



**Environmental  
Protection Agency**

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

Re: Seneca County  
Poplar Village MHP  
NPDES #2PY00032

June 8, 2012

Mr. Robert Merchant  
HAP III, LP  
12400 State Highway 71-W #350-245  
Austin, Texas 78738

Dear Mr. Merchant:

On March 29, 2012, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted of the Poplar Village Mobile Home Park (MHP) wastewater treatment plant (WWTP). The MHP is located at 12400 West Axline Street, just southeast of Fostoria, Loudon Township. On site at the time of inspection were park managers Ginger Bennett and Randy Ralph, Christina Douglas, Uni-Tech Environmental Services, Inc., along with two employees (Tony & Jim) of the MHP. Observations and recommendations noted during the inspection are as follows:

1. The trash trap should be monitored for solids accumulation and pumped out as needed. It was previously indicated that solids build up in the trash trap have caused sewer line backups.
2. The access area above the trash trap/lift station contained an accumulation of solids on top of the tank cover and high water marks were observed on the concrete block walls. Excess flows during rain events due to inflow and infiltration (I/I) would cause flooding and overflow of these tanks. The lift station pumps are not designed to handle the extreme flows resulting from I/I.
3. The aeration tank was operational and appeared to have an adequate rate of aeration.
4. The two sludge returns were operating.
5. There is no operational skimmer in the clarifier.
6. The clarifier tank does not have an adequate baffle to keep the bulking sludge that was observed from discharging over the clarifier discharge weir.
7. Randy indicated that the clarifier hopper walls are scraped down once or twice per month. It was advised that the clarifier hopper walls should be scraped down once per day to increase the solids returned. This will also prevent sludge from bulking and floating to the surface of the tank.

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8. It was indicated that the flow was switched to the west sand filter bed the day before the inspection. Both filter beds were covered with solids and need to be cleaned. It was noted that high flows during rain events (I/I) washes solids out of the clarifier and onto the sand filters.
9. Four stand pipes are located at the south end of the sand filter beds. These pipes are not approved and should be removed from the filters.
10. Disinfection must be provided from May through October.
11. The flow from the sand filters into the chlorine contact tank appeared to be clear, but accumulated solids in the tank were observed.
12. It was indicated that some sewer line camera work was performed last fall, and that the sewer lines would need to be "jetted" before additional camera work could be done.
13. The data being reported on the discharge monitoring reports (DMRs) indicates the same flow every day, for a month at a time. As previously indicated, flows are to be reported daily as required by the NPDES permit. Daily flows were reported for March 2012 only, but again in April 2012, the same flow was reported every day of the month.
14. Pictures taken at the time of the inspection are enclosed.

**NPDES Permit Compliance Schedule (2PY00032\*BD):**

As indicated in our previous letters (dated 6/22/09, 6/28/10 and 06/23/2012), the NPDES permit for this facility includes the following compliance schedule items that were to have been submitted:

- *6/1/2007 - Submit Permit to Install (PTI) for disinfection facilities (Event Code 01799). Attain operational level of the treatment works to meet the final effluent chlorine limitation not later than May 1, 2007.*

**A PTI (#818963) was submitted and approved (8/31/2011) for the construction of an effluent lift station and disinfection (chlorination/de-chlorination) facilities. An email dated April 18, 2012, from Lyn Makeever, Makeever & Associates, Inc, indicated that the construction of these facilities had been initiated, with anticipated completion by the following week.**

- *5/1/2008 – Submit a sewer system evaluation survey and sanitary sewer I/I analysis. Items to be included in the I/I analysis are specified in the permit.*

**Not received.**

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- *11/1/2008 – Submit detail plans and a PTI for sewer system improvements necessary to implement the recommendations of the study to reduce the volume of I/I entering the collection system.*

**Not received.**

A review of your discharge monitoring reports (DMRs) has also been conducted. A list of permit violations (May 2011 thru April 2012) is enclosed.

Please inform this office in writing, within 10 days, as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations.

Failure to comply with the NPDES permit and properly operate and maintain the WWTP can be cause for escalated enforcement action that may include penalties. If immediate progress is not made to eliminate the effluent limit and compliance schedule violations, we will have no choice but to recommend that the Director pursue enforcement action.

If there are any questions, please contact me at 419-373-3014.

