



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 16, 2011

RE: SUMMIT COUNTY
HUDSON
BULLOCK APARTMENTS
COMPLIANCE EVALUATION INSPECTION
OHIO EPA NO. 3PR00188

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

Dear Mr. Bullock:

On May 11, 2011, a Compliance Evaluation 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 mixed liquor in the aeration tank appeared to be light in color. The tank may be low in solids, because it appeared that one of the return lines from the clarifier was not operating. Also, the clarifier needs solids removed from it as soon as possible. One side of the surface sand filter contained some solids and weeds. The effluent from the plant appeared to be clear of visible solids. In conclusion, the plant appeared to be in satisfactory operation and maintenance condition.

Review of the Discharge Monitoring Reports (DMRs) from April 2010 to May 2011 revealed no numeric effluent violations, but revealed numerous sampling frequency violations:

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2010	Color, Severity	1/Week	1	0	05/01/2010
May 2010	Odor, Severity	1/Week	1	0	05/01/2010
May 2010	Turbidity, Severity	1/Week	1	0	05/01/2010
May 2010	Flow Rate	1/Month	1	0	05/01/2010
May 2010	Water Temperature	1/Week	1	0	05/08/2010
May 2010	Color, Severity	1/Week	1	0	05/08/2010
May 2010	Odor, Severity	1/Week	1	0	05/08/2010
May 2010	Turbidity, Severity	1/Week	1	0	05/08/2010
May 2010	Water Temperature	1/Week	1	0	05/15/2010

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Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2010	Color, Severity	1/Week	1	0	05/15/2010
May 2010	Odor, Severity	1/Week	1	0	05/15/2010
May 2010	Turbidity, Severity	1/Week	1	0	05/15/2010
May 2010	Water Temperature	1/Week	1	0	05/22/2010
May 2010	Color, Severity	1/Week	1	0	05/22/2010
May 2010	Odor, Severity	1/Week	1	0	05/22/2010
May 2010	Turbidity, Severity	1/Week	1	0	05/22/2010
July 2010	Color, Severity	1/Week	1	0	07/01/2010
July 2010	Odor, Severity	1/Week	1	0	07/01/2010
July 2010	Turbidity, Severity	1/Week	1	0	07/01/2010
July 2010	Flow Rate	1/Month	1	0	07/01/2010
July 2010	Water Temperature	1/Week	1	0	07/08/2010
July 2010	Color, Severity	1/Week	1	0	07/08/2010
July 2010	Odor, Severity	1/Week	1	0	07/08/2010
July 2010	Turbidity, Severity	1/Week	1	0	07/08/2010
July 2010	Water Temperature	1/Week	1	0	07/15/2010
July 2010	Color, Severity	1/Week	1	0	07/15/2010
July 2010	Odor, Severity	1/Week	1	0	07/15/2010
July 2010	Turbidity, Severity	1/Week	1	0	07/15/2010
July 2010	Water Temperature	1/Week	1	0	07/22/2010
July 2010	Color, Severity	1/Week	1	0	07/22/2010
July 2010	Odor, Severity	1/Week	1	0	07/22/2010
July 2010	Turbidity, Severity	1/Week	1	0	07/22/2010
August 2010	Color, Severity	1/Week	1	0	08/01/2010
August 2010	Total Suspended Solids	1/Quarter	1	0	08/01/2010
August 2010	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	08/01/2010
August 2010	Odor, Severity	1/Week	1	0	08/01/2010
August 2010	Turbidity, Severity	1/Week	1	0	08/01/2010
August 2010	Fecal Coliform	1/Quarter	1	0	08/01/2010
August 2010	CBOD 5 day	1/Quarter	1	0	08/01/2010
August 2010	Chlorine, Total Residu	1/Quarter	1	0	08/01/2010
August 2010	pH	1/Quarter	1	0	08/01/2010
August 2010	Flow Rate	1/Month	1	0	08/01/2010
August 2010	Dissolved Oxygen	1/Quarter	1	0	08/01/2010
August 2010	Water Temperature	1/Week	1	0	08/08/2010
August 2010	Color, Severity	1/Week	1	0	08/08/2010
August 2010	Odor, Severity	1/Week	1	0	08/08/2010
August 2010	Turbidity, Severity	1/Week	1	0	08/08/2010
August 2010	Water Temperature	1/Week	1	0	08/15/2010
August 2010	Color, Severity	1/Week	1	0	08/15/2010
August 2010	Odor, Severity	1/Week	1	0	08/15/2010
August 2010	Turbidity, Severity	1/Week	1	0	08/15/2010
August 2010	Water Temperature	1/Week	1	0	08/22/2010

