



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

January 15, 2010

RE: WAYNE COUNTY
EAST UNION TWP.
GLEN RIDGE MHP
NPDES PERMIT 3PV00092

Mr. Thomas Funk
Touchdown Properties, Ltd
4805 Munson Street, N.W.
Canton, Ohio 44718

Dear Mr. Funk:

On January 12, 2010, this writer met with Mrs. Joyce Kick to conduct an inspection of the wastewater treatment plant serving the Glen Ridge Mobile Home Park (MHP). The intent of the inspection was to gather information for the renewal of your NPDES permit. Below are the findings and recommendations from the inspection:

At the time of the inspection, the wastewater treatment plant was producing what appeared to be a satisfactory quality effluent. The 14,000 gpd plant was in fair operation and maintenance condition.

INSPECTION

- 1) It is understood the trash trap is pumped out about four to five times a year. At the time of the inspection, the trash trap riser was cracked and a large piece of concrete was missing. The cracked riser has compromised the watertight manhole lid seal and therefore provides an entrance for storm water (such as rainwater and melting snow) into the system. This must be repaired within 30 days from the date of this letter. Written notification must be provided when this has been repaired. Failure to complete this will result in further enforcement action to be taken by this office.
- 2) The flow equalization tank was in good condition and provided with adequate aeration. There is a distribution pipe located between the flow equalization tank and the aeration tank. It is understood this pipe cracked and began leaking raw sewage sometime during the later part of the day on January 11, 2010. This leak was noticed by a MHP employee on the morning of January 12, 2010 and repairs to the pipe began immediately. The pipe repair had been completed by the time of the inspection on the afternoon of January 12. At the time of the inspection, raw sewage was located around the aeration tank. This is a health nuisance and must be cleaned up immediately. Anytime there is a spill or overflow of sewage, Part III of your NPDES permit requires you to report the overflow to this office within 24 hours of discovery at 1-800-282-9378.
- 3) It was also noted during the inspection that the aeration tanks were operating at a level that was nearly full. During the inspection, the mixed liquor within the tank was splashing up out of the tank and onto the surrounding area. This is a health nuisance since mixed liquor is considered raw sewage. The level of sewage within

the wastewater treatment plant indicates the wastewater treatment plant is hydraulically overloaded. The hydraulic overloading of the wastewater plant was a concern at the time of this office's previous inspection on November 27, 2007 (see enclosed letter).

- 4) The flows recorded on the eDMR for this facility show average daily flows in excess of 14,000 gpd. The wastewater treatment plant is designed to handle a design average flow of 14,000 gpd. The plant is currently overloaded and the wastewater treatment plant is showing signs of stress.

It is understood the MHP undertook dye testing a few years ago which indicated there were no clean water connections to the wastewater system. To date, this office has not received a copy of this study. Please note, at the time of this office's last inspection (November 27, 2007), it was noted that the backwash water from the water treatment plant's greensand filter discharges to the wastewater treatment plant. As noted previously by this office, this connection was not included in the Permit-to-Install (02-17875) issued on September 26, 2003. This addition of the backwash water may be the cause of the overloading conditions at the wastewater treatment plant.

As such, this office is recommending the MHP evaluate the water treatment plant's greensand filter backwash water point of discharge. Conduct dye testing of the backwash water from the greensand filter and submit results to this office no later than 30 days from the date of this letter.

- 5) The aeration tank contained mixed liquor that was a rich chocolate brown color and the sludge return lines were returning rich dark solids. The tank was provided with adequate air circulation and had adequate rollover. The clarifier/settling tank was full of floating solids and scum. The influent baffle was packed with solids as well and the weir had some solids accumulation present. The skimmer could not be located due to the presence of solids on the surface of the tank. It is understood the surface had not been skimmed off and the plant had been shut down for about 10 hours due to the pipe leak. The effluent from the clarifier was a brownish color which indicates the settling of solids is not taking place within the tank and there is a need to waste solids from the system. The upflow fixed media appeared to contain murky water with some floating solids. There was some solids accumulation on the weirs.
- 6) The sludge holding tank was less than half full and was provided with adequate air circulation. The system will benefit from wasting sludge to the sludge holding tank more often.
- 7) The distribution box to the surface sand filters contained solids. The west surface sand filter was in operation was in poor condition with the media overloaded with sludge, leaves, sediment and some vegetation. The media must be excavated out to remove the sludge and sediment laden media and replaced with Ohio EPA approved media. This removed sand media and debris must not be dumped on your property.

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The removed material is considered a solid waste and must be disposed of at an Ohio EPA licensed solid waste facility.

