary, a meeting can be held between the Park administrators and Ohio EPA to discuss a resolution to this matter.

If you have any questions or comments about this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

File: SP/CuyahogaCounty/OlmstedTwp/Columbia MHP