



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

January 16, 2013

RE: MAHONING COUNTY
TECUMSEH MHP
NPDES PERMIT NO. 3PV00023
SFY 2013 CEI

Tecumseh Village Mobile Home Park
1005 Lake Park Blvd., Lot 96
Sebring, OH 44672
Attn: Mr. Joseph Raineri, Owner

Mr. Raineri:

On December 17, 2012, this writer conducted an unannounced inspection of the Tecumseh MHP in Sebring, OH. The intent of the inspection was to evaluate the condition of the treatment plant and to review the compliance status of the facility.

Observations

Following are observations made at the time of the inspection:

1. The aeration tank had good color and mixing. However, light-colored foam covered approximately $\frac{1}{3}$ of the tank surface.
2. The return sludge was medium brown color. The return of sludge to the aeration tank from the clarifier is critical to the performance of the treatment system. Both return systems were operational at the time of the inspection.
3. Foam and floating sludge was present on the clarifier surface. The foam originated from the aeration tank and was migrating across the surface of the clarifier because no inlet baffle exists in the tank.
4. A new inlet baffle must be properly installed in the tank in accordance with Ohio EPA guidance, "Sewage: Collection, Treatment & Disposal Where Public Sewers Are Not Available". The inlet baffle shall extend across the width of the settling tank and shall extend continuously from a minimum six (6) inches above normal water level to a minimum two (2) inches beneath the invert of the inlet port to the settling tank. It shall be located no less than twelve (12) inches from the tank end wall and nor more than twenty (20) inches to allow effective collecting area for floatable materials without infringing on the clear surface settling area of the settling tank.
5. A new outlet baffle is also necessary for the clarifier. The existing outlet baffle is corroded and ineffective at preventing the migration of floatable material to the effluent trough. The outlet baffle shall be located within six (6) inches of the effluent trough and extending four (4) to eight (8) inches below and six (6) inches above the liquid level.

6. The effluent trough was surrounded by floating sludge. The sludge was periodically flowing into the effluent trough. The sludge must be removed from the trough without permitting it to be discharged to the pond, and the sludge surrounding the effluent trough must be removed from the system.
7. The weir plates are no longer present on the effluent trough of the clarifier. Adjustable weir plates are important to controlling the flow of wastewater from the system. New, adjustable weir plates must be retrofitted onto the trough. The weir plates must be properly leveled after installation.
8. Pin floc and floating sludge have resulted in past violations for Total Suspended Solids. All effort should be taken to resolve any pin floc or floating sludge formation. However, the installation of tertiary filters is critical to prevent the solids from being discharged to the pond and to prevent violations of the National Pollutant Discharge Elimination System (NPDES) Permit.
9. The scum return system was working effectively at controlling the migration of foam to the outfall. However, returning foam to the aeration tank exacerbated the foaming in the aeration tank. It is recommended that all foam on the surface of the aeration tanks and clarifier tanks be removed from the system by placing in a trashcan.
10. The treatment system has no disinfection system. As a result the system has frequent violations for bacteria. A disinfection system must be added to the treatment system in order to prevent the discharge of pathogens from the system. An ultraviolet disinfection system is recommended.
11. Blower No. 1 has not been operational for several years. The second blower must immediately be made operational as a backup source of air to the system.

Air supplied to the aeration tank and air lift pumps is critical to operation of the treatment plant. Therefore, backup blowers are required at all treatment plants to ensure uninterrupted operation.

Operation of the blowers should be switched every week in order to exercise each blower. This will prevent premature failure of a blower and will provide the opportunity to test operation of each blower on a weekly basis.

Compliance Review The compliance record for the Tecumseh MHP was reviewed as part of this inspection. The period of review was March 2011 through November 2012. Following are violations reported during the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2011	Total Suspended Solids	30D Conc	12.0	24.	3/1/2011
March 2011	Total Suspended Solids	30D Qty	0.57	.81756	3/1/2011
March 2011	Total Suspended Solids	1D Conc	18.0	24.	3/2/2011
May 2011	Fecal Coliform	30D Conc	1000	8050.	5/1/2011

