



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

August 23, 2007

RE: WAYNE COUNTY
SUGARCREEK TWP
LINCOLN TERRACE ESTATES
17874 E. LINCOLN WAY

Mr. James A. Moore
4425 West Airport Freeway, Suite 475
Irving, TX 75062

Dear Mr. Moore:

On August 9, 2007, this writer met with Tony Weirich and Marvin Mitchell to conduct a pre-permit inspection of the sewage treatment plant serving the Lincoln Terrace Estates Mobile Home Park. Below are our findings and recommendations from the inspection:

At the time of the inspection, the treatment plant effluent could not be located. However, the effluent from the chlorine contact tank appeared to be slightly cloudy. The plant components did appear to be in good operation.

The wastewater system consists of a trash trap, extended aeration plant, upflow clarifiers, slow surface sand filters, chlorine contact tank, sludge holding tank and sludge drying beds. The trash trap was nearly full at the time of the inspection. According to Mr. Weirich, the trash trap is pumped out once a year and the pumping frequency is dictated by the thickness of the solids within the tank. The mixed liquor in the aeration tank was chocolate brown in color and the sludge return lines were in operation and returning solids of a dark brown color. The clarifier had some scum buildup on the surface and there was significant solids buildup in the scum chamber and the weirs contained some algae and solids buildup. The clarifier walls may need to be scraped down and the weirs should be cleaned periodically. The clarifier effluent appeared to be clear.

The sand filters were in good condition at the time of the inspection. The chlorine contact tank was in good condition and there is no dechlorination. Currently, the National Pollutant Discharge Elimination System (NPDES) permit for this facility contains a limit for Chlorine of 0.019 mg/l (max). The system risks being in violation of the NPDES permit if the wastewater treatment plant is not provided with dechlorination to remove some chlorine from the discharge. Over the past four years, the system has been in significant violation of the chlorine limit in the NPDES permit. When this issue was discussed at the time of the inspection, Mr. Weirich indicated that the facility may be interested in Ultra Violet (UV) as a potential treatment alternative to chlorine and dechlorination. As such, your draft NPDES permit will include a compliance schedule for the installation of UV disinfection facilities (or dechlorination facilities).

The compliance schedule will give the facility two months from the effective date of this NPDES permit to submit a permit-to-install (PTI) application to this office for review. The renewal NPDES permit will not become effective until February/March 2008. Therefore, we would anticipate the updated equipment would be online and operating before May 2008. Your renewal NPDES permit will contain a chlorine limit. If you choose to go with UV, the chlorine limit will need to be removed from the permit. As such, please notify this office as soon as possible as to the treatment technique chosen (UV versus dechlorination) so we may customize the permit accordingly.

Mr. James A. Moore
Lincoln Terrace Estates
August 23, 2007
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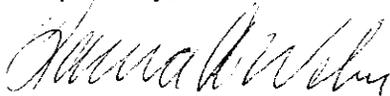
As a reminder, any change in the treatment process requires a permit-to-install application (PTI) be submitted to this office for review. The PTI must be approved by this office prior to installation of the treatment unit. Four sets of detailed plans of the sewage treatment system must be prepared and stamped by a Professional Engineer and submitted to this office. They will be forwarded to the Director's Office with our recommendations. The Professional Engineer preparing the plans shall also be responsible for overseeing the installation of the system. Your contract with the engineer must include inspection during construction. In accordance with the Ohio Revised Code Section 6111.44, you must receive formal approval from the Director's Office prior to construction. The enclosed Plan Approval Procedures must be followed. All fees, applications, and data sheets must be completed and included with the submission of detail plans before the plans can be processed for approval.

The sludge holding tanks were slightly full at the time of the inspection and the sludge appeared to have a rich brown color. The sludge drying beds looked to be in good condition. There was some vegetative growth on the filter not in use but the in use filter contained a good dried cake of sludge. According to Mr. Weirich, the sludge is pumped from the holding tanks to the sludge drying beds. Once the sludge dries to a solid cake, it is removed and hauled to a solid waste handling facility. Occasionally, the liquid sludge is removed from the holding tanks and sent to Canton Wastewater Treatment Plant. Most of the solids hauled to Canton are from the trash trap.

A summary of the wastewater treatment plant discharge violation for the period of January 2003 to July 2007 has been attached to this letter. We understand the chlorine violations that occurred are because the plant does not currently provide dechlorination.

The existing National Pollutant Discharge Elimination System (NPDES) permit for this facility expires on January 31, 2008. The renewal NPDES permit for this facility is being drafted and will be public noticed in the near future. You will have 30 days from the date of the public notice to submit comments to Ohio EPA regarding the draft permit. Overall, the results of the inspection were satisfactory. 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

attachment

ec: Rich D. Blasick, P.E., Ohio EPA, DSW, NEDO

File: Semi-Public/Wayne/Sugarcreek Twp/Lincoln Terrace MHP



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File: Semi-Public/Wayne/Sugarcreek Twp/Lincoln Terrace MHP

