



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

September 29, 2008

RE: SUMMIT COUNTY
HUDSON
BULLOCK APARTMENTS
CEI/PRE-PERMIT INSPECTION
APPLICATION NO. OHO123943
OHIO EPA NO. 3PR00188

Mr. James C. Bullock, Owner
Bullock Apartments
P.O. Box 3051
Kent, OH 44240

Dear Mr. Bullock:

On September 17, 2008, a Compliance Evaluation/Pre-permit Inspection was conducted at the wastewater treatment plant serving Bullock Apartments. The plant consists of a 1000 gallon trash trap, followed by a 750 gallon aerated flow equalization tank, a 1750 gallon extended aeration treatment plant with 623 gallon clarifier, dosing chamber, a 162 square foot surface sand filter, and a 365 gallon chlorination/dechlorination tank. The plant discharges to a roadside ditch which proceeds to Tinkers Creek.

During the inspection, the following deficiencies were noted:

1. The sludge return line appeared to be returning clear water, rather than chocolate brown mixed liquor. Possibly the sludge return line is plugged.
2. The aeration tank contained slight white foam.
3. The clarifier contained a high amount of solids. It may be time to waste solids from the system.
4. It did not appear the surface sand filter contained the appropriate sand. According to Ohio EPA's "Greenbook", filter sand shall be clean and washed with an effective size between 0.4 and 1.0 mm., with a uniformity coefficient not greater than 3.0.

Review of the Discharge Monitoring Reports (DMRs) from September 2006 to September 2008 revealed the following numeric effluent violations:

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	Nitrogen, Ammonia (NH3)	30D Conc	3.0	32.	3/1/2007
March 2007	Nitrogen, Ammonia (NH3)	7D Conc	4.5	32.	3/8/2007
March 2007	Nitrogen, Ammonia (NH3)	30D Qty	0.02	.07267	3/1/2007
March 2007	Nitrogen, Ammonia (NH3)	7D Qty	0.03	.07267	3/8/2007
December 2006	Total Suspended Solids	30D Conc	12	25.	12/1/2006

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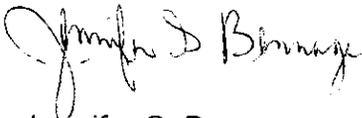
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2006	pH	1D Conc	6.5	6.31	12/29/2006
June 2007	Total Suspended Solids	30D Conc	12	23.	6/1/2007
June 2007	Total Suspended Solids	7D Conc	18	23.	6/1/2007
June 2007	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.7	6/1/2007
June 2007	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.7	6/1/2007
June 2007	pH	1D Conc	6.5	6.38	6/5/2007
June 2007	Dissolved Oxygen	1D Conc	6.0	4.5	6/5/2007
August 2007	Fecal Coliform	30D Conc	1000	1180.	8/1/2007
March 2008	Nitrogen, Ammonia (NH3)	30D Conc	3.0	10.95	3/1/2008
March 2008	Nitrogen, Ammonia (NH3)	7D Conc	4.5	10.95	3/22/2008
March 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.02	.02487	3/1/2008
December 2007	Nitrogen, Ammonia (NH3)	30D Conc	3.0	13.25	12/1/2007
December 2007	Nitrogen, Ammonia (NH3)	7D Conc	4.5	13.25	12/15/2007
December 2007	Nitrogen, Ammonia (NH3)	30D Qty	0.02	.03009	12/1/2007
December 2007	Nitrogen, Ammonia (NH3)	7D Qty	0.03	.03009	12/15/2007
June 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.6	6/1/2008
June 2008	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.6	6/22/2008

It appears you are in Significant Non-Compliance with your ammonia limitations. It is directed your technical plant operator explain, in writing, the reasons for the ammonia violations. It is also directed your operator outline what type of plant improvements may be accomplished to address the violations and a proposed timeframe to complete those improvements.

Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111. Please notify this office by October 13, 2008 of your intent to address the aforementioned significant violations.

The Public Notice of your draft renewal NPDES permit will be published. Please read the draft permit carefully. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water

JSB/mt