



**Environmental
Protection Agency**

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

Re: Seneca County
Poplar Village MHP
NPDES #2PY00032

September 19, 2012

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

Dear Mr. Merchant:

On September 6, 2012, an inspection of the wastewater treatment facility that serves Poplar Village Mobile Home Park (MHP) was made. Mr. Carl "Tony" Zitter, Park Manager, was present and provided information regarding the plant's operation. The MHP is located at 12400 West Axline Street, just southeast of Fostoria, Loudon Township.

Comments, observations and recommendations noted during the wastewater treatment Plant (WWTP) inspection are as follows:

1. Excess flow during rain events due to inflow and infiltration (I/I) causes flooding and overflow of the trash trap and lift station structure. The lift station pumps are not designed to handle the extreme flows resulting from I/I.
2. The aeration tank was operational and appeared to have an adequate rate of aeration.
3. It was indicated that one of the two sludge returns was operating, but the return discharge is under the surface water and the return flow was not visible. This return line needs to be elevated just above the surface so that it is visible for inspection, to see that it is operating and the condition of return flow.
4. There is no skimmer in the clarifier. It was indicated that one of the sludge return lines may be modified into a skimmer.
5. The clarifier tank does not have an adequate baffle to keep the ongoing bulking sludge from discharging over the clarifier discharge weir. An effluent baffle should be provided.
6. 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. It is suggested that the "scrub brush" that is being used now be replaced with a wider "squeegee" for scraping down the hopper walls.
7. It was noted that high flows during rain events due to I/I continues to wash solids out of the clarifier onto the sand filters.

8. The west sand filter was in use at the time of inspection. This filter bed had at least four inches of standing water, and was covered with a floating scum layer. The scum layer has remained all summer and appeared the same as was observed during the previous inspection. It was indicated that the west filter bed never completely dries out, and, therefore, has not been adequately cleaned. Further efforts to remove the solids and scum layer and/or replace the filter sand are needed prior to the winter months.

The east sand filter contained dried solids that need to be removed as soon as possible to make this bed available for use. It was indicated that the ongoing wash through of solids from the plant to the filters causes this bed to plug with solids after minimal use.

Both sand filter beds contained weed growth that needs to be removed. It is recommended that the weed and grass growing in the filters be manually removed as needed to prevent further growth.

A portion of the sand (possibly several inches deep) may need to be excavated to remove the nuisance weed growth and persistent scum layer. Please note that 18 inches of approved filter sand is to be maintained on the filter beds. Filter sand shall be clean and washed with an effective size between 0.4 and 1.0 mm, with a uniformity coefficient not greater than 3.0. It is also recommended that when filter media is being replaced, that the under-drains be inspected, repaired and/or cleaned as needed.

Approved filter sand is addressed in the following document: *Sewage: Collection, Treatment & Disposal Where Public Sewers Are Not Available* (aka Green Book). The Surface Sand Filters-Appendix (page 38) from the Green Book is enclosed. This document is available on line at the following web site: <http://epa.ohio.gov/portals/35/documents/greenbook.pdf>.

As previously noted, the four stand pipes located at the south end of the sand filter beds are not approved and should be removed from the filters.

9. Chlorination and dechlorination were provided at the time of the inspection. The water in the disinfection tank was somewhat turbid with a grey/green cast. It was noted that the (pre-disinfection) new lift station pumps have "burned up" and had to be replaced on several occasions in the past few months.
10. **Flows are to be reported daily as required by the National Pollutant Discharge Elimination System (NPDES) permit.** The data being reported on the discharge monitoring reports (DMRs) continues to indicate 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.** Run time meters are available on the chlorine lift station and daily readings are being taken. Copies of the daily logs that include run time meter readings were provided to me for the months of June, July and August. The flows for these months need to be calculated (converted from run time based on pumping rates), and submitted in the DMR's. Revised eDMR's should be submitted as necessary.
11. There is a three unit apartment building located at the northeast corner of Crystal Lane and Antwerp Street. It appears that this building (sewer) is connected to a septic tank located just east of the building. At this time, the sewer from the apartment building should be connected to the MHP's sanitary sewer, and the septic tank should be properly abandoned.

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12. Pictures taken at the time of the inspection are enclosed.

