



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

July 15, 2009

RE: WAYNE COUNTY
WOOSTER TWP.
SUNSET TRAILER PARK
NPDES # 3PV00109

NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. William Wyatt
1235 TR 353
Polk, OH 44866

Dear Mr. Wyatt:

On June 30, 2009, this writer conducted an unannounced inspection of the sewage treatment plant in operation at Sunset Trailer Park. The intent of the inspection was to evaluate operations and maintenance of the wastewater treatment plant. In addition to the inspection report, let this letter also serve as a Notice of Violation for reasons stated below:

At the time of the inspection, the condition of the treatment system was unsatisfactory with the following deficiencies noted during the inspection:

- 1) The color of the aeration tank was a dark brown and the blower was in operation. The sludge return line was not in operation. The air bubbles were not surfacing in the tank. This indicates there is not enough air getting into the tank and there may be an imbalance in the air line balancing valves or a possible diffuser clog. The clarifier had large amounts of floating sludge on the surface and heavy solids were flowing over the weir. The sludge blanket in the clarifier was visible to the surface of the clarifier in some areas of the tank. The influent baffle of the clarifier was full of solids and the skimmer was buried in solids. The excessive amount of solids in the clarifier is not acceptable and it must be cleaned immediately.
- 2) The control box to the dosing station was rusted, not weather tight and was unplugged at the time of the inspection. The condition of the control box is unacceptable. The box must be replaced with a new control system that includes a high water alarm, an automatic switch to alternate the lead and lag pumps, hour meters to accurately monitor flow, and a weather tight box encasement.



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The dosing station was full of solids at the time of the inspection (see photo below). This is unsatisfactory and indicates the solids from the clarifier are carrying over into the pump station. The pumps were buried in solids and therefore it is not known if two pumps are operable to transfer wastewater to the sand filters. The solids must be pumped out of the dosing station immediately and the pumps must be tested and any nonfunctioning pumps must be replaced.



- 3) The sand filters had vegetation growing in the media and the impervious PVC lining was separating from the sidewalls. The sidewalls were repaired and resealed but do not appear to have been replaced as was previously recommended by this office in a letter dated January 23, 2007 (copy enclosed). Since the last inspection by this office on December 28, 2006, the splitter box was replaced but the underdrains and pipe drainage between the sand filters and the chlorinator was not confirmed. In addition it appears the filter media was not replaced since the last inspection by this office. The filtering media on the surface of the sand filters appeared to be more like gravel than a filter sand. The media should be removed and replaced with Ohio EPA approved filter sand having an effective size of 0.4 mm to 1.0 mm with a uniformity coefficient of not greater than 3.0.

In addition, based on the condition of the dosing station, it is possible the sand filters are not receiving any wastewater.

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- 4) The disinfection system did not appear to be receiving any flow at the time of the inspection. There were leaves accumulated within the tank and the influent to the tank was dry which indicates there was little or no flow coming from the sand filters. This office received a letter from you on May 7, 2007 which stated you planned on making sure the pipe between the sand filter and the disinfection tank was draining properly. To date, this office has not received confirmation that this work was completed.

Based on the information collected during the inspection, it is not clear how wastewater is getting to the disinfection tank from the dosing tank or the filters. This office previously requested you to provide a written explanation describing how and where the compliance samples are collected. Given the condition of the disinfection tank, sand filters and dosing tank, the sampling procedures for this system are questionable. This office is once again requesting you to provide a written explanation to this office which describes how and where the compliance samples are collected.

- 5) The compliance with your National Pollutant Discharge Elimination System (NPDES) permit was reviewed as part of the inspection. The compliance review was conducted for the period of January 1, 2007 through June 1, 2009. A summary of the wastewater treatment plant discharge violations for the period of January 1, 2007 to June 1, 2009 has been attached to this letter. Be advised that violations of the NPDES permit (see attachment) constitute violations of the Ohio Revised Code(ORC) 6111.07 and are subject to fines and other enforcement actions as identified in ORC 6111.09 and/or 6111.99. Also, such violations are subject to fines of \$10,000 per day per violation.
- 6) Your NPDES permit contains a compliance schedule that required you to submit detail plans for wastewater treatment plant upgrades. To date, these detail plans have not been submitted and therefore your compliance schedule remains incomplete. The required upgrades included at a minimum, replacing the control box for the dosing station, replacing the existing sand filters with new filters, adding a second blower to the aeration tank, establishing a functional disinfection system, and installing a sampling structure downstream of the disinfection tank. According to the compliance schedule of your NPDES permit (copy enclosed), the detail plans for the upgraded wastewater treatment plant were required to be submitted by March 1, 2008 and the upgrades were required to be installed by March 1, 2009. You are currently in noncompliance with your NPDES permit for failing to comply with your compliance schedule.

