



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

Re: Ashland County
Mohican River Estates MHP
NPDES Permit

December 28, 2012

Mr. Daniel Inks
9 Corporate Center
Broadview Heights, Ohio 44147

Dear Mr. Inks:

On November 16, 2012, an inspection was made of the wastewater treatment facilities serving the Mohican River Estates Mobile Home Park (MHP) located at 3055 County Road 3175, Loudonville, Ashland County. At the time of the inspection, the treatment system was operating normally. A few concerns with the treatment plant operations were noted.

The chlorine tablet feeder tubes were both half full of tablets. Chlorination is not required from November 1 through April 31. The tablets should be pulled out of the feeder tubes. No dechlorination tablets were in either of the tablet feeder tubes of the dechlor unit. This means that excess chlorine was being discharged to the receiving stream. This would constitute a violation of your National Pollutant Discharge Elimination System (NPDES) permit.

It was observed that the new flow EQ tanks, the pumps within the tanks, and the piping were installed differently than shown on the approved drawings. Our office notified you in our previous inspection report that it would be necessary for you to submit a copy of an as-built drawing stamped by the original engineering firm, Makeever and Associates, showing the locations and elevations of the equipment as it was installed. This as-built drawing should have been submitted to our office no later than June 30, 2012. An as-built drawing must be submitted within 21 days of receipt of this letter, to prevent our office from escalating action against you.

The operator's log was reviewed during the inspection. The log was found to be deficient in the information that is being recorded. The park manager is collecting the required information on two different sheets of paper, one kept at the wastewater treatment plant (WWTP) and one kept at the drinking water well house. This information should all be collected on one sheet that is kept at the WWTP. The park manager is not including his initials when making entries into the log, and the log does not include information on the visits made by the certified

Mr. Daniel Inks
December 28, 2012
Page Two

operators, Bob Davis and Lynn Makeever. I included an example log sheet for your use in my previous inspection report. You have apparently chosen not to use the example sheet. You have 21 days from receipt of this letter to provide our office with an example of a log book that will meet all of the criteria in your NPDES permit and Ohio Administrative Code (OAC) 3745-7-09.

We are in receipt of your discharge monitoring reports covering the months of May through December 2012 for the referenced facility. A review of the reports revealed several **violations** of the limits contained in your NPDES permit. Your facility is currently in significant non-compliance (SNC) with these limits.

A facility becomes in SNC when it exceeds the effluent limit for four or more months in two consecutive quarters or exceeds the effluent limit significantly in any two months during two consecutive quarters. Achieving compliance with Ohio's environmental laws is a primary focus of Ohio EPA in order to reduce risks to public health and welfare.

Before we initiate enforcement action, we would like to work with you to achieve satisfactory progress to bring this facility back into compliance. **Within 21 days of the date of this letter**, please submit, in writing, the actions that you propose to undertake in order to return your facility into compliance with your NPDES permit. You will also need to give us a timetable for these actions that does not extend past May 31, 2013. These actions and timetable may also be submitted by email to me at walter.ariss@epa.ohio.gov. It would be best to consult with your certified operator while preparing your response to our office. Included in this submittal should be a copy of the as built drawings for the flow EQ facilities and an example of a log book that will meet all of the requirements of your NPDES permit and OAC 3745-7-09.

If you wish to meet with us to discuss this matter, please contact me within 10 days of receiving this letter in order to set up a meeting.

If you have any questions, please call me at 419-373-3070.

Sincerely,



Walter Ariss, P.E.
Environmental Specialist II
Division of Surface Water

/jlm

Enclosures

pc: Lyn Makeever, Makeever and Associates Inc.

ec: Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 28400028

Facility Name Maheon River Estates MHP Expiration Date 11/30/13

Facility Address 3055 CR 3175 Date 1/16/12 Time 3:00 am (pm)

City Loudonville County Ashland Township _____

Name and Address of Owner Larchmere Apartments

Person Contacted _____ Owner Phone _____

Flow: Design 20,000 GPD Present 8,000-50,000 GPD (metered - estimated)

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 45° clouds

OEPA Personnel Walter Ariss District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None	X	Clear	X	None	X	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: Back Fork Maheon

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None	X	Clear	X	None	X	Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has _____ excellent X good _____ fair _____ poor operation
 b. Plant has _____ excellent X good _____ fair _____ poor maintenance
 c. Sand filters have _____ excellent X 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 <u>X</u>	OUT _____
_____	<u>X</u> Chlorination Tablets
_____	_____ Dechlorination Tablets
_____	_____ U.V.

Yes No

4. X Compliance with NPDES Permit _____ Parameters: _____

Periodic Violations Y _____ N _____

Chronic Violations X _____ CRD, fecal, operator logs

5. X Adequate plant safety

6. X Operation and Maintenance Service Name Bob Davis / Lyn Makeover

Frequency of Visits ?