Yours truly,

  
Mary Beth Cohen  
Division of Surface Water

/jlm

Enclosures

pc: Seneca County Health Department  
Park Manager, Poplar Village MHP  
Christina Douglas, Uni-Tech Environmental Services, Inc.

ec: Inspection Tracking

**Poplar Village MHP**  
**2PY00032 (001) Effluent Violations**  
**May 2011 thru April 2012**

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	00530	Total Suspended Solids	30D Conc	12	13.	5/1/2011
May 2011	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.1	5/1/2011
May 2011	00610	Nitrogen, Ammonia (NH3	30D Qty	0.07	.09936	5/1/2011
May 2011	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	2.1	5/27/2011
May 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.9	5/27/2011
June 2011	00530	Total Suspended Solids	30D Conc	12	28.	6/1/2011
June 2011	00530	Total Suspended Solids	30D Qty	0.9	1.32475	6/1/2011
June 2011	31616	Fecal Coliform	30D Conc	1000	11000.	6/1/2011
June 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.9	6/15/2011
June 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.7	6/22/2011
June 2011	00530	Total Suspended Solids	1D Conc	18	28.	6/29/2011
June 2011	00530	Total Suspended Solids	1D Qty	1.3	1.32475	6/29/2011
June 2011	31616	Fecal Coliform	1D Conc	2000	11000.	6/29/2011
June 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.	6/29/2011
July 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.7	7/6/2011
July 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.5	7/13/2011
July 2011	00300	Dissolved Oxygen	1D Conc	6.0	5.5	7/20/2011
September 2011	00530	Total Suspended Solids	30D Conc	12	51.	9/1/2011
September 2011	00530	Total Suspended Solids	30D Qty	0.9	2.41294	9/1/2011
September 2011	00530	Total Suspended Solids	1D Conc	18	51.	9/29/2011
September 2011	00530	Total Suspended Solids	1D Qty	1.3	2.41294	9/29/2011
January 2012	00530	Total Suspended Solids	30D Conc	12	18.	1/1/2012

