



**Environmental  
Protection Agency**

Tim Walcott, Governor  
Les Fischer, Lt. Governor  
Chris Korleski, Director

May 5, 2010

RE: LAKE COUNTY  
KIRTLAND  
EAGLE 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 April 28, 2010, a compliance evaluation inspection of the sewage treatment plant serving Eagle 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 aeration tank was in operation. The mixed liquor was brown in color. The return sludge line and skimmer discharge line were in operation.
- An excessive amount of sludge covered the surface of the settling tank. The sludge return rate should be adjusted. Grass and leaves blocked the skimmer and should be removed. The effluent trough teeth were blocked with sludge and 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 northern two filter beds were not in use. The southern two filter beds were ponded with sludge, vegetation and algae. All sludge, vegetation, algae 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.
- The disinfection season is from May<sup>1<sup>st</sup></sup> through October 31<sup>st</sup>. 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.

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A review of the Discharge Monitoring Reports for Outfall 001, covering the period of March 2009 through March 2010 revealed the following violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Qty	1.7	1.85314	6/15/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.09	.16215	6/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.14	.3243	6/15/2009

Also, a review of the Discharge Monitoring Reports for Outfall 001 revealed the invalid use of the e-DMR Data Substitution Codes (A Codes). The AH Code was consistently used, in error, for the chlorine residual parameter. Your NPDES requires daily monitoring and reporting for the chlorine residual. A review of the DMRs shows that chlorine was reported roughly once per week. This is a violation of your NPDES permit.

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.

This writer located operation and maintenance records for the wastewater treatment plant. However, there was only one entry in the log book, dated March 20, 2010. Pursuant to Ohio Administrative Code 3745-7-09, 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 whenever work is performed at the plant. The records shall be housed onsite and shall be accessible for twenty-four hour inspection. The following information must be recorded:

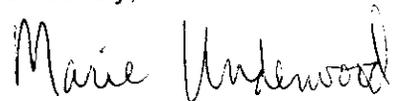
1. Identification of the sewage treatment works;
2. Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
3. Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed 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.

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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,

A handwritten signature in cursive script that reads "Marie Underwood".

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

MU/mt