



State of Ohio Environmental Protection Agency

Northeast District Office

*File:
Semi
Geauga
Claridon
Jacques*

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

June 24, 2008

RE: GEAUGA COUNTY
CLARIDON TOWNSHIP
JACQUES MOBILE HOME PARK
NPDES #3PV00007*ED/OH0044491

CERTIFIED MAIL

Mr. Mark Coleman
Managing Member of General Partnership
990 Beach Avenue, Suite 114
Vancouver, B.C., Canada V6Z 2N9

Dear Mr. Coleman:

I recently conducted a compliance evaluation inspection of the Wastewater Treatment Plant (WWTP) serving Jacques Mobile Home Park, owned by your corporation and operated under NPDES Discharge permit that you signed the application for, #3PV00007*ED. On the plant inspection, I was accompanied by Helen Hayes, representing Geauga County Health Department.

The WWTP operation is unsatisfactory. A review of plant performance records shows that since January 1, 2007, there have been 181 instances when the plant violated permitted limits for the discharge. There have been 26 instances when daily plant performance measurements were not reported. The entire months of September 2007, March 2008, and April 2008 have no performance reports submitted. Sixteen of the seventeen months reported are in violation because of violating permitted limits or failure to report one or more parameters. Most permitted facilities operate successfully with a very small number of permit violations. This office is prepared to refer each of these violations to our legal department for enforcement action. Each of these violations of Ohio Revised Code 6111 can result in fines of up to \$25,000 per day of occurrence.

The plant comprises a trash trap, flow equalization tank, aeration tanks, clarifiers, dosing tank, two slow surface sand filters, and a UV disinfection system. At the time of the physical inspection, the plant was producing a cloudy, visually unacceptable quality effluent.

The clarifiers were covered with solids, and the north sand filter was flooded during the inspection. The south sand filter was covered with wastewater solids and vegetation, including cattails. These sand filters appear to be in need of a thorough inspection of the filter media, careful removal of all vegetation, replacement of missing filter sand, and raking to a level surface. It may be necessary to replace all of the filter media.

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The disinfection process, a UV system, is not functional as installed. It appears to have been installed without a permit-to-install from the Director of Ohio EPA. Last summer, your effluent violated permit limits for E.Coli bacteria eleven times. The installation is not a standard design. The UV bulbs are suspended above the surface of the water which is covered with scum. Ultraviolet light must impinge upon the bacteria in the water to disinfect. A normal installation places the UV bulbs into the flow of clear water to gain proximity to the bacteria.

This office is prepared to refer each of the above-described violations to our legal department for enforcement action. Each of these violations of Ohio Revised Code 6111 can result in fines of up to \$25,000 per day of occurrence

You should hire a professional engineer to evaluate your entire plant to determine causes of the failure to meet permit limits. You may have a defective plant, or poor operation, or other causes for the very high violation count. The many shortcomings at your wastewater treatment plant suggest that your early attention to operation and maintenance and necessary capital improvements is necessary.

Please respond to this letter in writing by July 16, 2008, describing corrective actions and the schedule you intend to accomplish in order to bring your wastewater treatment plant into compliance with your NPDES Permit #3PV00007*ED.

Contact me directly at (330) 963-1260 or at Doug.Hiestand@epa.state.oh.us to discuss any comments or questions you may have regarding this letter.

Sincerely,



Douglas Hiestand
Environmental Engineer
Division of Surface Water

DH/mt

enc: Tables of violations

cc: Richard Vyeno
Steve Howe, Chief of Operations, AKE Laboratory, Inc.
Helen Hayes, Geauga County Health Department

3PV0000120000000

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) ZINA B.</p> <p>C. Date of Delivery July 3</p>
<p>1. Article Addressed to: MARK COLEMAN MANAGING MEMBER OF GENERAL PARTNERSHIP 90 BEACH AVENUE SUITE 114 VANCOUVER BC CANADA V6Z 2N9</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/></p>
<p>2. Article Number 7004 2510 0002 4075 0025 (HIESTAND 6/25/08) (Transfer from service label)</p>	

PS Form 3811, February 2004

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Sent To **MARK COLEMAN**
 Street, Apt. No., or PO Box No. **JACQUES MOBILE HOME PARK**
 City, State, ZIP+4

PS Form 3800, June 2002 See Reverse for Instructions

7004 2510 0002 4075 0025