



**Environmental
Protection Agency**

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

Re: **Notice of Violation**
Erie County
Shore Acres MHP
NPDES Permit

September 10, 2012

Mr. Dennis Lugli, Owner
Shore Acres MHP
1309 County Road 16
New London, Ohio 44851

Dear Mr. Lugli:

On August 8, 2012, an inspection was made of the wastewater treatment facilities serving the Shore Acres Mobile Home Park (MHP). At the time of my visit, all major treatment components were in operation and a clear final effluent was observed being discharged from the outlet pipe to Lake Erie. In general, both operation and maintenance appeared good.

National Pollutant Discharge Elimination System (NPDES) monthly discharge monitoring reports are being received in a timely manner; however, final effluent ammonia and E.coli bacteria violations continue to be reported this season. Also, the Erie County Health Department provided me their analyses indicating high levels of E. coli bacteria in the plant effluent during the course of an investigation of elevated bacteria levels in nearby bathing water beaches. Chronic ammonia violations are also an issue and need to be addressed. Enclosed is a copy of the NPDES permit violations and health department findings for your review

Although this facility appears to be well operated and maintained, steps need to be taken to improve NPDES permit compliance. During our follow up phone conversation, you stated that you are aware of these issues and are in the process of implementing improvements. I am asking you to submit a compliance plan to address the above noted effluent violations. Continued NPDES permit violations may subject you to escalated enforcement action from this agency.

Your NPDES permit has record keeping provisions that require visits and maintenance be documented in a logbook that must be kept on-site for Ohio EPA review. A logbook is being kept; however, it should be relocated into a weatherproof enclosure at the wastewater plant site.

Enclosed is my inspection report and list of violations. If you have any questions, please call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us.

Sincerely,

Richard A. Zuzik, MSE
Division of Surface Water

/jlm
Enclosures
pc: Erie County Health Department
ec: Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 150,000 GPD

NPDES Permit No. 2PY00079*AD

Facility Name Shore Acres MHP Expiration Date 6-30-15
 Facility Location West Lake & Coen Date 8-8-12 Time 2⁰⁰ am/pm
 City - County Erie Township Vermilion
 Name of Owner Dennis Lugli Owner Phone (419) 929-4905
 Person Contacted none Operator of Record Dennis Lugli Cell: (419) 685-1652
 Flow Design 15,000 GPD WWTP Classification: A or I
 Trib. Pop. 65 lots (actual - estimated) Weather at time of inspection: Temp 80° - Clear
 OEPA Personnel Rick Zuzik District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	Turbidity	Odor	Color
<u>0</u>	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: L. Erie

No.	Severity Description	Turbidity	Odor	Color
<u>0</u>	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 N/A
 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 <input checked="" type="checkbox"/>	OUT <input type="checkbox"/>	Chlorination Tablets
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination Tablets
<input type="checkbox"/>	<input type="checkbox"/>	Ultraviolet (U.V.)

Yes No (6/11 - 7/12)

4. Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____

Chronic Violations Ammonia, E. coli

5. O & M logbook kept and available on site: Location Office - Needs moved to WWTP site

6. Staffing Requirement Met (Class A - 2 days per week for minimum 1 hour per week)
 (Class I - 3 days per week for minimum 1.5 hours per week)

7. Adequate Plant Safety: Deficiencies _____

Facility Name: Shore Acres MHP

Process	# Units	Unit	If Needed -- Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency
		Grease Trap	Pumping Frequency
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment	2	Plant Timer ____Y ____N	Cycle Time:
		Motor / Blower Unit	
Secondary Treatment	2	Aeration Tank	Color: <i>Brown</i> Adequate Aeration Y <input checked="" type="checkbox"/> N
Final Settling	1	Clarifier	<i>good settling</i>
	2	Sludge Return	In / Out
	1	Surface Skimmer	In / Out
		Fixed Media Clarifier	
Tertiary Treatment		Surface Sand Filter	
		Polishing Pond	
		Other	
Disinfection	1	Contact Tank / <i>Dechlor</i>	<i>IN</i>
	1	Chlorine Tube Feeder	<i>IN</i>
	1	Dechlorination Tube Feeder	<i>IN</i>
		Ultraviolet (UV)	
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling	1	Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal	/	Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment		Post Aeration	
		Spray irrigation	
		Other	