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Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2010	Color, Severity	1/Week	1	0	08/22/2010
August 2010	Odor, Severity	1/Week	1	0	08/22/2010
August 2010	Turbidity, Severity	1/Week	1	0	08/22/2010
September 2010	Color, Severity	1/Week	1	0	09/01/2010
September 2010	Odor, Severity	1/Week	1	0	09/01/2010
September 2010	Turbidity, Severity	1/Week	1	0	09/01/2010
September 2010	Flow Rate	1/Month	1	0	09/01/2010
September 2010	Water Temperature	1/Week	1	0	09/08/2010
September 2010	Color, Severity	1/Week	1	0	09/08/2010
September 2010	Odor, Severity	1/Week	1	0	09/08/2010
September 2010	Turbidity, Severity	1/Week	1	0	09/08/2010
September 2010	Water Temperature	1/Week	1	0	09/15/2010
September 2010	Color, Severity	1/Week	1	0	09/15/2010
September 2010	Odor, Severity	1/Week	1	0	09/15/2010
September 2010	Turbidity, Severity	1/Week	1	0	09/15/2010
September 2010	Water Temperature	1/Week	1	0	09/22/2010
September 2010	Color, Severity	1/Week	1	0	09/22/2010
September 2010	Odor, Severity	1/Week	1	0	09/22/2010
September 2010	Turbidity, Severity	1/Week	1	0	09/22/2010
October 2010	Color, Severity	1/Week	1	0	10/01/2010
October 2010	Odor, Severity	1/Week	1	0	10/01/2010
October 2010	Turbidity, Severity	1/Week	1	0	10/01/2010
October 2010	Flow Rate	1/Month	1	0	10/01/2010
October 2010	Water Temperature	1/Week	1	0	10/08/2010
October 2010	Color, Severity	1/Week	1	0	10/08/2010
October 2010	Odor, Severity	1/Week	1	0	10/08/2010
October 2010	Turbidity, Severity	1/Week	1	0	10/08/2010
October 2010	Water Temperature	1/Week	1	0	10/15/2010
October 2010	Color, Severity	1/Week	1	0	10/15/2010
October 2010	Odor, Severity	1/Week	1	0	10/15/2010
October 2010	Turbidity, Severity	1/Week	1	0	10/15/2010
October 2010	Water Temperature	1/Week	1	0	10/22/2010
October 2010	Color, Severity	1/Week	1	0	10/22/2010
October 2010	Odor, Severity	1/Week	1	0	10/22/2010
October 2010	Turbidity, Severity	1/Week	1	0	10/22/2010
November 2010	Odor, Severity	1/Week	1	0	11/01/2010
November 2010	Turbidity, Severity	1/Week	1	0	11/01/2010
November 2010	Flow Rate	1/Month	1	0	11/01/2010
November 2010	Color, Severity	1/Week	1	0	11/01/2010
November 2010	Color, Severity	1/Week	1	0	11/08/2010
November 2010	Odor, Severity	1/Week	1	0	11/08/2010
November 2010	Turbidity, Severity	1/Week	1	0	11/08/2010
November 2010	Water Temperature	1/Week	1	0	11/08/2010

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Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
November 2010	Color, Severity	1/Week	1	0	11/15/2010
November 2010	Odor, Severity	1/Week	1	0	11/15/2010
November 2010	Turbidity, Severity	1/Week	1	0	11/15/2010
November 2010	Water Temperature	1/Week	1	0	11/15/2010
November 2010	Color, Severity	1/Week	1	0	11/22/2010
November 2010	Odor, Severity	1/Week	1	0	11/22/2010
November 2010	Turbidity, Severity	1/Week	1	0	11/22/2010
November 2010	Water Temperature	1/Week	1	0	11/22/2010
December 2010	Color, Severity	1/Week	1	0	12/01/2010
December 2010	Total Suspended Solids	1/Quarter	1	0	12/01/2010
December 2010	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	12/01/2010
December 2010	Odor, Severity	1/Week	1	0	12/01/2010
December 2010	Turbidity, Severity	1/Week	1	0	12/01/2010
December 2010	CBOD 5 day	1/Quarter	1	0	12/01/2010
December 2010	pH	1/Quarter	1	0	12/01/2010
December 2010	Flow Rate	1/Month	1	0	12/01/2010
December 2010	Dissolved Oxygen	1/Quarter	1	0	12/01/2010
December 2010	Water Temperature	1/Week	1	0	12/08/2010
December 2010	Color, Severity	1/Week	1	0	12/08/2010
December 2010	Odor, Severity	1/Week	1	0	12/08/2010
December 2010	Turbidity, Severity	1/Week	1	0	12/08/2010
December 2010	Water Temperature	1/Week	1	0	12/15/2010
December 2010	Color, Severity	1/Week	1	0	12/15/2010
December 2010	Odor, Severity	1/Week	1	0	12/15/2010
December 2010	Turbidity, Severity	1/Week	1	0	12/15/2010
December 2010	Water Temperature	1/Week	1	0	12/22/2010
December 2010	Color, Severity	1/Week	1	0	12/22/2010
December 2010	Odor, Severity	1/Week	1	0	12/22/2010
December 2010	Turbidity, Severity	1/Week	1	0	12/22/2010
January 2011	Color, Severity	1/Week	1	0	01/01/2011
January 2011	Odor, Severity	1/Week	1	0	01/01/2011
January 2011	Turbidity, Severity	1/Week	1	0	01/01/2011
January 2011	Flow Rate	1/Month	1	0	01/01/2011
January 2011	Water Temperature	1/Week	1	0	01/08/2011
January 2011	Color, Severity	1/Week	1	0	01/08/2011
January 2011	Odor, Severity	1/Week	1	0	01/08/2011
January 2011	Turbidity, Severity	1/Week	1	0	01/08/2011
January 2011	Water Temperature	1/Week	1	0	01/15/2011
January 2011	Color, Severity	1/Week	1	0	01/15/2011
January 2011	Odor, Severity	1/Week	1	0	01/15/2011
January 2011	Turbidity, Severity	1/Week	1	0	01/15/2011
January 2011	Water Temperature	1/Week	1	0	01/22/2011
January 2011	Color, Severity	1/Week	1	0	01/22/2011