- 8) The UV system was not in operation at the time of the inspection (off season). It is understood there have been ongoing issues with the operation of UV lamps and there have been lamps shorting out. Mrs. Kicks indicated an appointment was scheduled for maintenance work on the unit. Per your NPDES permit, disinfection of your effluent is required during the summer months (May through October). As the operation of the UV unit was a problem at the time of the previous inspection, this office is requesting you provide written notification to this office once the maintenance appointment has been conducted. The follow up appointment must be completed within 60 days from the date of this letter.
- 9) It was understood Mrs. Kicks has an interest in obtaining the Class A wastewater operator license. This office recommends continued training of staff for the operation of the wastewater treatment plant. Training courses for the Class A Wastewater Operator License are offered, free of charge, throughout the year at the Ohio EPA Northeast District Office. Please check the Ohio EPA Web site periodically at <http://www.epa.ohio.gov/dsw/opcert/opcert> for upcoming training courses.

VIOLATION SUMMARY

A summary of wastewater treatment plant discharge and frequency violations for the period of December 1, 2007 through January 1, 2010 has been attached to this letter. Please review all plant data to ensure the violations are accurate. Any reporting errors or eDMR errors must be reported to the Ohio EPA so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly

NPDES PERMIT

Your NPDES renewal permit will be drafted in the near future and public noticed. Once the permit is public noticed, you will have 30 days to make any comments. Please be aware, the renewal permit will contain a compliance schedule recommending the following:

- a) Comprehensive Performance Evaluation (CPE) of the wastewater treatment plant by a Professional Engineer. The intent of the CPE is to determine the condition, efficiency and capacity of each treatment plant component and provide recommendations for upgrades to the facility. It will be the engineer's responsibility to determine what upgrades are needed to bring the plant into compliance with Ohio EPA's 1993 edition of the "Greenbook", otherwise known as "Sewage: Collection, Treatment and Disposal Where Public Sewers are not Available". A report summarizing the findings of the CPE shall be submitted to the Ohio EPA, Northeast District Office.
- b) The MHP shall initiate an evaluation of its sanitary sewer collection system to determine sources or causes of excessive infiltration and inflow (I/I). The I&I Study must be done in accordance with the U.S. EPA Handbook "Sewer System Infrastructure Analysis and Rehabilitation,"

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IN SUMMARY

The following items are of immediate concern to this office and must be attended to immediately.

- 1) Repair cracked trash trap riser within 20 days of the date of this letter.
- 2) Immediately clean up the spilled sewage surrounding the area of the aeration tank and flow equalization tank.
- 3) Conduct dye testing of the water treatment plant greensand filter and submit results to this office within 30 days of the date of this letter.
- 4) Conduct UV Disinfection System maintenance as soon as possible but no later than 60 days from the date of this letter. Submit written notification to this office that the maintenance appointment was completed.

To prevent further enforcement action to be taken by this office, you must complete the recommendations as stated in this letter within the provided timeline. If you do not believe this timeline is adequate, you must contact this office immediately to revise the dates.

If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

cc: Philip Gnacinski, Wayne County Health Department
Mrs. Joyce Kicks, Touchdown Properties
Mr. Rick Jackson, Smithville Western Care

File: Semi-Public/Wayne/E Union Twp/GlenRidgeMHP(Orrville Inn)

Discharge Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2008	001	CBOD 5 day	30D Conc	10	64.	4/1/2008
April 2008	001	CBOD 5 day	7D Conc	15	64.	4/15/2008
June 2008	001	Fecal Coliform	30D Conc	1000	1900.	6/1/2008
July 2009	001	Fecal Coliform	30D Conc	1000	2400.	7/1/2009
July 2009	001	Fecal Coliform	7D Conc	2000	2400.	7/22/2009

Frequency Violations

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2008	001	Water Temperature	1/Week	1	0	03/01/2008
May 2008	001	Water Temperature	1/Week	1	0	05/01/2008
May 2008	001	Color, Severity	1/Day	1	0	05/01/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/01/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/01/2008
May 2008	001	pH	1/2Weeks	1	0	05/01/2008
May 2008	001	Flow Rate	1/Day	1	0	05/01/2008
May 2008	001	Dissolved Oxygen	1/Week	1	0	05/01/2008
May 2008	001	Color, Severity	1/Day	1	0	05/02/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/02/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/02/2008
May 2008	001	Flow Rate	1/Day	1	0	05/02/2008
May 2008	001	Color, Severity	1/Day	1	0	05/03/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/03/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/03/2008
May 2008	001	Flow Rate	1/Day	1	0	05/03/2008
May 2008	001	Color, Severity	1/Day	1	0	05/04/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/04/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/04/2008
May 2008	001	Flow Rate	1/Day	1	0	05/04/2008
May 2008	001	Color, Severity	1/Day	1	0	05/05/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/05/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/05/2008
May 2008	001	Flow Rate	1/Day	1	0	05/05/2008
May 2008	001	Color, Severity	1/Day	1	0	05/06/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/06/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/06/2008
May 2008	001	Flow Rate	1/Day	1	0	05/06/2008
May 2008	001	Color, Severity	1/Day	1	0	05/07/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/07/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/07/2008
May 2008	001	Flow Rate	1/Day	1	0	05/07/2008
May 2008	001	Water Temperature	1/Week	1	0	05/08/2008
May 2008	001	Color, Severity	1/Day	1	0	05/08/2008

