



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
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October 20, 2008

RE: LORAIN COUNTY
AMHERST TOWNSHIP
WESTWOOD MOBILE HOMES WWTP
(NPDES PERMIT NO. 3PV00026)

Ms. Mary Cipolla
Westwood MHP
7055 Quarry Rd.
Amherst, OH 44001

Dear Ms. Cipolla:

On September 23, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the Westwood Mobile Home Park Wastewater Treatment Plant (WWTP). Present during the inspection were Mr. John Keck, representing Westwood; Mr. John Sabo, of the Lorain County Health Department; and this writer of Ohio EPA.

The purpose of the inspection was to evaluate the operation and maintenance of the WWTP, and to discuss the facility's compliance with NPDES Permit effluent limits, terms and conditions.

Evaluated during the inspection were the treatment plant processes, effluent discharge quality, and general compliance with the intent of the permit. The last CEI conducted at the Westwood MHP WWTP was on May 9, 2007.

At the time of the inspection, all of the sewage treatment components at the WWTP were in operation and were operating satisfactorily (with the exception of the rapid sand filters, which have not been in operation for years).

The following observations were made during the September 23rd inspection:

- 1) Influent flows through a comminutor and into a sump crock. From the sump crock the flow is pumped into the headworks of the WWTP via two submersible pumps.
- 2) Grit in the wastewater is then removed by an automatically cleaned mechanical bar screen.
- 3) Grit and screenings from the bar screen are compacted and dewatered, collected, and then disposed of at the BFI landfill (Approximately 65-70 lbs/week).
- 4) The WWTP is divided into two separate WWTPs, the 'Old' plant and the 'New' plant. Approximately 60% of the flow is sent to the 'New' WWTP, and 40% is sent to the 'Old' WWTP.
- 5) Contents of all aeration tanks were medium brown in color, with no foam on the water surface. Ferric chloride is added to the aeration tanks to aid in solids settling and phosphorous control.
- 6) The return activated sludge (RAS) lines from the settling tanks to the aeration tanks were operating, and were a medium brown in color.

- 7) Settling tanks were somewhat clear, with a slight floating grease. Effluent troughs were clear of solids. The skimmer in the 'new' plant is operated manually, once per day. The skimmer in the 'old' plant is operated continuously.
- 8) Rapid sand filters were taken out of service several years ago. Filter media in the sand filters was missing.
- 9) Effluent is being chlorinated by dosing pump, from a chlorine solution contained in a 55 gallon plastic drum.
- 10) Sodium bisulfite (38% - 40% solution) is utilized for dechlorination of the treated effluent.
- 11) Effluent is post aerated prior to discharge. Effluent enters a storm sewer, which eventually discharges to Beaver Creek.
- 12) Sludge wasted from the WWTP is stored in a 25,000 gallon aerated sludge holding tank. When needed, sludge is hauled by Ray Johnson Septic to the City of North Ridgeville French Creek WWTP for treatment and disposal.
- 13) All conventional NPDES Permit effluent parameters are tested in the lab on site, with the exception of Fecal Coliform, which is analyzed by the City of Lorain WWTP laboratory.
- 14) The WWTP has an automatic standby on-site generator for emergency power at the plant, if needed in a power outage.

A review of the electronic Discharge Monitoring Reports (eDMR) submitted for the WWTP since our last inspection (May 1, 2007 through September 1, 2008) found the following final effluent limit numeric violations:

**Westwood MHP
 NPDES Permit No. 3PV00026
 Effluent Limit Numerical Violations
 (May 1, 2007 through Sept. 1, 2008)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2007	Total Suspended Solids	30D Qty	4.1	6.94945	8/1/2007
August 2007	Total Suspended Solids	7D Conc	18	22.8	8/15/2007
August 2007	Total Suspended Solids	7D Qty	6.3	24.2497	8/15/2007
August 2007	CBOD 5 day	7D Qty	5.2	5.31793	8/15/2007
March 2008	Total Suspended Solids	30D Conc	12	27.9166	3/1/2008
March 2008	Total Suspended Solids	7D Conc	18	103.4	3/1/2008
March 2008	Total Suspended Solids	30D Qty	4.1	12.4194	3/1/2008
March 2008	Total Suspended Solids	7D Qty	6.3	56.3571	3/1/2008
March 2008	CBOD 5 day	30D Conc	10	20.46	3/1/2008
March 2008	CBOD 5 day	7D Conc	15	60.6	3/1/2008
March 2008	CBOD 5 day	30D Qty	3.4	8.91799	3/1/2008
March 2008	CBOD 5 day	7D Qty	5.2	33.0294	3/1/2008
March 2008	CBOD 5 day	7D Conc	15	15.6	3/15/2008

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A review of the eDMRs for the same period also found the following effluent monitoring frequency violations:

**Monitoring Frequency Violations
(May 1, 2007 through Sept. 1, 2008)**

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
May 2007	5/20/2007	001	Chlorine, Total Residual	1/Day	1	0
May 2008	5/1/2008	001	Nitrogen, Ammonia (NH3-N)	1/2Weeks	1	0

As a reminder, the currently effective NPDES Permit to discharge (3PV00026*FD) for Westwood Mobile Homes will expire May 31, 2010. Please be reminded that the application for renewal for the new NPDES Permit will need to be submitted to Ohio EPA no later than 6 months before the expiration date (by December 31, 2009).

If you have any questions or comments about this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

File: SP/LorainCounty/AmherstTwp/Westwood MHP