



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

February 12, 2010

RE: ROBIN MHP's INC.
PERMIT NO. 3PV00058
PORTAGE COUNTY
MANTUA

Mr. Ronald Weiss, General Partner
Robin MHP's Inc.
3000 Town Center
Suite 540
Southfield, MI 48075

Dear Mr. Weiss:

On January 14, 2010, an inspection of the above referenced facility was conducted to obtain and review information for drafting the facility's renewal NPDES wastewater permit. The facility was represented by Ms. Brenda Wieclaw, Park Office Manager. The purpose of the inspection was to: (1) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. Mr. Josh Goodridge from B&J Environmental remains the current operator of the wastewater treatment system.
2. B&J Environmental is responsible for collecting the samples and submitting the data in Ohio EPA's electronic discharge monitoring report (e-DMR) system.
3. The blowers were running and the plant was receiving good aeration.
4. The contents of both the northern and southern aeration tanks were medium brown in color and no foam was present.
5. All sludge return lines in the aeration tanks were functioning properly.
6. Also, the skimmer return line in each aeration tank was functioning properly and returning clear water.
7. No scum build-up was present behind the baffle in the settling tank.
8. The weirs and the sidewalls in the settling tank were also free of solids.
9. All four surface sand filter beds were operable. Two of the four beds were being utilized. The beds in use had a thin layer of sludge on the surface of the sand filter media. See Figure 1. The sludge layer should be raked off and properly disposed at a licensed landfill once the weather permits.
10. The effluent was clear.

11. No visual impact to the receiving stream was observed.
12. The facility's renewal NPDES permit has been drafted and was public noticed on January 28, 2010. Any comments or concerns you may have should be submitted in writing to the Northeast District Office prior to your existing permit's expiration date.
13. **It should be noted that the maximum permit limit for total suspended solids has been lowered from 18 mg/l to 15 mg/l. This change was made as a result of the recommendation made in the U.S. EPA approved Total Maximum Daily Load (TMDL) report (July 10, 2007) for the Chagrin River. The corresponding loading limit was also reduced.**

This office has recently reviewed your self-monitoring reports covering the period March 1, 2009 through December 31, 2009 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	00530	Total Suspended Solids	7D Conc	18	19.	4/15/2009
001	00530	Total Suspended Solids	7D Conc	18	19.	4/22/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3	3.4	5/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3	3.75	6/22/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	2.765	7/1/2009

FREQUENCY VIOLATIONS

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Day	1	0	03/01/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/01/2009
001	50050	Flow Rate	1/Day	1	0	03/01/2009
001	01330	Odor, Severity	1/Day	1	0	03/01/2009
001	00010	Water Temperature	1/Day	1	0	03/01/2009
001	00010	Water Temperature	1/Day	1	0	03/07/2009
001	00083	Color, Severity	1/Day	1	0	03/07/2009
001	01330	Odor, Severity	1/Day	1	0	03/07/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/07/2009
001	50050	Flow Rate	1/Day	1	0	03/07/2009
001	00010	Water Temperature	1/Day	1	0	03/08/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/08/2009
001	50050	Flow Rate	1/Day	1	0	03/08/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Day	1	0	03/08/2009
001	01330	Odor, Severity	1/Day	1	0	03/08/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/14/2009
001	50050	Flow Rate	1/Day	1	0	03/14/2009
001	00083	Color, Severity	1/Day	1	0	03/14/2009
001	01330	Odor, Severity	1/Day	1	0	03/14/2009
001	00010	Water Temperature	1/Day	1	0	03/14/2009
001	00010	Water Temperature	1/Day	1	0	03/15/2009
001	00083	Color, Severity	1/Day	1	0	03/15/2009
001	01330	Odor, Severity	1/Day	1	0	03/15/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/15/2009
001	50050	Flow Rate	1/Day	1	0	03/15/2009
001	00010	Water Temperature	1/Day	1	0	03/21/2009
001	00083	Color, Severity	1/Day	1	0	03/21/2009
001	01330	Odor, Severity	1/Day	1	0	03/21/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/21/2009
001	50050	Flow Rate	1/Day	1	0	03/21/2009
001	00010	Water Temperature	1/Day	1	0	03/22/2009
001	00083	Color, Severity	1/Day	1	0	03/22/2009
001	01330	Odor, Severity	1/Day	1	0	03/22/2009
001	50050	Flow Rate	1/Day	1	0	03/22/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/22/2009
001	00010	Water Temperature	1/Day	1	0	03/27/2009
001	00083	Color, Severity	1/Day	1	0	03/27/2009
001	01330	Odor, Severity	1/Day	1	0	03/27/2009
001	50050	Flow Rate	1/Day	1	0	03/27/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/27/2009
001	00083	Color, Severity	1/Day	1	0	03/28/2009
001	01330	Odor, Severity	1/Day	1	0	03/28/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/28/2009
001	50050	Flow Rate	1/Day	1	0	03/28/2009
001	00010	Water Temperature	1/Day	1	0	03/28/2009
001	00010	Water Temperature	1/Day	1	0	03/29/2009
001	01330	Odor, Severity	1/Day	1	0	03/29/2009
001	01350	Turbidity, Severity	1/Day	1	0	03/29/2009
001	50050	Flow Rate	1/Day	1	0	03/29/2009
001	00083	Color, Severity	1/Day	1	0	03/29/2009
001	80082	CBOD 5 day	1/Week	1	0	07/08/2009
001	00530	Total Suspended Solids	1/Week	1	0	07/08/2009
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	07/15/2009

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It appears that many of the frequency violations are the result of not completely filling out the electronic discharge monitoring report (e-DMR). All parameters, except flow, need not be monitored on days when the park is not normally staffed (Saturdays, Sundays, and Holidays). On those days, report "AN" on the discharge monitoring report. This should resolve the recurring frequency violations for water temperature, odor, color, and turbidity.

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

pc: Ms. Brenda Wieclaw, Park Office Manager



Figure 1