



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

Re: Notice of Violation
Defiance County
Park Place
NPDES Permit 2PY00065/OH0138134
Reconnaissance Inspection

December 13, 2012

Mr. Bill and Ms. Rhonda Voirol
7640 State Route 15
P.O. Box 673
Defiance, Ohio 43512

Dear Mr. and Ms. Voirol:

On October 15, 2012, a Reconnaissance Inspection was conducted at the wastewater treatment plant (WWTP) serving Park Place Mobile Home Park (MHP). During the inspection, none of your site representatives or operators was present. The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the operation and maintenance of the plant. On December 7, 2012, I discussed with Mr. Tom Horn, Operator of Record for the Park Place WWTP, the operation and maintenance issues at the plant that caused violation of your NPDES permit limits.

On October 4, 2011, you submitted detail plans for wastewater treatment system improvements, which included the demolition of the plant building, relocation of the sand filter beds, installation of a UV disinfection system, and installation of a post aeration system in the final manhole prior to discharge. From approximately June to August of the past summer, you completed construction on the wastewater treatment system improvements.

During my October 15, 2012, inspection, although construction had been completed, the ground surface had not been stabilized. Permanent seeding and mulching is required before construction activity is completed. If seasonal conditions prohibit establishment of vegetative cover, other means, such as mulching and matting, must be used and maintained until more permanent methods can be implemented.

The effluent to the stream was clear and odorless. The aeration tanks and the settling tank do not have grates for safety. The sand filters were maintained and no vegetative growth was observed. However, there were higher than anticipated volumes of sludge present on the surface of the east sand filter. During my December 7, 2012, phone conversation with

Mr. Bill and Ms. Rhonda Voirol
December 13, 2012
Page Two

Mr. Horn, he attributed the higher volume of biosolids on the sand filter to the lack of aeration control in the plant during August of 2012. The aerator would run too long, which promoted floating sludge that carried over from the settling tanks to the sand filters. Since the violations in August, the electrical controls and the blower were replaced. Mr. Horn stated that the high volume of sludge on the sand filters that remained during my October 15, 2012, inspection was caused by the August issues with over aeration. Mr. Horn also stated that standard operating practices (SOPs) are being developed with the completion of the plant upgrades.

The non-compliance notification reports in August were completed by Mr. Tom Roth, who is also an operator for the plant. Mr. Roth cited in his report that high Inflow and Infiltration (I&I) had caused the NPDES permit limit violations. Although high I&I can carry larger volumes of biosolids to the sand filters, I&I could not have been the cause since the weather was so dry in August. Mr. Horn stated that an error in the pump hour counter had been discovered and high flows were not an issue in August and the eDMRs have since been corrected with the lower flow volumes. However, the enclosed table for the 10 highest flows to the plant since May of 2011 documents that the plant continues to experience extremely high flows of up to 12 times the average flow rate. If this data is accurate, the plant will likely continue to have issues until the I&I is removed from the sewer collection system at the facility.

As shown in the enclosed missing compliance milestone table, you have completed all the milestones except final compliance with effluent limits, which had a deadline of April 1, 2012. You are in violation of your NPDES permit schedule of compliance Part I. C. items A, B, C and D because you failed to complete the required items prior to the deadlines in your NPDES permit. A review of the discharge monitoring reports that are submitted under the NPDES permit for the Park Place WWTP shows that this facility is in significant non-compliance (SNC) for the Ammonia at Outfall Number 001. I am enclosing a list of violations for this facility for the period of May 2011 through December 1, 2012. Since the plant continues to be in violation of your effluent limits as detailed in the enclosed Limit Violation table, you have not met the final schedule of compliance milestone E. As a result, you are also in violation of your NPDES permit schedule of compliance Part I. C. item E.

A facility becomes SNC when it exceeds the effluent limit for four or more months in two consecutive quarters exceeds the effluent limit significantly in any two months in two consecutive quarters, or fails to meet requirements outlined in an NPDES permit compliance schedule.

Achieving compliance with Ohio's environmental laws is a primary focus of Ohio EPA in order to reduce risks to public health and welfare.

As I discussed with Tom Horn during a December 7, 2012, phone conversation, there have been recent operational challenges with startup of the new plant that have prompted additional upgrades to the plant such as the replacement of the electrical board and blower. It is the goal when developing SOPs that their implementation will prevent the plant from experiencing NPDES permit limit violations. Unfortunately, these SOPs will not be able to prevent NPDES

Mr. Bill and Ms. Rhonda Voirol
December 13, 2012
Page Three

permit violations if the I&I at your plant proves as severe as the eDMR data suggests (see enclosed 10 highest flow table).

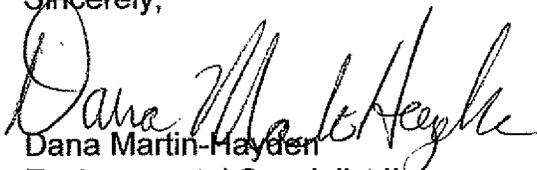
Before we initiate enforcement action, we would like to work with you to achieve satisfactory progress to bring this facility back into compliance. Within three weeks of the date of this letter, please submit, in writing, the actions that you propose to undertake or have undertaken in order to return your facility into compliance with your NPDES permit. You will also need to give us a time table for these actions. These actions and time table may also be submitted by email to me at dana.martin-hayden@epa.state.oh.us.

This report must include an update regarding the success of the SOPs developed to enable the plant to meet NPDES permit limits. This report must also include a preliminary estimate of the I&I reaching the plant. In addition, the report must include a schedule of compliance providing dates for identifying the sources of I&I in the collection system, and elimination of the I&I in the collection system.

