



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 18, 2012

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 June 13, 2012, this writer conducted a compliance evaluation inspection of the wastewater treatment plant serving the Glen Ridge Mobile Home Park (MHP). Below are the findings and recommendations from the inspection:

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

**INSPECTION**

- 1) The flow equalization tank was in good condition and provided with adequate aeration.
- 2) The aeration tank contained mixed liquor that was a brown color. It appeared that there was adequate air circulation in the tanks.
- 3) The surface sand filter beds were in good condition.
- 4) The UV system was in operation at the time of the inspection.
- 5) A review of your electronic Discharge Monitoring Reports (eDMRs) covering the period September 2011 through May 2012 revealed the following effluent violations:

Permit No	Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00092*CD	September 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.6	9/1/2011
3PV00092*CD	September 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.053	.16351	9/1/2011
3PV00092*CD	September 2011	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	3.6	9/22/2011
3PV00092*CD	September 2011	001	Nitrogen, Ammonia (NH3	7D Qty	0.0795	.16351	9/22/2011
3PV00092*CD	March 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.38	3/1/2012
3PV00092*CD	March 2012	001	Phosphorus, Total (P)	30D Qty	0.053	.05746	3/1/2012
3PV00092*CD	April 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.02	4/1/2012
3PV00092*CD	May 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.1	5/1/2012
3PV00092*CD	May 2012	001	Phosphorus, Total (P)	30D Qty	0.053	.05454	5/1/2012

**NPDES PERMIT**

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.

A letter was sent to Ohio EPA on January 16, 2012, that the ferric chloride pump system for phosphorus removal was installed and operating. According to the eDMR review, your facility is still not meeting the phosphorus limit. Please submit in writing your plans to evaluate your chemical feed system and attain compliance with the final effluent permit limits for phosphorus.

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 responsibility 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.

A letter was sent to Ohio EPA on December 2, 2011, stating that the CPE would be completed by July 2012. 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 within 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.

A letter was sent to Ohio EPA on December 2, 2011, stating that smoke testing of the collection system was being completed and all repair work would be completed by June 2012. Once the repairs are completed, photos and documentation of the repairs would be sent to Ohio EPA. To date, Ohio EPA has not received confirmation of the completed repair work.

4. The Glen Ridge MHP shall install a continuous flow meter at the wastewater treatment plant no later than 3 months from the effective date of this permit.

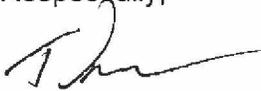
A letter was sent to Ohio EPA on December 2, 2011, stating that a flow meter would be installed within 24 months. This time frame is outside of the compliance schedule set forth in your NPDES permit. Ohio EPA recommends installing the flow meter sooner than the proposed 24 months to return to compliance with your NPDES permit.

MR. THOMAS FUNK  
JUNE 18, 2012  
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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. 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 M. Surrena  
Engineering Geologist  
Division of Surface Water

TMS:bo

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

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