Operator Log Requirements

Ohio Administrative Code (OAC) Rule 3745-7-09 includes the recordkeeping requirements and responsibilities of a certified operator. The log book must be an up to date record of wastewater system operations and maintenance, which contains at a minimum, the following information:

- Identification of the sewerage system or treatment works;
- Date and times of arrival and departure for the operator of record;
- Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage received and/or effluent produced;
- Results of tests performed and samples taken, unless documented on a laboratory bench sheet;
- 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 conveyed, effluent produced;
- Identification of the persons making entries.

The records must be kept up to date, contain a minimum of three months' data at all times, and be maintained on site for at least three years.

OAC Chapter 3745-7-09: Operator Certification for Public Water Systems and Wastewater Treatment Works is available at: <http://www.epa.state.oh.us/ddagw/rules.aspx>.

NPDES Permit Compliance Schedule (2PY00032*BD):

As indicated in our previous letters (dated 6/22/09, 6/28/10, 06/23/2011, and 06/08/2012), the NPDES permit for this facility includes the following compliance schedule items that were to have been submitted:

- *6/1/2007 - Submit a Permit to Install (PTI) for disinfection facilities (Event Code 01799). Attain operational level of the treatment works to meet the final effluent chlorine limitation no later than May 1, 2007.*

PTI # 818963 was submitted and approved August 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.

The installation was completed and in use as of May 1, 2012.

- *5/1/2008 – Submit a sewer system evaluation survey and sanitary sewer infiltration/inflow (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 Infiltration/Inflow entering the collection system.*

Not received.

No apparent progress is being made to eliminate the compliance schedule violations; therefore, we have no choice but to recommend that the Director pursue enforcement action to achieve compliance.

Please inform this office in writing within 10 days as to the reasons for the above referenced violations, a description of the actions to be taken, along with submittal of a fixed date schedule addressing the above compliance schedule violation.

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: Tracking

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PY00032	OH0126497	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
9/6/2012	10:30 AM	12:35 PM	Yes	

