

**Environmental  
Protection Agency**

Governor  
Lt. Governor  
Director

October 6, 2011

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

**NOTICE OF VIOLATIONS**

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

Dear Mr. Funk:

On September 29, 2011, this writer met with you to conduct a compliance evaluation inspection of the wastewater treatment plant serving the Glen Ridge Mobile Home Park (MHP). Also present during the inspection were Rick Jackson, Justin Singleton and Joyce Kick. Below are the findings and recommendations from the inspection:

At the time of the inspection, the wastewater treatment plant (WWTP) was producing what appeared to be a satisfactory quality effluent.

**INSPECTION**

- 1) It is understood the trash trap is pumped out about four times a year. At the time of the inspection, the trash trap was full of solids and needs to be pumped out. You indicated that a cleanout would be scheduled. Please provide written notification to this office within 21 days from the date of this letter that the trash trap has been pumped out.
- 2) The flow equalization tank was in good condition and provided with adequate aeration.
- 3) During the inspection, the mixed liquor within the aeration 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. It must be cleaned up immediately. Anytime there is a spill or overflow of sewage, Part III of your National Pollutant Discharge Elimination System (NPDES) permit requires you to report the overflow to this office within 24 hours of discovery at 1-800-

282-9378. Additionally, the operator should determine what is causing this problem and fix the aeration tank to eliminate the splashing. Please provide written notification to this office within 21 days from the date of this letter summarizing the adjustment made to the aeration tank to prevent raw sewage from splashing up and out of the tank.

- 4) The aeration tank contained mixed liquor that was a light brown color. One of the sludge return lines was not operating. The second aeration tank was not provided with adequate air circulation due to a malfunctioning air diffuser. Please provide written notification to this office within 21 days from the date of this letter summarizing the repairs completed on the aeration tank diffuser and sludge return line.
- 5) The clarifier was full of solids. The influent baffle was packed with solids as well and the weir had solids accumulation present. The skimmer could not be located due to the presence of solids on the surface of the tank. Additionally, there was vegetation growing on top of the solids. The clarifier needs to be pumped out, walls scrapped down, weir cleaned, skimmer cleaned, and all lines checked. Please provide written notification and pictures to this office within 21 day from the date of this letter showing that the clarifier has been cleaned and any necessary repairs completed.
- 6) The upflow fixed media appeared to contain murky water with floating solids. There was some solids accumulation on the weirs. Additionally, the media filter plate was broken and could be seen floating. The upflow fixed media filter needs to be cleaned out and repaired. Please provide written notification and pictures to this office within 21 day from the date of this letter summarizing the repairs that have been made to the upflow fixed media filter.
- 7) 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.
- 8) The distribution box to the surface sand filters was broken. There were visible cracks and evidence that effluent was leaking from the box. This box needs to be replaced. Please provide written notification to this office within 21 days from the date of this letter summarizing how and when the distribution box will be replaced.
- 9) The west surface sand filter bed was in poor condition overloaded with sludge and sediment. The east surface sand filter bed was in operation and was

overloaded with sludge and vegetation. The surface sand filter beds must be cleaned and raked. If media must be excavated out to remove the sludge and sediment laden media, it must be replaced with Ohio EPA approved media. This removed sand media and debris must not be dumped on your property. The removed material is considered a solid waste and must be disposed of at an Ohio EPA licensed solid waste facility. Please provide written notification and pictures to this office within 21 days showing the surface sand filter beds have been cleaned and raked.

- 10) The UV system was in operation at the time of the inspection.
- 11) The flows recorded on the Electronic Discharge Monitoring Report (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.
- 12) A review of your Discharge Monitoring Reports (DMRs) covering the period January 2010 through August 2011 revealed the following effluent violations:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2010	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.9	2/1/2010
March 2010	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.8	3/1/2010
March 2010	001	Nitrogen, Ammonia (NH3)	30D Qty	0.16	.31643	3/1/2010
March 2010	001	Nitrogen, Ammonia (NH3)	7D Qty	0.24	.31643	3/22/2010
August 2010	001	Fecal Coliform	30D Conc	1000	2400.	8/1/2010
August 2010	001	Fecal Coliform	7D Conc	2000	2400.	8/22/2010
January 2011	001	Total Suspended Solids	30D Conc	12	24.	1/1/2011
January 2011	001	Total Suspended Solids	30D Qty	0.64	1.18092	1/1/2011
January 2011	001	CBOD 5 day	30D Conc	10	15.	1/1/2011
January 2011	001	CBOD 5 day	30D Qty	0.53	.73808	1/1/2011
January 2011	001	Total Suspended Solids	7D Conc	18	24.	1/22/2011
January 2011	001	Total Suspended Solids	7D Qty	0.95	1.18092	1/22/2011
February 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	7.2	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3)	30D Qty	0.16	.59954	2/1/2011
February 2011	001	CBOD 5 day	30D Conc	10	14.	2/1/2011
February 2011	001	CBOD 5 day	30D Qty	0.53	1.16578	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	7.2	2/22/2011
February 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.24	.59954	2/22/2011
February 2011	001	CBOD 5 day	7D Qty	0.80	1.16578	2/22/2011
June 2011	001	Fecal Coliform	30D Conc	1000	6000.	6/1/2011
June 2011	001	Fecal Coliform	7D Conc	2000	6000.	6/22/2011

**NPDES PERMIT**

Your NPDES permit contains a compliance schedule. The effective date of the permit was June 1, 2010. The following is a breakdown summary of the compliance schedule and compliance dates.

1. The Glen Ridge MHP shall attain compliance with the final effluent permit limitations for phosphorus within 18 months from the effective date of this permit. Detailed plans were to be submitted within 8 months from the effective date of the permit. Construction was to commence with 15 months from the date of the permit and completed within 17 months from the effective date of the permit. To date this compliance milestone has not been completed.
2. 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 responsibilities 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 within 12 months from the effective date of the permit. The report was due June 1, 2011. To date this compliance milestone has not been completed.
3. The Glen Ridge 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." The study was to be initiated with six (6) months of the effective date of the permit and the final report submitted within 18 months from the effective date of the permit. The final report is due November 1, 2011. To date this study has not been initiated.
4. The Glen Ridge MHP shall install a continuous flow meter at the wastewater treatment plant no later than three (3) months from the effective date of this permit. To date this meter has not been installed.

The Glen Ridge MHP is in violation of their NPDES permit for failing to comply with the compliance schedule. These are significant violations of your NPDES permit. To prevent further enforcement action to be taken by this office; you must complete the NPDES schedule of compliance. Please provide a written notification to this office

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within 21 days of this letter outlining a timeline when the events stated in the NPDES permit will be completed. Failure to comply with the conditions of your NPDES permit will result in this matter being referred to our legal section for an enforcement action.

Please submit all the requested material in the timeframes outlined above. If you have any questions or comments regarding this letter, please contact this office at (330) 63-1255.

Respectfully,



Todd Surrena  
Engineering Geologist  
Division of Surface Water

TMS/cs

cc: Wayne County Health Department  
Mr. Rick Jackson, Smithville Western Care  
Mr. Justin Singleton

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