



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

October 8, 2009

RE: MAHONING COUNTY
SMITH TOWNSHIP
TECUMSEH MHP
NPDES PERMIT NO 3PV00023

NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Joseph Raineri, Owner
Tecumseh Village Mobile Home Park
1005 Lake Park Blvd., Lot 96
Sebring, OH 44672

Dear Mr. Raineri:

On September 30, 2009, this writer inspected the wastewater treatment system for the Tecumseh Village Mobile Home Park. Representing the Tecumseh MHP during the inspection was Dwayne Stull. The condition of the treatment system remains unsatisfactory. Following are observations made during the inspection. Pictures of the plant taken during the inspection are included on page 5 of this report.

Aeration Tank:

- The aeration tank appeared to have good color and good mixing.
- Only the north blower was operational at the time of the inspection despite previous commitments from you to place a second blower into service. The south blower has been out of service for several years. A second blower, equal to the size and capacity of the original blower, must be placed into service no later than November 15, 2009. By failing to replace the south blower, Tecumseh MHP is in violations of Part III, Item 3 of the NPDES Permit for failing to maintain the treatment system.

Clarifier:

- The clarifier had approximately ½ inch of sludge and scum floating on the surface. Because the sludge was evenly dispersed across the surface of the clarifier, the most probable cause was that the west sludge return was not operating at the time of the inspection. When the return is plugged, sludge fills the hopper and floats to the surface. The return must be unplugged so that sludge can be recycled to the head of the plant. The sides of the hoppers must

be scrapped to eliminate any cavitations of the sludge on the hopper sides, and the plant needs to be checked to determine if sludge needs to be removed and hauled in accordance with the NPDES Permit. By failing to maintain the sludge return line, Tecumseh MHP is in violations of Part III, Item 3 of the NPDES Permit for failing to maintain the treatment system.

- Sludge was identified behind the effluent baffle and overflowing the effluent weir into the trough. The sludge must be removed from behind the baffle to prevent the plant from discharging high solids. Because Tecumseh has failed to maintain the tertiary treatment system, it is assumed that the sludge identified overflowing the effluent weir was being discharged to the receiving pond.
- A heavy sludge accumulation was identified in the effluent trough. The trough must be cleaned by removing the sludge. The sludge can either be properly disposal as a solid waste or returned to the aeration tank. Sludge shall not be permitted to discharge from the treatment system during cleaning.

Tertiary Building:

- This writer was able to move the access door to the tertiary building in order to inspect the tertiary facilities. The building and facilities remain in a state of disrepair. The system appears to be completely incapable of functioning as a tertiary system. Failure to maintain the tertiary treatment system places Tecumseh MHP in violations of Part III, Item 3 of the NPDES Permit.

Disinfection:

- There is no disinfection system prior to discharge. The system must be modified to install tablet holders for chlorination and de-chlorination tablets. Fecal Coliform violations were identified during the compliance review and are reported below. In addition, with no disinfection system, the wastewater being discharged contains all pathogens associated with human waste.

Be advised noncompliance with the NPDES Permit is considered a violation of Ohio Revised Code 6111.07 subject to appropriate enforcement action.

Effluent:

- The final effluent from the clarifier was cloudy as a result of the sludge overflowing the weir. The effluent was visually unsatisfactory at the time of the inspection.

Permit Compliance Schedule

Be advised that the NPDES Permit for the Tecumseh Village wastewater treatment plant contains a schedule for plant upgrades to meet the final limits. Based on analytical results submitted by Tecumseh, it appears that the treatment system is incapable of consistent compliance with the final limits. Failure to make the necessary improvements to the system in accordance with the NPDES Permit places Tecumseh MHP in Significant Noncompliance with the NPDES Permit and Ohio Revised Code 6111.07.

Compliance Review

The Tecumseh MHP is currently regulated by interim limits. However, the final limits become effective at the end of February 2010. A comparison of the final limits and the analytical results for the past 12 months are shown below.

Parameter	Units	Date	Conc.	Limit
Nitrogen, Ammonia	mg/l	9/10/2008	0.1	1.5
Nitrogen, Ammonia	mg/l	10/1/2008	0.24	1.5
Nitrogen, Ammonia	mg/l	11/5/2008	0.8	4.5
Nitrogen, Ammonia	mg/l	12/10/2008	18.5	4.5
Nitrogen, Ammonia	mg/l	1/7/2009	18.5	4.5
Nitrogen, Ammonia	mg/l	2/11/2009	19.5	4.5
Nitrogen, Ammonia	mg/l	3/4/2009	15.2	4.5
Nitrogen, Ammonia	mg/l	4/1/2009	0.2	4.5
Nitrogen, Ammonia	mg/l	5/6/2009	0.43	1.5
Nitrogen, Ammonia	mg/l	6/3/2009	0.71	1.5
Nitrogen, Ammonia	mg/l	7/1/2009	21.25	1.5
Nitrogen, Ammonia	mg/l	8/12/2009	0.55	1.5
Total Suspended Solids	mg/l	9/10/2008	5	12
Total Suspended Solids	mg/l	10/1/2008	2	12
Total Suspended Solids	mg/l	11/5/2008	9	12
Total Suspended Solids	mg/l	12/10/2008	20	12
Total Suspended Solids	mg/l	1/7/2009	50	12
Total Suspended Solids	mg/l	2/11/2009	14	12
Total Suspended Solids	mg/l	3/4/2009	10	12
Total Suspended Solids	mg/l	4/1/2009	1	12
Total Suspended Solids	mg/l	5/6/2009	4	12
Total Suspended Solids	mg/l	6/3/2009	13	12
Total Suspended Solids	mg/l	7/1/2009	21	12
Total Suspended Solids	mg/l	8/12/2009	1	12
Fecal Coliform	#/100 ml	9/10/2008	7000	1000