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Four sets of detail plans of the wastewater treatment system must be prepared and stamped by a Professional Engineer and submitted to this office for review. The detail plans 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 the inspection during construction. In accordance with the Ohio Revised Code (ORC) 6111.44, you must receive formal approval from the Director's Office prior to construction. The Plan Approval Procedures can be found on our Web site at www.epa.state.oh.us/dsw/pti/HowToObtainPTI.html.

The inspection revealed the operations and maintenance of the wastewater treatment plant to be in unsatisfactory condition. Due to the continued noncompliance of this facility, this office is recommending enforcement action be taken against the Sunset Trailer Park. The enforcement action will include but is not limited to the following:

- Violations of the NPDES permit limits;
- Violations of the Compliance Schedule in Part 1.C of the NPDES permit; and
- Unsatisfactory operations and maintenance of the NPDES permit which is a violation of Part III, Item 3.A. of the NPDES permit.

Required Action

The following is a list of actions that must be taken in order for the Sunset Trailer Park to return to compliance:

- 1) Remove solids from the clarifier and dosing tank. Once the solids are removed from the dosing tank, test the pumps to ensure both pumps are operating. Replace any pump that is not operating.
- 2) Replace the control box for the dosing system with one that is weather tight, and contains a high water alarm, an automatic system to alternate the lead and lag pumps, and hour meters to accurately monitor flow.
- 3) Replace the sand filter media with new filter media having an effective size of 0.4 mm to 1.0 mm with a uniformity coefficient of not greater than 3.0. Reconnect the piping between the sand filters and the disinfection system. Test the piping between the filters and the disinfection system to ensure it is draining properly and submit the follow up report to this office.
- 4) Clean the bottom of the disinfection of tank of all debris and ensure it is draining properly.

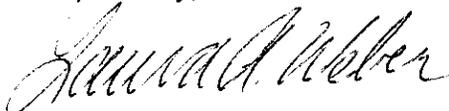
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- 5) Within 30 days, submit to this office a response which includes an explanation of the location for collecting samples and all reports from the analytical lab.
- 6) It is our recommendation that you begin working on submitting a Permit to Install (PTI) to our office for wastewater plant upgrades. Please respond within 30 days from the date of this letter with a workplan which addresses the wastewater treatment plant upgrades. The workplan must include a timeframe to get the PTI submitted. The workplan must evaluate all aspects of the treatment system including but not limited to:
 - a) Blowers, piping, aerators and air supply lines, and all return lines, air lifts, pumps;
 - b) The dosing pumps and transfer lines;
 - c) The water tight design of the dosing system wet well;
 - d) Replacement of the sand filters, media and collection piping to transport the wastewater to the disinfection system; and
 - e) The disinfection system. The design of the disinfection system should be such that the wastewater effluent should flow out the effluent pipe.

The general plan must include an implementation schedule.

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: violation list

pc: Wayne County Health Dept., Janet Rittenhouse
Rick Jackson, Smithville Western, Ltd.

File: Semi-Public/Wayne/WoosterTwp./Sunset MHP

Discharge Violations:

<u>Reporting Period</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
March 2007	00530	Total Suspended Solids	30DConc	12	17.	3/1/2007
March 2007	80082	CBOD 5 day	30DConc	10	11.	3/1/2007
August 2007	50060	Chlorine, Total Residu	1D Conc	0.038	.42	8/24/2007
June 2007	00530	Total Suspended Solids	30DConc	12	98.	6/1/2007
June 2007	50060	Chlorine, Total Residu	1D Conc	0.038	.5	6/29/2007

Frequency Violations:

<u>Reporting Period</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Sample Frequency</u>	<u>Expected</u>	<u>Reported</u>	<u>Violation Date</u>
June 2007	00083	Color, Severity	1/Week	1	0	06/15/2007
June 2007	01330	Odor, Severity	1/Week	1	0	06/15/2007
June 2007	01350	Turbidity, Severity	1/Week	1	0	06/15/2007

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PS Form 3800, August 2006 See Reverse for Instructions