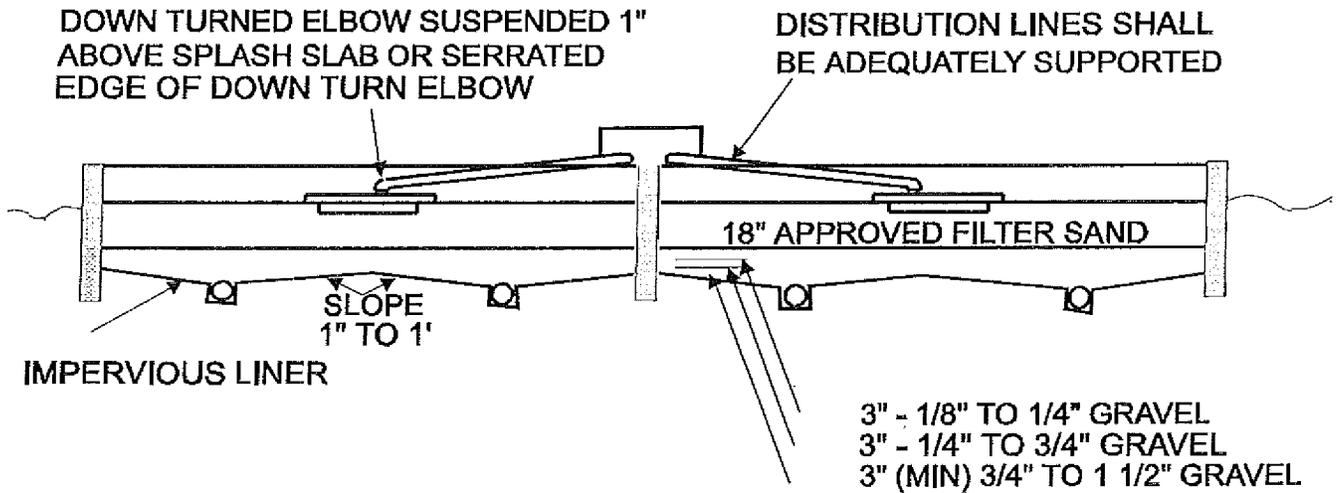
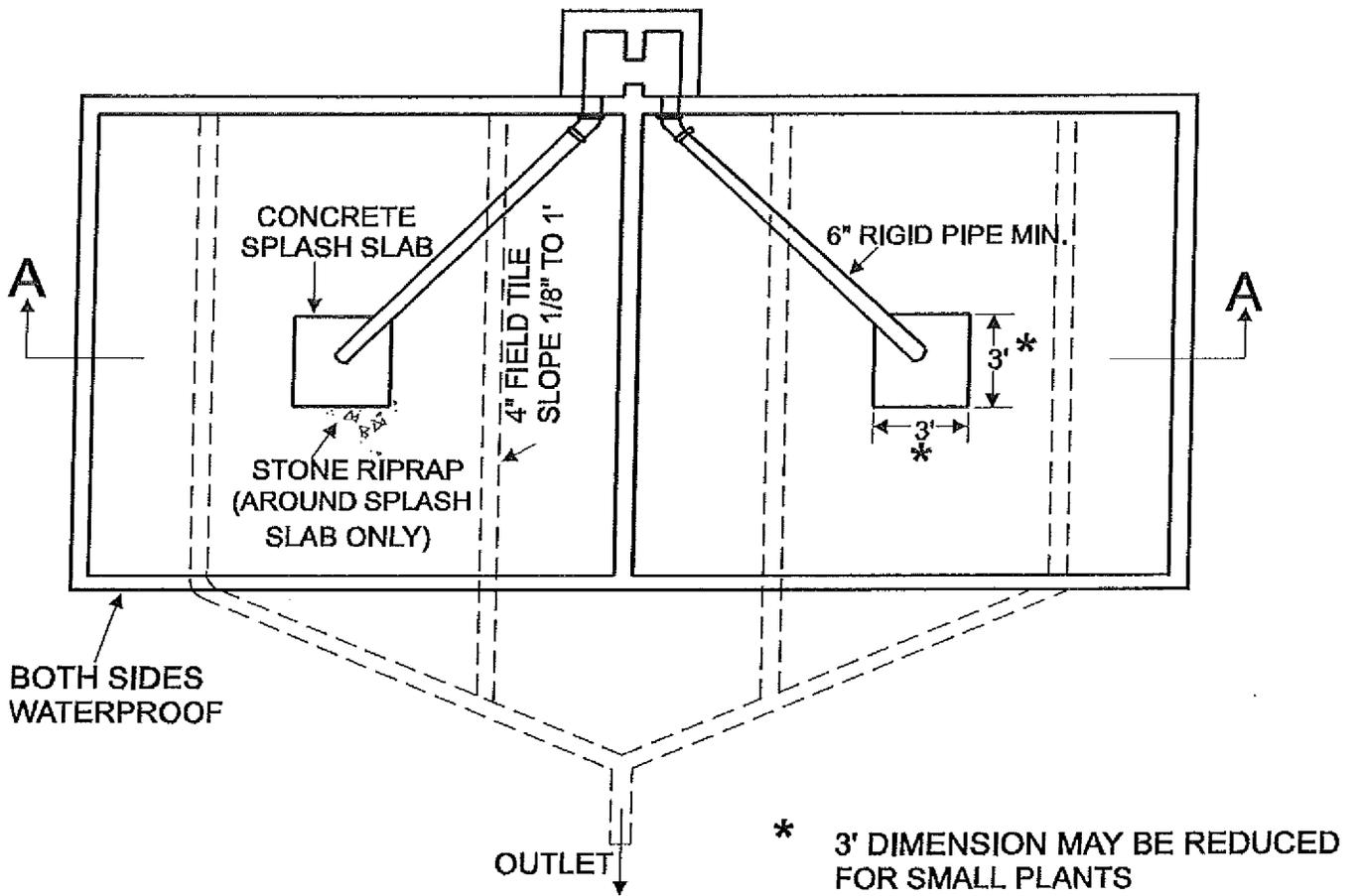
SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Poplar Village MHP 12400 W. Axline St Fostoria, OH 44830	5/1/2007
	Permit Expiration Date
	4/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Carl "Tony" Zitter, Manager	419-559-4696
Name and Title of Responsible Official	Phone Number
HAP III, LP Russell Hinds, Owner Robert Merchant, contact	512-330-9437 419- 215-1536

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Compliance schedule not met
U	Operations & Maintenance	Ongoing operational issues
M	Facility Site Review	
N	Collection System	Needs to be evaluated as per the NPDES schd
U	Flow Measurement	Not reporting daily flow values on eDMR's
M	Receiving Waters	
N	Laboratory	

Comments: See letter

Signatures			
	9/17/12		9/17/12
Mary Beth Cohen, Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	Date	Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office	Date