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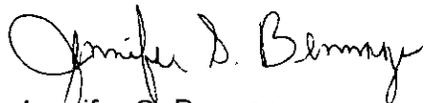
Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2011	Odor, Severity	1/Week	1	0	01/22/2011
January 2011	Turbidity, Severity	1/Week	1	0	01/22/2011
February 2011	Color, Severity	1/Week	1	0	02/01/2011
February 2011	Odor, Severity	1/Week	1	0	02/01/2011
February 2011	Turbidity, Severity	1/Week	1	0	02/01/2011
February 2011	Flow Rate	1/Month	1	0	02/01/2011
February 2011	Water Temperature	1/Week	1	0	02/08/2011
February 2011	Color, Severity	1/Week	1	0	02/08/2011
February 2011	Odor, Severity	1/Week	1	0	02/08/2011
February 2011	Turbidity, Severity	1/Week	1	0	02/08/2011
February 2011	Water Temperature	1/Week	1	0	02/15/2011
February 2011	Color, Severity	1/Week	1	0	02/15/2011
February 2011	Odor, Severity	1/Week	1	0	02/15/2011
February 2011	Turbidity, Severity	1/Week	1	0	02/15/2011
February 2011	Water Temperature	1/Week	1	0	02/22/2011
February 2011	Color, Severity	1/Week	1	0	02/22/2011
February 2011	Odor, Severity	1/Week	1	0	02/22/2011
February 2011	Turbidity, Severity	1/Week	1	0	02/22/2011
March 2011	Color, Severity	1/Week	1	0	03/01/2011
March 2011	Total Suspended Solids	1/Quarter	1	0	03/01/2011
March 2011	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	03/01/2011
March 2011	Odor, Severity	1/Week	1	0	03/01/2011
March 2011	Turbidity, Severity	1/Week	1	0	03/01/2011
March 2011	CBOD 5 day	1/Quarter	1	0	03/01/2011
March 2011	pH	1/Quarter	1	0	03/01/2011
March 2011	Flow Rate	1/Month	1	0	03/01/2011
March 2011	Dissolved Oxygen	1/Quarter	1	0	03/01/2011
March 2011	Water Temperature	1/Week	1	0	03/08/2011
March 2011	Color, Severity	1/Week	1	0	03/08/2011
March 2011	Odor, Severity	1/Week	1	0	03/08/2011
March 2011	Turbidity, Severity	1/Week	1	0	03/08/2011
March 2011	Water Temperature	1/Week	1	0	03/15/2011
March 2011	Color, Severity	1/Week	1	0	03/15/2011
March 2011	Odor, Severity	1/Week	1	0	03/15/2011
March 2011	Turbidity, Severity	1/Week	1	0	03/15/2011
March 2011	Water Temperature	1/Week	1	0	03/22/2011
March 2011	Color, Severity	1/Week	1	0	03/22/2011
March 2011	Odor, Severity	1/Week	1	0	03/22/2011
March 2011	Turbidity, Severity	1/Week	1	0	03/22/2011
April 2011	Color, Severity	1/Week	1	0	04/01/2011
April 2011	Odor, Severity	1/Week	1	0	04/01/2011
April 2011	Turbidity, Severity	1/Week	1	0	04/01/2011
April 2011	Flow Rate	1/Month	1	0	04/01/2011

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Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
April 2011	Water Temperature	1/Week	1	0	04/08/2011
April 2011	Color, Severity	1/Week	1	0	04/08/2011
April 2011	Odor, Severity	1/Week	1	0	04/08/2011
April 2011	Turbidity, Severity	1/Week	1	0	04/08/2011
April 2011	Water Temperature	1/Week	1	0	04/15/2011
April 2011	Color, Severity	1/Week	1	0	04/15/2011
April 2011	Odor, Severity	1/Week	1	0	04/15/2011
April 2011	Turbidity, Severity	1/Week	1	0	04/15/2011
April 2011	Water Temperature	1/Week	1	0	04/22/2011
April 2011	Color, Severity	1/Week	1	0	04/22/2011
April 2011	Odor, Severity	1/Week	1	0	04/22/2011
April 2011	Turbidity, Severity	1/Week	1	0	04/22/2011

Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111. It is directed your technical plant operator explain, in writing, the reasons for the numerous frequency violations. It may be helpful if your operator and this office discuss the NPDES permit language; possibly there is some misunderstanding about the required sampling frequencies. Should you have any questions concerning this letter, please contact me at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water

JSB/mt

cc: Summit County Health Dept.