Attachment

Reporting Period	Station	Parameter	Limit	Reported Value	Violation Date
September2003	001	CBOD 5 day	2.16	2.22558	9/22/2003
May 2006	001	CBOD 5 day	2.16	2.22558	5/15/2006
February 2007	001	CBOD 5 day	15	26.	2/22/2007
February 2007	001	CBOD 5 day	2.16	2.36184	2/22/2007
May 2003	001	Chlorine, Total Residu	0.019	.2	5/8/2003
May 2003	001	Chlorine, Total Residu	0.019	.1	5/15/2003
May 2003	001	Chlorine, Total Residu	0.019	.1	5/22/2003
May 2003	001	Chlorine, Total Residu	0.019	.1	5/29/2003
June 2003	001	Chlorine, Total Residu	0.019	.2	6/6/2003
June 2003	001	Chlorine, Total Residu	0.019	.1	6/12/2003
June 2003	001	Chlorine, Total Residu	0.019	.1	6/19/2003
June 2003	001	Chlorine, Total Residu	0.019	.2	6/26/2003
July 2003	001	Chlorine, Total Residu	0.019	.1	7/3/2003
July 2003	001	Chlorine, Total Residu	0.019	.1	7/17/2003
July 2003	001	Chlorine, Total Residu	0.019	.1	7/24/2003
August 2003	001	Chlorine, Total Residu	0.019	.1	8/1/2003
August 2003	001	Chlorine, Total Residu	0.019	.1	8/7/2003
August 2003	001	Chlorine, Total Residu	0.019	.1	8/14/2003
August 2003	001	Chlorine, Total Residu	0.019	.1	8/21/2003
August 2003	001	Chlorine, Total Residu	0.019	.1	8/28/2003
September2003	001	Chlorine, Total Residu	0.019	.2	9/5/2003
September2003	001	Chlorine, Total Residu	0.019	.1	9/11/2003
September2003	001	Chlorine, Total Residu	0.019	.1	9/18/2003
September2003	001	Chlorine, Total Residu	0.019	.1	9/25/2003
October 2003	001	Chlorine, Total Residu	0.019	.2	10/3/2003
October 2003	001	Chlorine, Total Residu	0.019	.1	10/9/2003
October 2003	001	Chlorine, Total Residu	0.019	.1	10/16/2003
October 2003	001	Chlorine, Total Residu	0.019	.1	10/23/2003
October 2003	001	Chlorine, Total Residu	0.019	.1	10/30/2003
May 2004	001	Chlorine, Total Residu	0.019	.2	5/7/2004
May 2004	001	Chlorine, Total Residu	0.019	.1	5/13/2004
May 2004	001	Chlorine, Total Residu	0.019	.1	5/20/2004
May 2004	001	Chlorine, Total Residu	0.019	.2	5/27/2004
June 2004	001	Chlorine, Total Residu	0.019	.1	6/4/2004
June 2004	001	Chlorine, Total Residu	0.019	.1	6/10/2004
June 2004	001	Chlorine, Total Residu	0.019	.2	6/17/2004
June 2004	001	Chlorine, Total Residu	0.019	.1	6/24/2004
July 2004	001	Chlorine, Total Residu	0.019	.1	7/1/2004
July 2004	001	Chlorine, Total Residu	0.019	.1	7/8/2004
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September2004	001	Chlorine, Total Residu	0.019	.1	9/17/2004
September2004	001	Chlorine, Total Residu	0.019	.1	9/23/2004
October 2004	001	Chlorine, Total Residu	0.019	.1	10/1/2004
May 2005	001	Chlorine, Total Residu	0.019	.1	5/6/2005
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July 2005	001	Chlorine, Total Residu	0.019	.1	7/25/2005
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July 2005	001	Chlorine, Total Residu	0.019	.1	7/28/2005
July 2005	001	Chlorine, Total Residu	0.019	.1	7/29/2005
August 2005	001	Chlorine, Total Residu	0.019	.1	8/1/2005
August 2005	001	Chlorine, Total Residu	0.019	.1	8/2/2005
August 2005	001	Chlorine, Total Residu	0.019	.1	8/3/2005
August 2005	001	Chlorine, Total Residu	0.019	.1	8/4/2005
August 2005	001	Chlorine, Total Residu	0.019	.1	8/5/2005
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September2005	001	Chlorine, Total Residu	0.019	.14	9/12/2005
September2005	001	Chlorine, Total Residu	0.019	.1	9/13/2005
September2005	001	Chlorine, Total Residu	0.019	.1	9/14/2005
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September2005	001	Chlorine, Total Residu	0.019	.2	9/16/2005
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October 2005	001	Chlorine, Total Residu	0.019	.05	10/17/2005
October 2005	001	Chlorine, Total Residu	0.019	.05	10/18/2005
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June 2007	001	Chlorine, Total Residu	0.019	.1	6/28/2007
June 2007	001	Chlorine, Total Residu	0.019	.09	6/29/2007
February 2003	001	Nitrogen, Ammonia (NH3	13	15.1	2/8/2003
April 2003	001	Nitrogen, Ammonia (NH3	13	20.3	4/8/2003
April 2003	001	Nitrogen, Ammonia (NH3	1.9	2.3819	4/8/2003
January 2005	001	Total Suspended Solids	1.73	1.75056	1/1/2005
January 2005	001	Total Suspended Solids	2.60	6.74109	1/1/2005
May 2006	001	Total Suspended Solids	2.60	3.49734	5/15/2006