Reporting Period		Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May	2008	001	Odor, Severity	1/Day	1	0	05/08/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/08/2008
May	2008	001	Flow Rate	1/Day	1	0	05/08/2008
May	2008	001	Dissolved Oxygen	1/Week	1	0	05/08/2008
May	2008	001	Color, Severity	1/Day	1	0	05/09/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/09/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/09/2008
May	2008	001	Flow Rate	1/Day	1	0	05/09/2008
May	2008	001	Color, Severity	1/Day	1	0	05/10/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/10/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/10/2008
May	2008	001	Flow Rate	1/Day	1	0	05/10/2008
May	2008	001	Color, Severity	1/Day	1	0	05/11/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/11/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/11/2008
May	2008	001	Flow Rate	1/Day	1	0	05/11/2008
May	2008	001	Color, Severity	1/Day	1	0	05/12/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/12/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/12/2008
May	2008	001	Flow Rate	1/Day	1	0	05/12/2008
May	2008	001	Color, Severity	1/Day	1	0	05/13/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/13/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/13/2008
May	2008	001	Flow Rate	1/Day	1	0	05/13/2008
May	2008	001	Color, Severity	1/Day	1	0	05/14/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/14/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/14/2008
May	2008	001	Flow Rate	1/Day	1	0	05/14/2008
May	2008	001	Water Temperature	1/Week	1	0	05/15/2008
May	2008	001	Color, Severity	1/Day	1	0	05/15/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/15/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/15/2008
May	2008	001	pH	1/2Weeks	1	0	05/15/2008
May	2008	001	Flow Rate	1/Day	1	0	05/15/2008
May	2008	001	Dissolved Oxygen	1/Week	1	0	05/15/2008
May	2008	001	Color, Severity	1/Day	1	0	05/16/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/16/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/16/2008
May	2008	001	Flow Rate	1/Day	1	0	05/16/2008
May	2008	001	Color, Severity	1/Day	1	0	05/17/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/17/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/17/2008
May	2008	001	Flow Rate	1/Day	1	0	05/17/2008
May	2008	001	Color, Severity	1/Day	1	0	05/18/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/18/2008

Reporting Period		Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May	2008	001	Turbidity, Severity	1/Day	1	0	05/18/2008
May	2008	001	Flow Rate	1/Day	1	0	05/18/2008
May	2008	001	Color, Severity	1/Day	1	0	05/19/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/19/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/19/2008
May	2008	001	Flow Rate	1/Day	1	0	05/19/2008
May	2008	001	Color, Severity	1/Day	1	0	05/20/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/20/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/20/2008
May	2008	001	Flow Rate	1/Day	1	0	05/20/2008
May	2008	001	Color, Severity	1/Day	1	0	05/21/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/21/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/21/2008
May	2008	001	Flow Rate	1/Day	1	0	05/21/2008
May	2008	001	Water Temperature	1/Week	1	0	05/22/2008
May	2008	001	Color, Severity	1/Day	1	0	05/22/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/22/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/22/2008
May	2008	001	Flow Rate	1/Day	1	0	05/22/2008
May	2008	001	Dissolved Oxygen	1/Week	1	0	05/22/2008
May	2008	001	Color, Severity	1/Day	1	0	05/23/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/23/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/23/2008
May	2008	001	Flow Rate	1/Day	1	0	05/23/2008
May	2008	001	Color, Severity	1/Day	1	0	05/24/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/24/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/24/2008
May	2008	001	Flow Rate	1/Day	1	0	05/24/2008
May	2008	001	Color, Severity	1/Day	1	0	05/25/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/25/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/25/2008
May	2008	001	Flow Rate	1/Day	1	0	05/25/2008
May	2008	001	Color, Severity	1/Day	1	0	05/26/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/26/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/26/2008
May	2008	001	Flow Rate	1/Day	1	0	05/26/2008
May	2008	001	Color, Severity	1/Day	1	0	05/27/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/27/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/27/2008
May	2008	001	Flow Rate	1/Day	1	0	05/27/2008
May	2008	001	Color, Severity	1/Day	1	0	05/28/2008
May	2008	001	Odor, Severity	1/Day	1	0	05/28/2008
May	2008	001	Turbidity, Severity	1/Day	1	0	05/28/2008
May	2008	001	Flow Rate	1/Day	1	0	05/28/2008
May	2008	001	Color, Severity	1/Day	1	0	05/29/2008

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2008	001	Odor, Severity	1/Day	1	0	05/29/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/29/2008
May 2008	001	Flow Rate	1/Day	1	0	05/29/2008
May 2008	001	Color, Severity	1/Day	1	0	05/30/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/30/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/30/2008
May 2008	001	Flow Rate	1/Day	1	0	05/30/2008
May 2008	001	Color, Severity	1/Day	1	0	05/31/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/31/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/31/2008
May 2008	001	Flow Rate	1/Day	1	0	05/31/2008