**Poplar Village MHP, Seneca Co.**

taken by M.B.Cohen, 03/29/2011

Looking southwest at clarifier and aeration tank



Influent trash trap & lift station



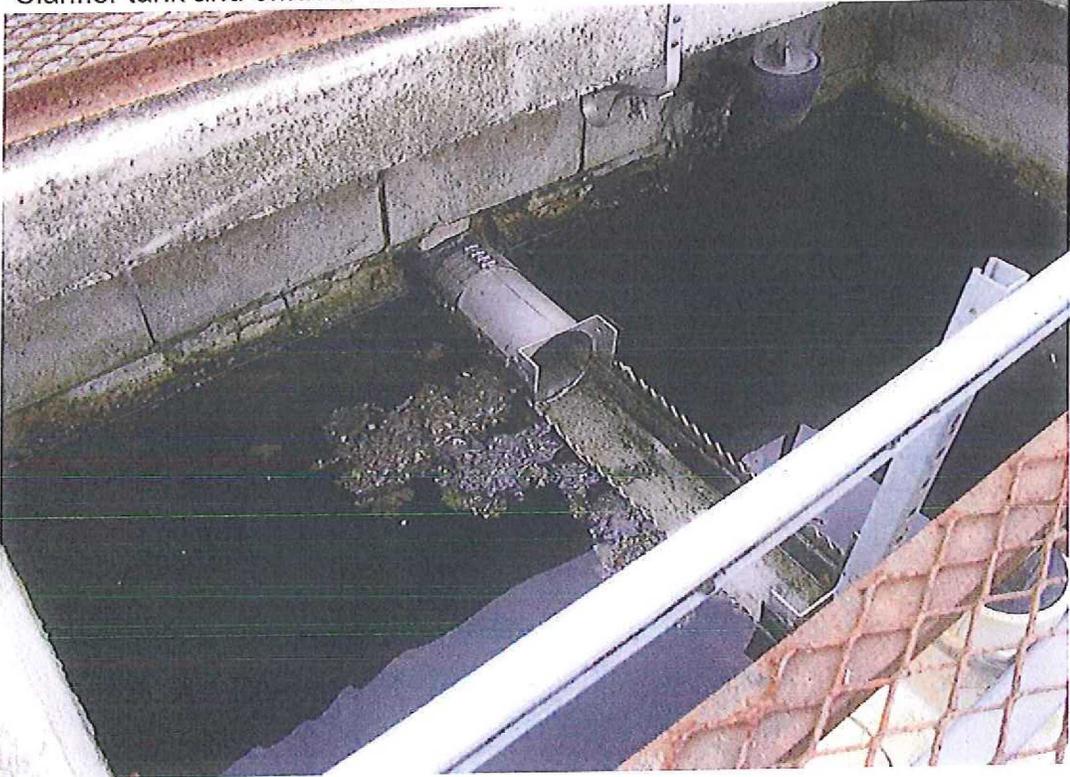




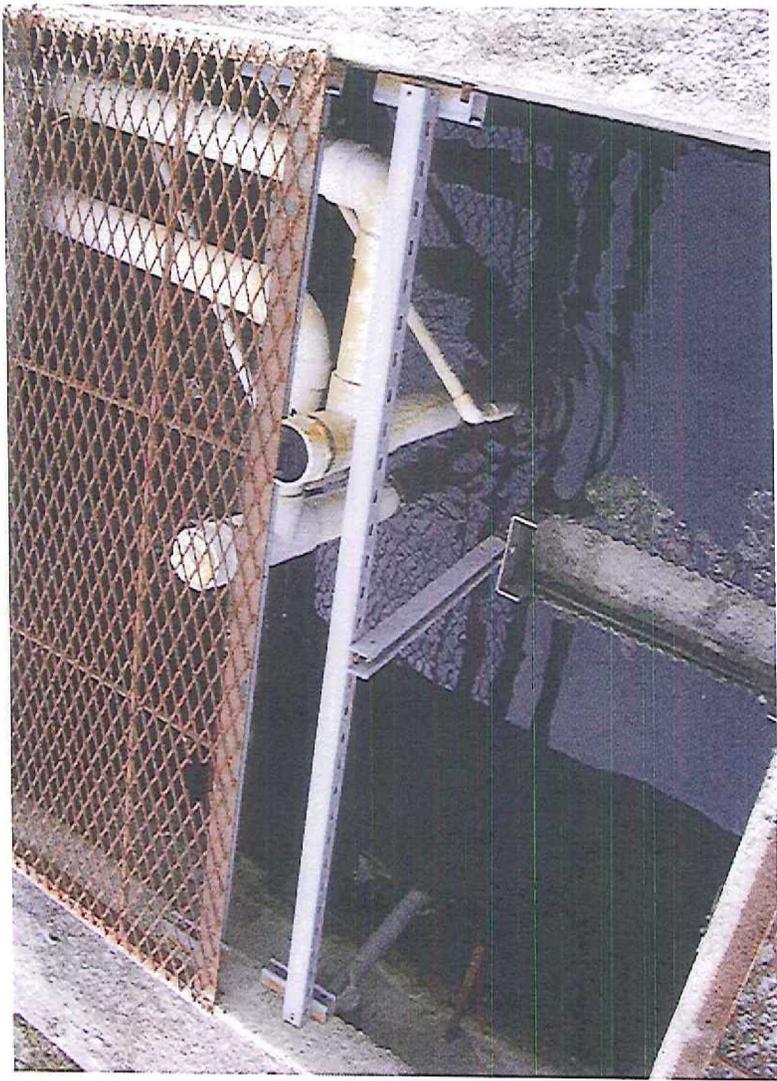
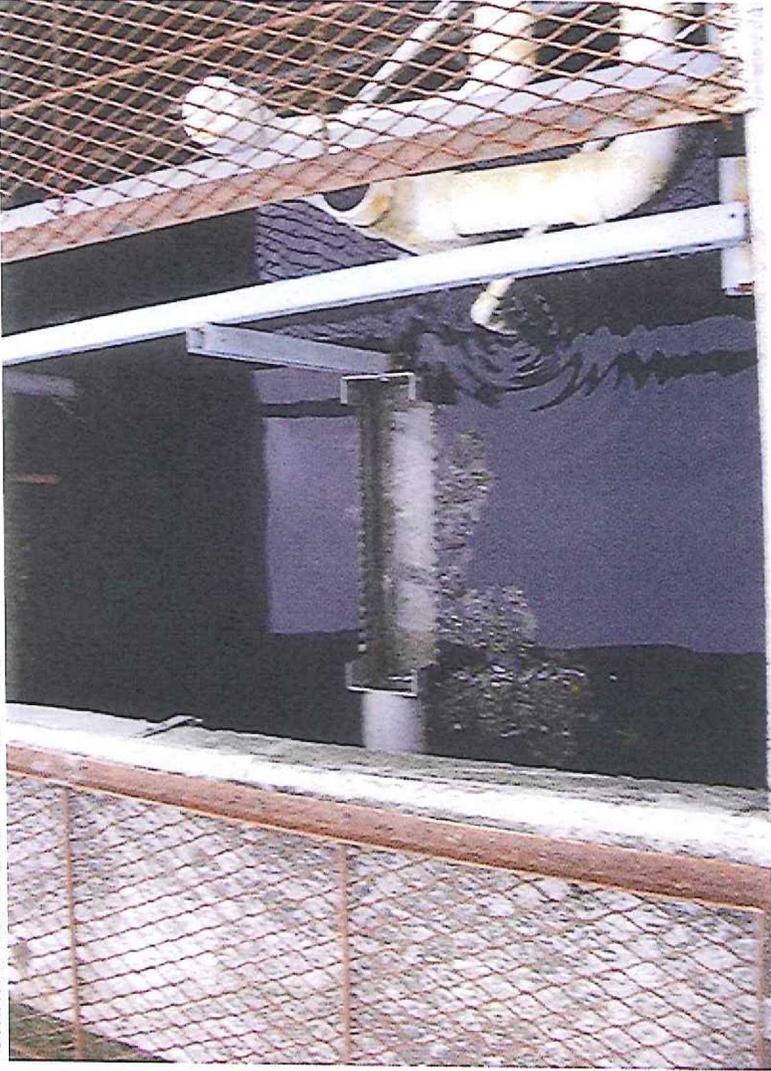


