



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 25, 2009

RE: LAKE COUNTY
KIRTLAND
EAGLE ROAD MOBILE HOME PARK
NPDES PERMIT NO. 3PV00071
APPLICATION NO. OH0103365

NOTICE OF VIOLATION

Ms. Mary Trunzo
5101 Dogwood Trail
Lyndhurst, OH 44124

Dear Ms. Trunzo:

On March 17, 2009, a compliance evaluation inspection of the sewage treatment plant serving Eagle Road Mobile Home Park was conducted by this writer. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

The sewage system is a 25,000 gallon a day extended aeration plant with tertiary treatment and disinfection facilities. The following observations were made at the time of inspection:

- The trash trap was nearly filled to the top level of the tank. The tank contents should be pumped.
- The aeration tank was in operation. The mixed liquor was chocolate brown in color. The return sludge line and skimmer discharge line were in operation.
- The settling tank contents were very turbid. The skimmer was submerged and should be adjusted so that it is at the water level surface. The effluent trough contained sludge and an excessive amount of algae that should be removed. The concrete walls of the tank are crumbling at the top of the tank. Repairs should be made to the tank.
- The northernmost filter beds 1 and 2 were not in use. The southernmost filter bed 4 was ponded with sludge. Filter bed 3 had sludge drying on its surface. All sludge and sludge laden sand must be removed from the surface of the sand filters. Each filter bed must contain 18 inches of Ohio EPA approved filter sand. Approved filter sand consists of clean and washed sand with an effective size between 0.4 and 1.0 mm and a uniformity coefficient not greater than 3.0. The filter sand must be raked with an even distributed across the surface area of the filter bed.



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- The disinfection season is from May 1st through October 31st. During this period chlorine tablets must remain in the chlorinator and sulfite tablets must remain in the dechlorinator. The plant discharge must be analyzed for chlorine residual every day during this time period.

A review of the Discharge Monitoring Reports for Outfall 001, covering the period of March 2008 through February 2009 revealed the following violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	7.98	3/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	5.18	3/1/2008
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.28	.4391	3/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.42	.49329	3/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	11.9	3/8/2008
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.42	.82696	3/8/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	6.3	3/15/2008
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.42	.43613	3/15/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	8.54	3/22/2008
001	00400	pH	1D Conc	9.0	9.1	4/24/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	8/21/2008

The following frequency violations were revealed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	08/29/2008

Also, a review of the Discharge Monitoring Reports for Outfall 001, covering the period of May 2008 through June 2008 revealed invalid use of the e-DMR Data Substitution Codes (A Codes). The AH Code was used on the following dates:

5/2/08	5/5/08	5/6/08	5/7/08	5/9/08	5/12/08
5/13/08	5/14/08	5/16/08	5/19/08	5/20/08	5/21/08
5/23/08	5/26/08	5/27/08	5/28/08	5/29/08	5/30/08
6/9/08					

The AH Code is not to be habitually used for failure to analyze for a pollutant parameter. This code is for the infrequent times that an operator is unable to collect and analyze the effluent for a pollutant parameter. An explanation must be included in the Specific Comment section stating why the sample was not taken.

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

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Pursuant to Ohio Administrative Code 3745-7-09, effective December 21, 2006, this Agency requires the owner and operator of record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. The records shall be housed on site and shall be accessible for twenty-four hour inspection. The following information must be recorded:

1. Identification of the sewage treatment works;
2. Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
3. Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced;
4. Results of tests performed and samples taken, unless documented on a laboratory sheet;
5. Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced; and
6. Identification of the persons making entries.

Please review the administrative code carefully for information on all requirements. Eagle Road Mobile Home Park must immediately make provisions for onsite operation and maintenance records.

The NPDES permit expires October 31, 2009. Pursuant to Ohio Administrative Code 3745-33-03, a renewal application is due 180 days prior to the expiration date of the existing permit. Please submit to this office, Forms 1, 2E and 2S of the NPDES permit application by April 30, 2009. These forms may be obtained at the Ohio EPA Web site: www.epa.state.oh.us/dsw/permits.

Within 10 days of the date of this letter, you are directed to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/mt