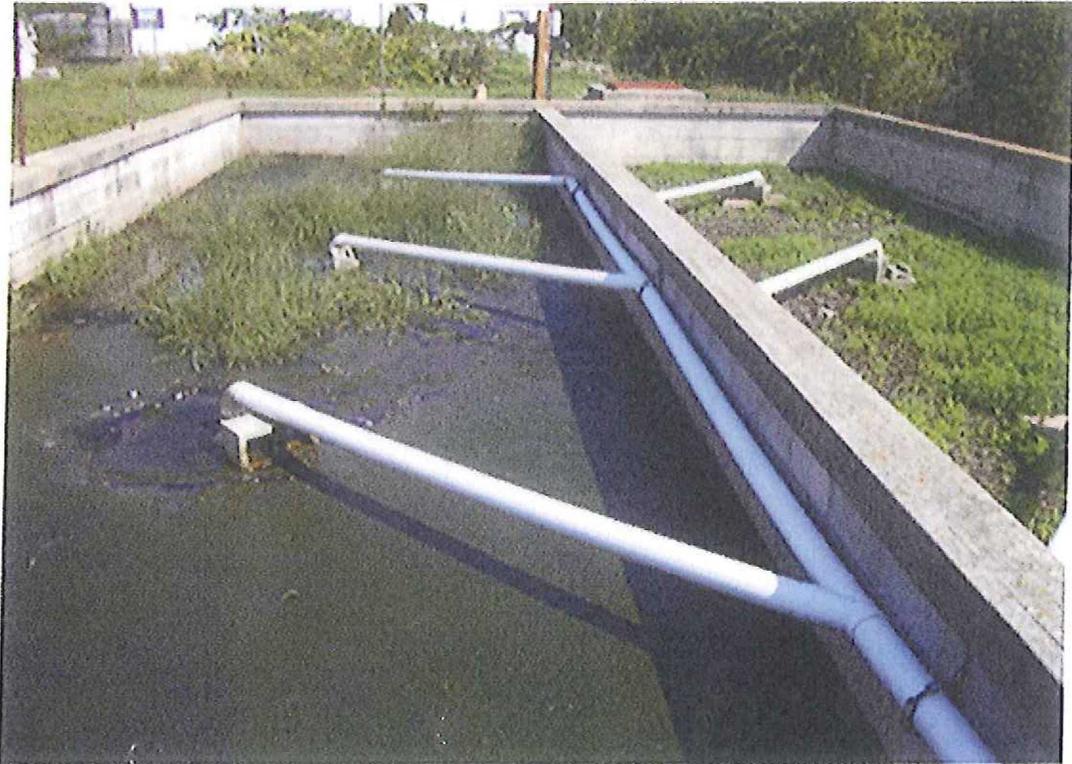
APPENDIX



SECTION A-A

SURFACE SAND FILTERS

Surface sand filters (↑ N)



Standing water w/ scum layer on west filter (↑S)



Surface sand filters (↑ N)



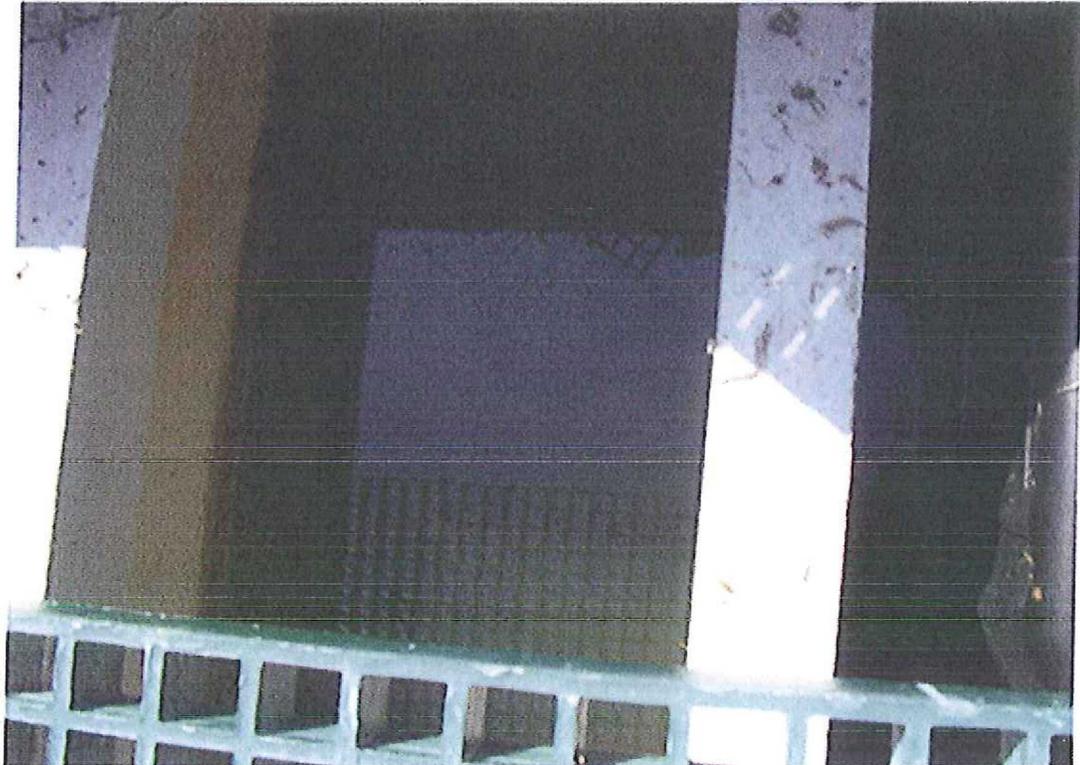
Standing water w/ scum layer on west filter