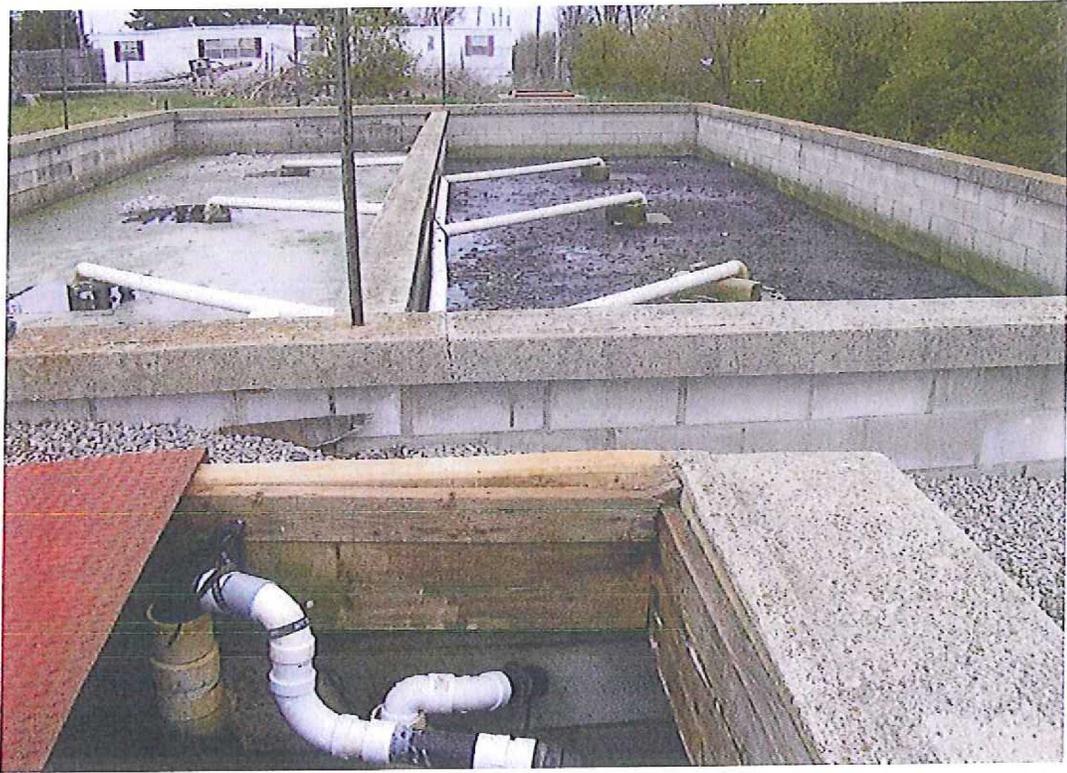


Clarifier tank and effluent weir



Poplar Village MHP, Seneca Co.  
Clarifier tank and effluent weir











Chlorine tank



