



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

October 30, 2012

RE: **WHISPERING WILLOW MHC
NPDES PERMIT NO. 3PV00084
HARPERSFIELD TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION**

Mr. Steve Ureel, General Partner
4 MHC Associates Limited Partnership
Whispering Willow Mobile Home Community
1120 North Main Street
Rochester, MI 48307

Dear Mr. Ureel:

On October 29, 2012, a site inspection was conducted at the above referenced facility at 4250 State Route 307, Harpersfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and Marlene Knopsnider represented 4 MHC Associates Limited Partnership (4MHC), d.b.a. Whispering Willow Mobile Home Community. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspections were conducted on May 11, 2011, June 22, 2011, and November 1, 2011.

The collection system consists of a gravity system located east and northeast of the waste water treatment plant (WWTP). The treatment system consists of a trash trap, flow equalization basin, extended aeration tanks, clarification, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the sludge tanks when needed to another POTW. The facility discharges to the Grand River adjacent to the southwest side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations and Notations

Following are observations and notations made during the inspection.

1. The plant is operated by Marlene Knopsnider and Dustin Lewis of Lewis Wastewater Services on behalf of 4 MHC Associates Limited Partnership (4MHC), d.b.a. Whispering Willow Mobile Home Community.
2. Log books, and a copy of NPDES permit, and the operation and maintenance manual are maintained at the site and were available for inspection. The log book is compliant with OAC 3745-7-09. A copy of the contract was not available, and Ms. Knopsnider indicated that although requested there is currently no written contract with Lewis Wastewater Services/Clean Streams. **A copy of the operator contract must be available for inspection.**

3. The overall condition of the treatment plant during this inspection was satisfactory, except that the plant was experiencing severe hydraulic overloading. Ms. Knopsnider indicated that this was due largely to surface water running onto the plant due to the elevation of the trash trap, although some may be coming from the collection system.
4. The trash trap was functioning properly during the inspection. Collected trash was containerized for disposal at a solid waste landfill. Trash and sludge is removed from the plant every three months. Sludge and trash was removed from the plant a few weeks ago.
5. The equalization tank blowers and alarms were cycled and found in operating condition. The alarm was shut off, as the tank was in high flow mode due to the excessive inflow.
6. The content of the aeration tank had a medium brown color, earthy odor, and good mixing. Sludge returns were a medium brown color with minimal foaming. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The sludge holding tank was noted as cleaned and operating properly at the time of the inspection.
8. The surface of the clarifier was clear and both the effluent weir and skimmer were functioning properly at the time of this inspection. Effluent weirs and channels appear reasonably clean.
9. Surface sand dosing tank and siphon were found in operating condition.
10. The south bed was flooded and within a few inches of overtopping. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. If the bed overtops, the overflow must be reported. The wastewater percolated freely through the sand indicating that the beds were not clogged. The north bed was noted as reasonably clean.
11. The chlorination and dechlorination tank is stocked with appropriate chemicals and was reasonably clean.
12. The final effluent was discharging and was clear. The final discharge at the Grand River was observed as clear.
13. Marlene Knopsnider maintains the facility in conjunction with Mr. Dustin Lewis of Clean Stream, Inc. Samples are collected by Lewis Wastewater Services, who perform on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity. Ms. Knopsnider records daily readings of flow and turbidity.
14. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
15. Clean Streams submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of 4MHC.

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NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period from June 1, 2011 through October 1, 2012, indicates the following apparent noncompliance of the terms and conditions of your NPDES permit:

Limit Violations

Effluent limit violations noted for the time period reviewed include:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	9.0	9.1	7/21/2011

Pursuant to Part III, Item 12 of your NPDES permit, you were to notify Ohio EPA of noncompliance. A written explanation as to why the event occurred must be provided, along with measures to ensure that it will not be repeated. Noncompliance notification forms may be found at [epa.ohio.gov/portals/35/permits/24-hour reporting Form4498 bypasses.doc](http://epa.ohio.gov/portals/35/permits/24-hour%20reporting%20Form4498%20bypasses.doc).

Reporting Violations

No reporting code or reporting frequency violations are noted for the time period reviewed.

Compliance Schedule

Your current NPDES permit does not contain a compliance schedule. Please be aware that the new permit that will commence on January 1, 2013, will contain a compliance schedule for bacteria monitoring, requiring you to monitor for both fecal coliform and E. coli for the 2013 disinfection season, with a status report due in the fall of 2013.

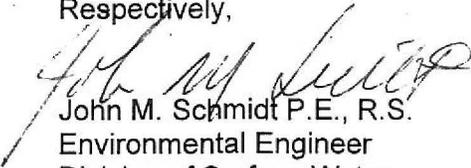
Other Violations

1. Investigate Inflow and Infiltration: The plant was observed as hydraulically overloaded due to receiving excessive inflow. The source of the excessive inflow must be investigated and corrected immediately. Care must be taken to divert surface waters away from process tanks so that tanks do not receive unnecessary rain water and snow melt which adversely affect treatment processes. Consideration may also be given to raising the elevation of the tanks via tank extensions. A surface berm and swale that curves around the facility should be installed to convey storm water runoff away from the WWTP. The existing collection system should also be investigated for excessive inflow and infiltration from damaged collection piping, storm water connections, etc. **Please provide a schedule for conducting this inflow and infiltration investigation within 30 days of the date of this letter.**

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If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cl

cc: Dustin Lewis, Lewis Wastewater Management
Marlene Knopsnider, Lewis Wastewater Management
File: SP/Ashtabula/Harpersfield Twp/Whispering Willow MHC (3PV00084)