

**Environmental  
Protection Agency**

Gen. Jacobson, Governor  
Les. Fisher, Lt. Governor  
Carm. Lonestk., Director

November 5, 2010

RE: MODERN MANAGEMENT SOLUTIONS  
DBA ALL SEASONS MHP  
PERMIT NO. 3PV00047  
PORTAGE COUNTY  
DEERFIELD TOWNSHIP

Ms. Carol Wise  
Modern Management Solutions  
263 West Main Street  
Ravenna, Ohio 44266

Dear Ms. Wise:

On October 6, 2010, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Eugene Davis, Class III Operator and Mr. Don Roberts, Class IV Operator. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted:

1. Mr. Eugene Davis from efdavis & ASSOCIATES is currently in charge of the technical operations of the wastewater treatment plant and is also responsible for collecting the samples and reporting the results to Ohio EPA's Surface Water Information Management System.
2. Mr. Eugene Davis holds a Class III Wastewater Operators License.
3. Mr. Davis took over operation of the wastewater treatment plant in August 2009.
4. The plant design of the wastewater treatment system is 55,000 gpd.
5. The blowers were running and the plant was receiving good aeration.
6. The contents of the aeration tank were medium brown in color and no foam was present. This is typical of a properly operating plant.
7. The sludge holding tank was also being aerated.
8. The mobile home park is currently only half occupied.
9. Mr. Davis indicated that the plant is currently treating 9,000 to 12,000 gallons per day.
10. Due to the reduced flow only half of the treatment system is being operated.
11. The trash trap was pumped this past July/August.
12. The flow meter was last calibrated on April 8, 2010.

13. Both skimmer return lines were functioning properly.
14. Both primary sludge return lines were functioning properly and returning medium brown water.
15. Both secondary sludge return lines were also functioning properly and returning medium brown water.
16. Scum/solids deposition was present behind the baffle in the settling tanks. This scum should be removed and properly disposed.
17. The weirs and the sidewalls in the settling tank were free of any solids deposition.
18. Minimal floating solids were present in the settling tank.
19. The treatment system has a Hydroclear rapid sand filter. The system appeared to be fully operational.
20. The treatment plant is also equipped with ultra violet disinfection. The system was operational.
21. The final effluent was clear.
22. No visual impact to the receiving stream was observed.

Mr. Davis indicated that the following improvements to the treatment system have been made since he took over operations:

1. Eight aeration tanks were taken off line and pumped out. Eighteen thousand gallons of 2.8% sludge were pumped out of the tanks.
2. Four new down pipes and 48 diffuser hydro seal disks were installed in the aeration tank this past June/July. The disks were installed at a depth of 13.5 feet.
3. All the weirs in the settling tank have been leveled with a laser.
4. Scum baffles were installed in front of the weirs in the 4 settling tanks.
5. Two new effluent pumps were installed this summer.
6. The original back wash pump was rebuilt by National Pump in Aurora and reinstalled May 28, 2010. This brought the drain time in the rapid sand filters back down to 2 minutes. Prior to rebuilding the original back wash pump, the drain time was 15 minutes due to an incorrect replacement pump that had been installed.
7. The header line to the aeration tanks is scheduled to be replaced with a 4 inch line in 2011.

This office has recently reviewed your self-monitoring reports covering the period February 1, 2006 through October 31, 2010 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

**Limit Violations**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00665	Phosphorus, Total (P)	30D Conc	2.5	3.	5/1/2006
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	4.	5/3/2007
001	00665	Phosphorus, Total (P)	30D Conc	2.5	3.2	7/1/2007
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.74	9/20/2007
001	00665	Phosphorus, Total (P)	30D Conc	2.5	3.35	1/1/2008
001	00665	Phosphorus, Total (P)	30D Qty	0.52	3.80393	1/1/2008
001	80082	CBOD 5 day	1D Qty	3.1	6.813	1/30/2008
001	00530	Total Suspended Solids	30D Conc	12	29.25	2/1/2008
001	00530	Total Suspended Solids	30D Qty	2.5	3.12073	2/1/2008
001	00530	Total Suspended Solids	1D Conc	18	21.	2/13/2008
001	00530	Total Suspended Solids	1D Conc	18	76.	2/20/2008
001	00530	Total Suspended Solids	1D Qty	3.8	8.05448	2/20/2008
001	00530	Total Suspended Solids	1D Conc	18	20.	2/27/2008
001	00530	Total Suspended Solids	30D Conc	12	27.	3/1/2008
001	00530	Total Suspended Solids	30D Qty	2.5	5.88757	3/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	7.7	3/6/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	1.42	1.74867	3/6/2008
001	00530	Total Suspended Solids	1D Conc	18	102.	3/13/2008
001	00530	Total Suspended Solids	1D Qty	3.8	22.7781	3/13/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	6.9	3/13/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	1.42	1.54087	3/13/2008
001	80082	CBOD 5 day	1D Conc	15	18.	3/13/2008
001	80082	CBOD 5 day	1D Qty	3.1	4.01967	3/13/2008
001	00665	Phosphorus, Total (P)	30D Conc	2.5	2.63	4/1/2008
001	00665	Phosphorus, Total (P)	30D Conc	2.5	5.55	5/1/2008
001	00665	Phosphorus, Total (P)	30D Qty	0.52	.56718	5/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	6/24/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.77	7/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	5.8	7/29/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.65	8/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	1.5	8/5/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.68	9/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	9/30/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	3.345	10/1/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	4.9	10/21/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.2	10/28/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	10.1	11/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	11/4/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	13.45	11/18/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	16.8166	12/1/2008

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	20.5	12/2/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	11.45	12/16/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	18.5	12/30/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	22.25	1/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.94	1.17004	1/1/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	25.75	1/13/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	1.42	1.55942	1/13/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	18.75	1/27/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	11.25	2/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.94	1.07589	2/1/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	9.3	2/10/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	13.2	2/24/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	6.15	4/1/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.8	6.85	4/21/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.68	7/1/2009
001	00665	Phosphorus, Total (P)	30D Conc	2.5	5.1	9/1/2009
001	00665	Phosphorus, Total (P)	30D Conc	2.5	3.55	10/1/2009
001	00665	Phosphorus, Total (P)	30D Conc	2.5	3.625	11/1/2009
001	00665	Phosphorus, Total (P)	30D Conc	2.5	2.54	12/1/2009
001	00665	Phosphorus, Total (P)	30D Conc	2.5	2.8	9/1/2010

Review of the above violations clearly shows that the facility has made significant strides in being compliant with its NPDES permit over the past year.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt