



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 15, 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 October 5, 2011, Ohio EPA sent you a Notice of Violations (NOV) letter. To date, you have completed some work on your waste water treatment plant; however, there are still outstanding issues. Your facility is still in violation of the following:

INSPECTION

- 1) 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.
- 2) 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.
- 3) 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.
- 4) 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.

On November 11, 2011, you sent Ohio EPA pictures of the sand filter beds. The pictures showed that some work had been done on the beds but vegetation still remained on the beds. Please provide written notification and photos to this office within 21 from the date of this letter, showing all vegetation has been removed from the sand filter beds.

- 5) 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.

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 eight 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.

On November 1, 2011, Ohio EPA received a permit-to-install (PTI) for a phosphorus removal system. The PTI is currently under review. You are still in violation of this compliance milestone since the phosphorus removal system was to be operating by October 2011.

- 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 "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. Please provide a compliance schedule to this office within 21 days from the date of this letter, stating when the CPE will be completed and submitted to Ohio EPA.
- 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

months of the effective date of the permit and the final report submitted within 18 months from the effective date of the permit.

On November 1, 2011, Ohio EPA received a report titled "Sanitary Sewer Evaluation Study for the Glen Ridge Mobile Home Park." The report contained the results of a smoke test performed on the sanitary sewer collection system. Based on that report the following items need to be completed:

- A. Only 30% of the collection system was smoked tested. The entire collection system needs to be evaluated. Please provide a compliance schedule to this office within 21 days from the date of this letter, stating when the remaining collection system will be evaluated.
 - B. The smoke testing identified faulty areas of the collection system including a direct connection to a storm sewer catch basin. Please provide a compliance schedule to this office, within 21 days from the date of this letter, stating when the faulty sewer lines will be repaired and when the connection to the storm sewer will be removed.
- 4) The Glen Ridge MHP shall install a continuous flow meter at the wastewater treatment plant no later than three months from the effective date of this permit. To date this meter has not been installed. Please provide a compliance schedule to this office within 21 days from the date of this letter, stating when the continuous flow meter will be installed.

The Glen Ridge MHP is in violation of their NPDES permit for failing to comply with your 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 recommendations as stated in the NPDES schedule of compliance. Please provide a written notification to this office within 21 days of this letter, addressing all the above violations. 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 request material in the timeframes outlined above. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1255.

Respectfully,



Todd Surrena
Engineering Geologist
Division of Surface Water

TMS/cs

cc: Wayne County Health Department
Mr. Justin Singleton, PO Box 670236, Northfield, Ohio 44067
File: Semi-Public/Wayne/E Union Twp/GlenRidgeMHP(Orrville Inn)