



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

June 19, 2009

RE: LAKE COUNTY  
KIRTLAND  
KIRTLAND MOBILE HOME PARK  
NPDES PERMIT NO. 3PV00074  
APPLICATION NO. OH0111953

Mr. Victor Ayres  
Kirtland Mobile Home Park  
9735 Chillicothe Road  
Kirtland, OH 44094

Dear Mr. Ayres:

On June 17, 2009, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves the mobile home park. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits.

At the time of inspection, the plant was producing an effluent of satisfactory visual quality in that there was no evidence of suspended solids, floating debris or oil and grease. The following observations were noted:

- The aeration tank mixed liquor was brown in color indicating a balanced system.
- The settling tank was operating satisfactorily.
- The filter bed contained some sludge and plant debris on its surface. Any vegetation, debris, sludge or solids laden sand must be removed from the surface of the beds. Assurance must be made that 18 inches of Ohio EPA approved filter sand exists on the beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective sized of 0.4 mm - 1.0 mm. The filter sand of both beds must be raked and evenly distributed across the surface of the filter bed.
- The chlorinator and dechlorinator contained the required chlorine tablets and sulfite tablets, respectively.
- The sludge holding tank was in operation.

A review of the plant's Discharge Monitoring Reports revealed the following effluent limitation violations during the period of May 2008 to June 2009:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	4.1	8/11/2008
001	00530	Total Suspended Solids	30D Conc	12	17.	9/1/2008

Your NPDES permit requires daily monitoring of the effluent for Water Temperature, Color, Odor, Turbidity and Flow. During the inspection, you stated that the only parameters you monitor each day are Temperature and Flow. Your operator, AKE Labs monitors the remaining parameters but does not come to the plant on a daily basis. Yet on the Discharge Monitoring Reports, data is provided each day for the above referenced parameters. Reporting data that is not actually observed/real-time recorded/analyzed is a violation of your NPDES permit. Someone must be responsible for monitoring each of the parameters that requires daily monitoring.



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Also, bench sheets and a copy of your NPDES permit must remain onsite. Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code Chapter 6111.

The Operation and Maintenance Log Book contained the bulk of the information required by Ohio Revised Code 3745-7-09. However, the arrival and departure times were not recorded. The required information for the log book is as follows:

1. The 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 the administrative code.
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.

The administrative code must be carefully reviewed for information on all requirements.

Enclosed with this letter is an Operator-of-Record Notification form required by our Central Office. The form requires both the signature of the facility owner and the signature of the operator-of-record. Please complete the form and submit it to the address on the form.

Please inform this office, in writing, within ten (10) days of the date of this letter, as to the reasons for the above referenced violations and deficiencies, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

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

Sincerely,



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

MU/mt

Enclosure: Operator-of-Record Notification Form