Lift station – to disinfection



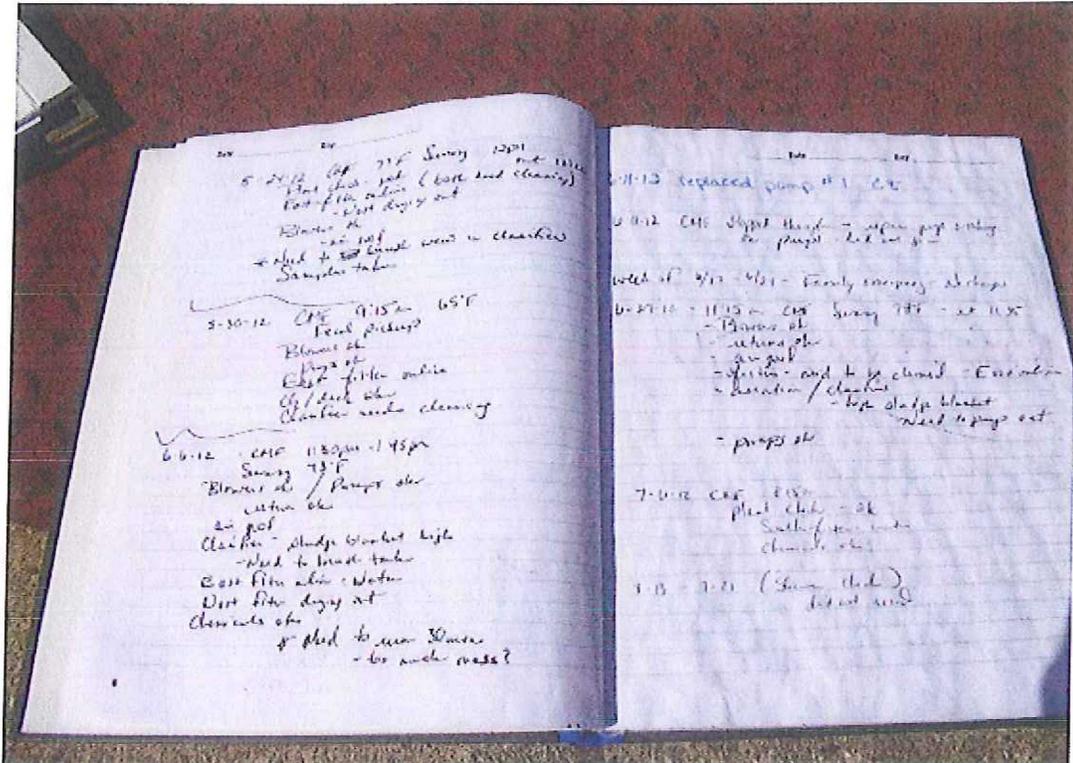
Chlorine contact tank (contents is turbid with grey/green cast)



Final outfall 001 - discharge to ditch (↑E)



On site log book



Septic tank east of apartment building / building at NE corner of MHP (↑W)