If there are no short term measures that can be taken to return to compliance, Ohio EPA will have no choice but to recommend escalated enforcement action to achieve compliance. If you wish to meet with us to discuss this matter, please contact me at 419-373-3016 within 10 days of receiving this letter in order to set up a meeting.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 419-373-3067 or e-mail at Dana.Martin-Hayden@epa.state.oh.us.

Sincerely,



Dana Martin-Hayden
Environmental Specialist II
Compliance and Enforcement Unit
Division of Surface Water
Northwest District Office

/jlm

Enclosures

ec: Dana Martin-Hayden
Tracking

Compliance Data for Park Place between 5/1/2011 to 12/1/2012

Summary

Permit Effluent Limit Violations: 10
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: * 0
 Compliance Schedule Violations: 8

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2012	001	Total Suspended Solids	30D Conc	12.0	15.	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	10.9	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.0474	.04951	6/1/2012
June 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	10.9	6/22/2012
August 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	8.63	8/1/2012
August 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.0474	.09799	8/1/2012
August 2012	001	E. coli	30D Conc	206	322.738	8/1/2012
August 2012	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	16.8	8/15/2012
August 2012	001	Nitrogen, Ammonia (NH3	7D Qty	0.071	.19076	8/15/2012
August 2012	001	E. coli	7D Conc	464	480.	8/22/2012

Missing Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
April 2011	10/4/2011	1299	Construction	Final Plan Submitted
October 2011	6/1/2012	3099	Construction	Begin Construction
April 2012	8/1/2012	4599	Construction	End Construction
April 2012		5699	Construction	Final Compliance w/ Eff Limits

*The facility has 1 missing data report.

Station	Required Report Period	DMR Received
001	November 2012	No

Flow Data for Park Place between 5/1/2011 and 12/1/2012

	Date	Flows (GPD)
Ten Highest Flows	11/28/2011	60480
	11/29/2011	60480
	11/30/2011	60480
	11/22/2011	37440
	11/23/2011	37440
	11/24/2011	37440
	10/18/2011	31500
	10/19/2011	31500
	9/27/2011	22320
	9/28/2011	22320
Average Flow Rate		4916

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PY00065	OH0138134	RI	S	
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
10/15/2012	2:20	2:50	Yes	Yes

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Park Place 7640 State Route 15 Defiance, Ohio 43512	3/1/2009
	Permit Expiration Date
	2/28/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Mr. Tom Horn and Mr. Tom Roth, IFM, Operator of Record	419-748-7438
Name and Title of Responsible Official	Phone Number
Mr. and Mrs. Rhonda Voirol	419-399-7660

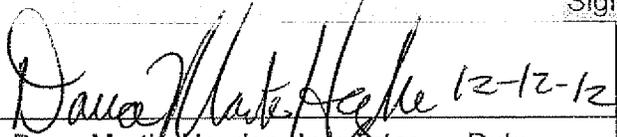
SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

U	NPDES Compliance	Numerous permit violations and on SNC list
M	Operations & Maintenance	
U	Facility Site Review	No grates on tanks and no erosion controls
U	Collection System	Possible high I&I as documented by eDMR data.
M	Flow Measurement	Issues with pump counter in future
S	Receiving Waters	
N	Laboratory	

Comments:

Signatures

 12-12-12	 12/12/12
Dana Martin-Hayden, Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	Thomas Poffenberger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office

OHIO ENVIRONMENTAL PROTECTION AGENCY
 OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PY00065#AD

Facility Name Park Place WWTP Expiration Date 2/2014
 Facility Address 7640 SR 15 Date 10/15/12 Time 2:20 am/pm (am)
 City Defiance County Defiance Township Nobel
 Name and Address of Owner Bill & Rhonda Voigt 419-399-7663
 Person Contacted Kasey Carlisle IFM operator Owner Phone 419-439-5753
 Flow: Design 12,500 GPD Present TBD GPD (metered - estimated)
 Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 70° Sunny
 OEPA Personnel Dana Martin-Hayden District NWDO

1. Plant Effluent - Mark Severity No.

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: Unnamed Tributary to the Tiffin

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
 _____ Chlorination Tablets NOT
 _____ Dechlorination Tablets ABLE
 _____ U.V. TO LIFT LID

TO OBSERVE

Yes No

4. _____ Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____

Chronic Violations _____

5. _____ Adequate plant safety

6. _____ Operation and Maintenance Service Name Mr. Tom Horn, IFM
Mr. Tom Roth, IFM

Frequency of Visits _____

Facility Name: Park Place WWTP

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	3	Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
Aeration Equipment	1	Plant Timer <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Cycle Time:
		Motor/ Blower Unit	
Secondary Treatment	2	Aeration Tank	Color.: brown/grey aerated Adequate Aeration: Y <input type="checkbox"/> N <input type="checkbox"/>
Final Settling	1	Clarifier	
		Sludge Return	In _____ Out _____ can't see from fence
		Surface Skimmer	In _____ Out _____ " "
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	Some sludge on west bed only 2 weeks
		Polishing Pond	
Disinfection	1	Contact Tank	
		Chlorine Tube Feeder	
		Dechlorination Tube Feeder	
		Ultraviolet (UV)	can't open top
Flow Metering		Elapsed Pump Time	
		Recorder. (continuous total)	
Pumps	1	Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling		Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal		Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment		Post Aeration	
		Spray Irrigation	
		Other	ground not seeded Need of erosion control