Facility Name: Mohican River Estates MHP

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	X	Trash Trap	Pumping Frequency: ?
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
	X	Flow Equalization <i>operation ok</i>	<i>tanks installed differently from plans</i>
Aeration Equipment		Plant Timer <u>X</u> <u>Y</u> <u>X</u> <u>N</u>	Cycle Time: <i>Plant blowers on</i>
	X	Motor/ Blower Unit <i>EQ on timer</i>	
Secondary Treatment	X	Aeration Tank	Color: <i>good color</i> Adequate Aeration: <u>Y</u> <u>X</u> <u>N</u> <u> </u>
Final Settling	X	Clarifier	<i>good clarity - can see several feet down</i>
	X	Sludge Return	In <u>X</u> Out <u> </u>
	X	Surface Skimmer	In <u>X</u> Out <u> </u>
		Fixed Media Clarifier	
Tertiary Treatment	X	Surface Sand Filter	<i>using north east bed</i> <i>other beds appear clean + ready</i>
		Polishing Pond	
		Other	
Disinfection	X	Chlorine Tube Feeder	<i>1/2 full tablets - need to remove</i>
	X	Dechlorination Tube Feeder	<i>no tabs</i>
		Ultraviolet (UV)	
Flow Metering	X	Elapsed Pump Time	<i>on filter dosing</i>
		Recorder (continuous total)	
Pumps	X	Raw Wastewater (type) <i>Flow EQ</i>	<i>okay</i>
	X	Sand Filter Effluent Dosing	<i>okay</i>
Sludge Handling	X	Aerated Storage Tank	<i>1/2 full, air on</i>
		Sludge Drying Bed	
Sludge Disposal	X	Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment	X	Post Aeration	<i>on</i>
		Spray Irrigation	
		Other	

Get New Data		Mohican River Estates MHP NPDES permit limit violations May through November 2012						
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00028*CD	May 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	5/2/2012
2PY00028*CD	May 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	5/9/2012
2PY00028*CD	May 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	5/16/2012
2PY00028*CD	May 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	5/23/2012
2PY00028*CD	May 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	5/30/2012
2PY00028*CD	June 2012	001	00530	Total Suspended Solids	30D Conc	12	84.	6/1/2012
2PY00028*CD	June 2012	001	00530	Total Suspended Solids	30D Qty	0.91	1.90764	6/1/2012
2PY00028*CD	June 2012	001	31616	Fecal Coliform	30D Conc	1000	1500.	6/1/2012
2PY00028*CD	June 2012	001	80082	CBOD 5 day	30D Conc	10	50.	6/1/2012
2PY00028*CD	June 2012	001	80082	CBOD 5 day	30D Qty	0.76	1.1355	6/1/2012
2PY00028*CD	June 2012	001	00530	Total Suspended Solids	1D Conc	18	84.	6/5/2012
2PY00028*CD	June 2012	001	00530	Total Suspended Solids	1D Qty	1.4	1.90764	6/5/2012
2PY00028*CD	June 2012	001	80082	CBOD 5 day	1D Conc	12	50.	6/5/2012
2PY00028*CD	June 2012	001	80082	CBOD 5 day	1D Qty	0.91	1.1355	6/5/2012
2PY00028*CD	July 2012	001	80082	CBOD 5 day	30D Conc	10	14.	7/1/2012
2PY00028*CD	July 2012	001	80082	CBOD 5 day	1D Conc	12	14.	7/3/2012
2PY00028*CD	August 2012	001	00530	Total Suspended Solids	30D Conc	12	16.	8/1/2012
2PY00028*CD	August 2012	001	80082	CBOD 5 day	1D Conc	12	18.	8/1/2012
2PY00028*CD	August 2012	001	80082	CBOD 5 day	30D Conc	10	18.	8/1/2012
2PY00028*CD	September 2012	001	31616	Fecal Coliform	30D Conc	1000	1500.	9/1/2012
2PY00028*CD	October 2012	001	00530	Total Suspended Solids	1D Conc	18	24.	10/1/2012
2PY00028*CD	October 2012	001	00530	Total Suspended Solids	30D Conc	12	24.	10/1/2012
2PY00028*CD	October 2012	001	00530	Total Suspended Solids	30D Qty	0.91	1.18092	10/1/2012
2PY00028*CD	October 2012	001	80082	CBOD 5 day	1D Conc	12	20.	10/1/2012
2PY00028*CD	October 2012	001	80082	CBOD 5 day	30D Conc	10	20.	10/1/2012
2PY00028*CD	October 2012	001	80082	CBOD 5 day	1D Qty	0.91	.9841	10/1/2012
2PY00028*CD	October 2012	001	80082	CBOD 5 day	30D Qty	0.76	.9841	10/1/2012