Mr. Joseph Raineri
Tecumseh Village Mobile Home Park
October 8, 2009
Page 4

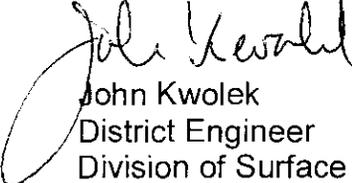
Parameter	Units	Date	Conc.	Limit
Fecal Coliform	#/100 ml	10/1/2008	44100	1000
Fecal Coliform	#/100 ml	5/13/2009	15050	1000
Fecal Coliform	#/100 ml	6/3/2009	13300	1000
Fecal Coliform	#/100 ml	7/1/2009	48400	1000
Fecal Coliform	#/100 ml	8/12/2009	5000	1000

A review of the monitoring data compared to the NPDES Permit limits shows that the Tecumseh MHP will not be capable of consistent compliance with the permit once the limits become final. The plant will require upgrades in order to provide consistent compliance.

Because of the failure of the Tecumseh MHP to upgrade the plant in accordance with the compliance schedule in Part 1.C of the NPDES Permit, and because of the failure maintain the wastewater treatment plant in accordance with Part III.3 of the permit, this writer will be initiating enforcement action against the mobile home park.

You may contact this writer at (330) 963-1251 to discuss any questions you may have.

Respectfully,


John Kwolek
District Engineer
Division of Surface Water

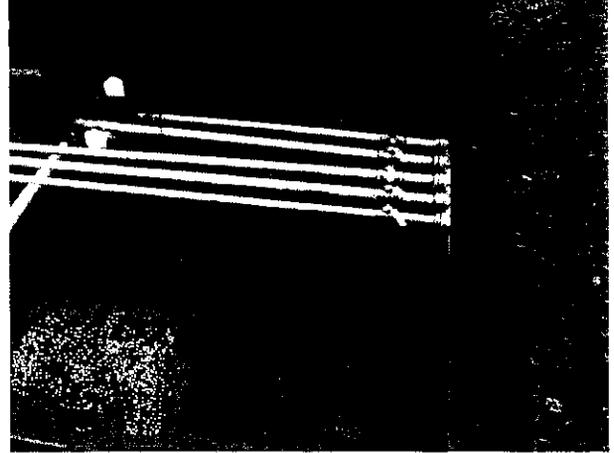
JK/mt

cc: Joe Mansky, Mahoning County Department of Health
John Hallas, Mahoning County Department of Health
Dwayne Stull, Contract Operator
Mr. Joseph Raineri, Callahan Heating and Cooling (Certified Mail)

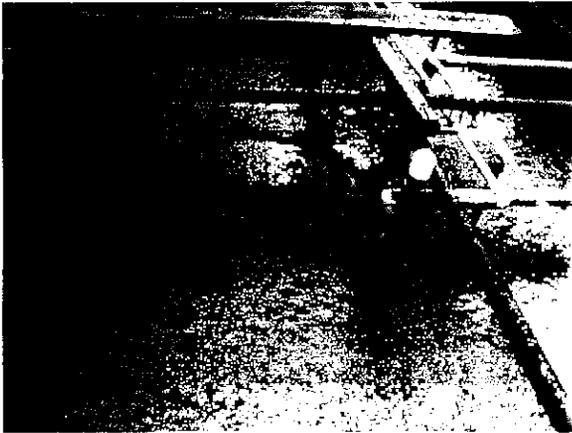
Photos of September 30, 2009 Inspection



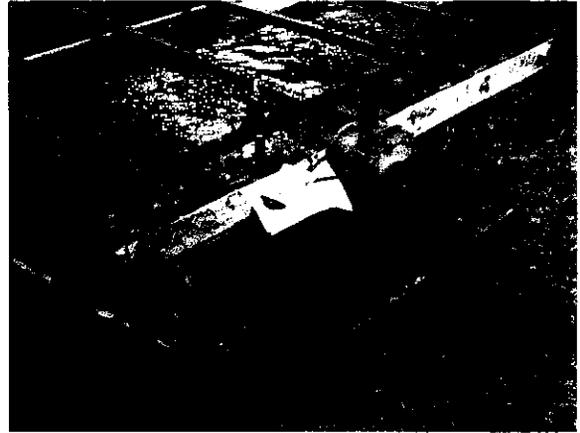
Picture 1. West sludge return not active during 9/30/09 inspection.



Picture 2. Effluent trough during the 9/30/09 inspection.



Picture 3. Sludge on surface of clarifier during the 9/30/09 inspection.



Picture 4. South blower inoperable during the 9/30/09 inspection.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. JOSEPH RAINERI
 CALLAHAN HEATING & COOLING
 5914 RIDGE RD.
 PARMA, OH 45213

COMPLETE THIS SECTION ON DELIVERY

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 Addressee
X

B. Received by (Printed Name) C. Date of Delivery

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 If YES, enter delivery address below: No

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<p>Sent To: <i>Joseph Raineri Collection</i></p> <p>Street, Apt. No., or PO Box No. <i>Callahan Heating & Cooling 5914</i></p> <p>City, State, ZIP+4 <i>Parma OH 45213</i></p>											
PS Form 3800, August 2006 See Reverse for Instructions											