Get New Data								
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00079*AD	June 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	6.74	6/1/2011
2PY00079*AD	June 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.12	.18368	6/1/2011
2PY00079*AD	June 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3	6.74	6/13/2011
2PY00079*AD	June 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.18368	6/13/2011
2PY00079*AD	June 2011	001	50060	Chlorine, Total Residu	1D Conc	0.038	.84	6/28/2011
2PY00079*AD	June 2011	001	31648	E. coli	1D Conc	126	172.	6/28/2011
2PY00079*AD	July 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	21.4	7/1/2011
2PY00079*AD	July 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.12	.67229	7/1/2011
2PY00079*AD	July 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3	21.4	7/6/2011
2PY00079*AD	July 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.67229	7/6/2011
2PY00079*AD	July 2011	001	31648	E. coli	1D Conc	126	61000.	7/6/2011
2PY00079*AD	August 2011	001	50060	Chlorine, Total Residu	1D Conc	0.038	21.	8/4/2011
2PY00079*AD	September 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	18.9	9/1/2011
2PY00079*AD	September 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.12	.60091	9/1/2011
2PY00079*AD	September 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3	18.9	9/13/2011
2PY00079*AD	September 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.60091	9/13/2011
2PY00079*AD	September 2011	001	50060	Chlorine, Total Residu	1D Conc	0.038	1.19	9/13/2011
2PY00079*AD	September 2011	001	31648	E. coli	1D Conc	126	2300.	9/13/2011
2PY00079*AD	October 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	2.55	10/1/2011
2PY00079*AD	October 2011	001	31648	E. coli	1D Conc	126	17000.	10/5/2011
2PY00079*AD	October 2011	001	50060	Chlorine, Total Residu	1D Conc	0.038	.51	10/12/2011
2PY00079*AD	October 2011	001	50060	Chlorine, Total Residu	1D Conc	0.038	.15	10/17/2011
2PY00079*AD	December 2011	001	80082	CBOD 5 day	30D Conc	15	23.	12/1/2011
2PY00079*AD	December 2011	001	80082	CBOD 5 day	1D Conc	22.5	23.	12/27/2011
2PY00079*AD	May 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	1.27	5/14/2012
2PY00079*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	7.725	6/1/2012
2PY00079*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.12	.2573	6/1/2012
2PY00079*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3	9.04	6/12/2012
2PY00079*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.3011	6/12/2012
2PY00079*AD	June 2012	001	31648	E. coli	1D Conc	126	600.	6/12/2012
2PY00079*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3	6.41	6/26/2012
2PY00079*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.2135	6/26/2012
2PY00079*AD	July 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	15.8	7/1/2012
2PY00079*AD	July 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.12	.59803	7/1/2012
2PY00079*AD	July 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3	15.8	7/10/2012
2PY00079*AD	July 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.17	.59803	7/10/2012
2PY00079*AD	July 2012	001	31648	E. coli	1D Conc	126	13000.	7/10/2012

Zuzik, Rick

From: Daryl Apple <dapple@eriecohealthohio.org>
Sent: Thursday, August 16, 2012 11:31 AM
To: Zuzik, Rick
Subject: Shore Acres MHP, 13311 Lake Rd.
Attachments: Shore Acres STS Samples 8-8-12.docx; Shore Acres STS Samples 8-15-12.docx

Rick,

Attached is the info I spoke with you about for the results I took the past couple of weeks for Shore Acres MHP. I spoke with Dennis yesterday and he was asking about putting on a UV light for disinfection instead of the Chlorine / Dechlor. I think that would be a good alternative. I told him they would have to contact OEPA to do this though. I'm guessing you have a plan approval for that, right?

Also if you could respond back concerning the MCLs for E-coli for both Lake Erie discharge and other than Lake Erie I would appreciate it.

Thanks for your help.

Daryl L. Apple, RS
Registered Sanitarian
Erie County General Health District
419-626-5623 Ext. 124



Environmental Protection Agency

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

Preliminary Compliance Report

Facility: Shore Acres MHP

Permit No.: 2PY00079*AD

Report Period: July 2012

Date Received: 8/16/2012

Station	Type	Date	Reporting Point	Parameter	Limit Type	Permit Limit	Reported Value
001	Limit	7/1/2012	00610	Nitrogen, Ammonia (NH3)	Monthly Conc.	2	15.8
001	Limit	7/1/2012	00610	Nitrogen, Ammonia (NH3)	Monthly Load	0.12	.59803
001	Limit	7/10/2012	00610	Nitrogen, Ammonia (NH3)	Daily Conc.	3	15.8
001	Limit	7/10/2012	00610	Nitrogen, Ammonia (NH3)	Daily Load	0.17	.59803
001	Limit	7/10/2012	31648	E. coli	Daily Conc.	126	13000.