



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 17, 2009

RE: LAKE COUNTY
PAINESVILLE TOWNSHIP
SPRING LAKE MOBILE HOME PARK
NPDES PERMIT NO. 3PV00120
APPLICATION NUMBER OH0134694

Ms. Helen Bales
Spring Lake Mobile Home Park
11 Huntington Road
Painesville, OH 44077

Dear Mrs. Bales:

On June 10, 2009, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves the above referenced facility. 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.

Wastewater Treatment Plant Observations

At the time of inspection all treatment units were in operation. The following observations were noted:

- The content of the flow equalization tank was being aerated, as required.
- The aeration tank wastewater was chocolate brown in color. Activated sludge was not being returned to the aeration tank. The return sludge was clear.
- An excessive amount of sludge was on the surface of the settling tank. Sludge was also blocking the effluent weir. Consideration should be given to adjusting the sludge return rate or the sludge wasting rate. Sludge accumulation should be gently scraped towards the hopper bottom so that the sludge return pump can pick it up properly.
- One of the two filter beds was covered with dry sludge on its surface. The other filter bed was ponded with sludge. When the filter bed drains and the sludge on the beds dries, the sludge and the sludge laden sand must be removed from the surfaces of the beds and replaced with clean sand. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on both beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed.
- The chlorine contact chamber chlorinator was disassembled and lying on its side. A partial chlorine tablet was visible in the tablet holder. The dechlorinator was also disassembled. Sulfite tablets were not visible. The chlorinator and dechlorinator must be properly assembled. Disinfection of the plant effluent is required from May 1st to October 31st. During this period, chlorine tablets and sulfite tablets must remain in the chlorinator and dechlorinator, respectively.
- The chlorine contact chamber contained sludge. Sludge in the chlorine contact chamber can contribute to ammonia nitrogen effluent limitation violations. The sludge must be immediately removed from this unit.
- The contents of the sludge holding tank were being aerated, as required.



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The above referenced deficiencies must be corrected immediately.

NPDES Permit/Administrative Code Violations

A review of the Discharge Monitoring Reports (DMRs) from the period covering May 2008 to May 2009 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.92	6/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.92	6/1/2008
001	00530	Total Suspended Solids	30D Conc	12	21.	8/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	22.82	8/1/2008
001	00530	Total Suspended Solids	7D Conc	18	21.	8/15/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	22.82	8/15/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	23.52	3/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	23.52	3/15/2009

On the discharge monitoring reports, the average daily design flow continues to be reported for the estimated daily flow. This is not acceptable. Acceptable methods for calculating the estimated flow at the plant are, in order of preference: 1) elapsed time meters on sand filter dosing pumps; 2) elapsed time meters on influent pumps; or 3) water use records.

Your NPDES permit will expire on July 31, 2009. Pursuant to Ohio Administrative Code 3745, a renewal NPDES permit application is to be submitted to this agency 180 days prior to the expiration date of the existing permit. This office has no record of receipt of a renewal application. You are currently in violation of the administrative code. Please immediately submit to this office, the enclosed NPDES permit application, Antidegradation Addendum and the required \$200 application fee.

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.

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. Please inform this office of the proposed location for the operation and maintenance records. The following information must be recorded and kept on site:

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;

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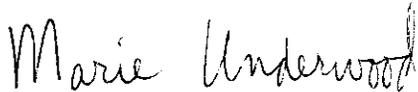
5. Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced; and
6. Identification of the persons making entries.

Actions to be Taken by Permittee

Within 10 days of the date of this letter, you are required 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

Enclosure: NPDES permit application
Antidegradation Addendum