



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: **Notice of Violation**
Ashland County
Mohican River Estates MHP
NPDES Permit

March 14, 2012

Mr. Daniel Inks
9 Corporate Center
Broadview Heights, Ohio 44147

Dear Mr. Inks:

On February 28, 2012, an inspection was made of the waste water treatment facilities serving the Mohican River Estates Mobile Home Park (MHP) located at 3055 County Road 3175, Loudonville, Ashland County. At the time of the inspection, the treatment system was operating normally.

The operator's log was reviewed during the inspection. The log was found to be deficient in the information that is being recorded. I have enclosed an excerpt from the Ohio Administrative Code section that deals with the operator log and the information it needs to contain. The log at Mohican River Estates should include a column to record the daily flow metering readings on the sand filter dosing pumps used to calculate the daily effluent flow as well as the other items mentioned in the rule.

We are in receipt of your discharge monitoring reports covering the months of August 2011 through January 2012 for the referenced facility. A review of the reports revealed two **violations** of the limits contained in your NPDES permit. These **violations** were for exceeding the CBOD limits in the December 2011 sample.

Your NPDES permit contains a compliance schedule to install flow equalization facilities. According to this schedule, construction was to have begun no later than June 1, 2011, and completed by December 1, 2011. You are currently in **violation** of the compliance schedule contained in your NPDES permit. We have received notice from you that the project has been bid, awarded, and tanks have been ordered. If the construction of the equipment is not completed prior to June 1, 2012, our office will refer this case for escalated enforcement action seeking a financial penalty. As stated in your NPDES permit, you are required to notify our office in writing within seven days of both initiating and completing construction.

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You are reminded of the determination that the filter media within the sand beds will need to be replaced. The stand pipes within the beds shall be removed and sealed where they meet the under drain collectors. The impermeable liner should also be checked for integrity. Our office will need to be onsite when this work is conducted. Seventy-hours (72) hours of notification shall be given to our office before this particular work takes place.

If you have any questions, please call me at 419-373-3070.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter Ariss".

Walter Ariss, P.E.
Environmental Specialist II
Division of Surface Water

/jlm

Enclosures

pc: Lyn Makeever, Makeever and Associates Inc.

ec: Inspection Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2P400028

Facility Name Melvin Over Estates Expiration Date 11/30/2013

Facility Address 3055 OR 3175 Date 2/28/12 Time 10:30 am pm

City Londonville County Ashland Township _____

Name and Address of Owner I & R properties

Person Contacted _____ Owner Phone _____

Flow: Design 20,000 GPD Present 12,000 - 74,000 GPD (metered - estimated)

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 40° sun

OEPA Personnel Walter Aciss District NWDO

1. Plant Effluent - Mark Severity No. - several fish seen floating near shore - natural pond

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None	<input checked="" type="checkbox"/>	Clear	<input checked="" type="checkbox"/>	None	<input checked="" type="checkbox"/>	Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: Black Fork Melvin

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None	<input checked="" type="checkbox"/>	Clear	<input checked="" type="checkbox"/>	None	<input checked="" type="checkbox"/>	Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has _____ excellent good _____ fair _____ poor operation
 b. Plant has _____ excellent good _____ fair _____ poor maintenance
 c. Sand filters have _____ excellent _____ good fair _____ poor maintenance

d. Not operating at expected efficiency due to:

- (1) hydraulic overload
 (2) _____ organic/ solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) _____

Disinfection: (Required May 1 thru Oct.31.)	
IN	OUT
_____	<input checked="" type="checkbox"/>
_____	<input checked="" type="checkbox"/>
_____	_____
	Chlorination Tablets
	Dechlorination Tablets
	U.V.

Yes No

4. Compliance with NPDES Permit

Periodic Violations Y N Parameters: CRD

Chronic Violations compliance schedule

5. Adequate plant safety

6. Operation and Maintenance Service Name Lyn Makeever

Frequency of Visits ?

Facility Name: Abraham River Estates

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	X	Trash Trap	Pumping Frequency: ?
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment	2	Plant Timer <u>Y</u> X N Motor/ Blower Unit <i>running</i>	Cycle Time: <i>one off, one running</i>
Secondary Treatment	X	Aeration Tank	Color: <i>good color + roll</i> Adequate Aeration: <u>Y</u> X N
Final Settling	2	Clarifier	<i>good clarity</i>
	2	Sludge Return	In <u>X</u> Out
	X	Surface Skimmer	In <u>X</u> Out
		Fixed Media Clarifier	
Tertiary Treatment	4	Surface Sand Filter <i>3 beds clean with sludge piled in corners</i>	<i>1 bed has thick layer of sludge - in use</i>
		Polishing Pond	
		Other	
Disinfection	X	Chlorine Tube Feeder	<i>out</i>
	X	Dechlorination Tube Feeder	<i>out</i>
		Ultraviolet (UV)	
Flow Metering	X	Elapsed Pump Time	<i>on sand filter dosing</i>
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
	X	Sand Filter Effluent Dosing	<i>okay</i>
Sludge Handling	X	Aerated Storage Tank	<i>tanks about 1/2 full</i>
		Sludge Drying Bed	
Sludge Disposal	X	Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment	X	Post Aeration	<i>or</i>
		Spray Irrigation	
		Other	

3745-7-09 Recordkeeping requirements and responsibilities of a certified operator.

- (A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, distribution system, water treatment plant within a public water system, sewerage system, treatment works, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.
- (1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
 - (2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.
 - (3) At a minimum, the following information shall be recorded:
 - (a) Identification of the public water system, sewerage system, or treatment works;
 - (b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
 - (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;
 - (d) Results of tests performed and samples taken, unless documented on a laboratory sheet;
 - (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and
 - (f) Identification of the persons making entries.
 - (4) The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.
- (B) A certified operator shall:
- (1) Perform their duties in a responsible and professional manner consistent with standard operating procedures and best management practices;
 - (2) Operate and maintain public water systems, sewerage systems, treatment works, and appurtenances so as not to endanger the health or safety of persons working