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May 2011	Fecal Coliform	1D Conc	2000	8050.	5/4/2011
May 2011	Dissolved Oxygen	1D Conc	6.0	5.5	5/11/2011
June 2011	Fecal Coliform	30D Conc	1000	1440.	6/1/2011
June 2011	Dissolved Oxygen	1D Conc	6.0	5.	6/8/2011
June 2011	Dissolved Oxygen	1D Conc	6.0	5.8	6/15/2011
June 2011	Dissolved Oxygen	1D Conc	6.0	5.2	6/22/2011
July 2011	Total Suspended Solids	30D Conc	12.0	24.	7/1/2011
July 2011	Total Suspended Solids	30D Qty	0.57	.81756	7/1/2011
July 2011	Fecal Coliform	30D Conc	1000	5000.	7/1/2011
July 2011	Total Suspended Solids	1D Conc	18.0	24.	7/6/2011
July 2011	Fecal Coliform	1D Conc	2000	5000.	7/6/2011
July 2011	Dissolved Oxygen	1D Conc	6.0	4.8	7/13/2011
August 2011	Fecal Coliform	30D Conc	1000	5000.	8/1/2011
August 2011	Fecal Coliform	1D Conc	2000	5000.	8/3/2011
August 2011	Dissolved Oxygen	1D Conc	6.0	5.3	8/10/2011
August 2011	Dissolved Oxygen	1D Conc	6.0	5.3	8/24/2011
September 2011	Fecal Coliform	30D Conc	1000	4200.	9/1/2011
September 2011	Fecal Coliform	1D Conc	2000	4200.	9/7/2011
September 2011	Dissolved Oxygen	1D Conc	6.0	5.5	9/21/2011
September 2011	Dissolved Oxygen	1D Conc	6.0	5.4	9/28/2011
October 2011	Fecal Coliform	30D Conc	1000	5600.	10/1/2011
October 2011	Fecal Coliform	1D Conc	2000	5600.	10/5/2011
October 2011	Dissolved Oxygen	1D Conc	6.0	5.2	10/19/2011
October 2011	Dissolved Oxygen	1D Conc	6.0	5.3	10/26/2011
November 2011	Total Suspended Solids	30D Conc	12.0	24.	11/1/2011
November 2011	Total Suspended Solids	30D Qty	0.57	.81756	11/1/2011
November 2011	Total Suspended Solids	1D Conc	18.0	24.	11/2/2011
November 2011	Dissolved Oxygen	1D Conc	6.0	5.5	11/23/2011
December 2011	Dissolved Oxygen	1D Conc	6.0	5.4	12/21/2011
December 2011	Dissolved Oxygen	1D Conc	6.0	5.	12/28/2011
January 2012	Total Suspended Solids	30D Conc	12.0	52.	1/1/2012
January 2012	Total Suspended Solids	30D Qty	0.57	1.77138	1/1/2012
January 2012	Total Suspended Solids	1D Conc	18.0	52.	1/4/2012
January 2012	Total Suspended Solids	1D Qty	0.85	1.77138	1/4/2012
January 2012	Dissolved Oxygen	1D Conc	6.0	5.8	1/11/2012
January 2012	Dissolved Oxygen	1D Conc	6.0	5.6	1/25/2012
February 2012	Total Suspended Solids	30D Conc	12.0	17.	2/1/2012
February 2012	Total Suspended Solids	30D Qty	0.57	.57911	2/1/2012
February 2012	Dissolved Oxygen	1D Conc	6.0	5.8	2/15/2012
March 2012	Dissolved Oxygen	1D Conc	6.0	5.	3/14/2012
April 2012	Dissolved Oxygen	1D Conc	6.0	5.4	4/25/2012
May 2012	Fecal Coliform	30D Conc	1000	1050.	5/1/2012
May 2012	Dissolved Oxygen	1D Conc	6.0	5.	5/9/2012
June 2012	Total Suspended Solids	30D Conc	12.0	13.	6/1/2012
June 2012	Fecal Coliform	30D Conc	1000	2800.	6/1/2012
June 2012	Fecal Coliform	1D Conc	2000	2800.	6/6/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	5.2	6/6/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	3.9	6/13/2012
July 2012	Fecal Coliform	30D Conc	1000	15000.	7/1/2012

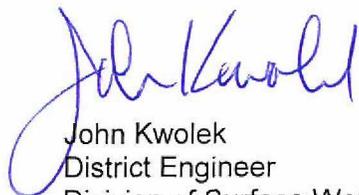
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July 2012	Fecal Coliform	1D Conc	2000	15000.	7/11/2012
July 2012	Dissolved Oxygen	1D Conc	6.0	5.	7/11/2012
August 2012	Fecal Coliform	30D Conc	1000	8050.	8/1/2012
August 2012	Dissolved Oxygen	1D Conc	6.0	5.5	8/8/2012
August 2012	Fecal Coliform	1D Conc	2000	8050.	8/15/2012
August 2012	Dissolved Oxygen	1D Conc	6.0	5.5	8/15/2012
September 2012	Fecal Coliform	30D Conc	1000	8400.	9/1/2012
September 2012	Fecal Coliform	1D Conc	2000	8400.	9/5/2012
October 2012	Total Suspended Solids	30D Conc	12.0	13.	10/1/2012
October 2012	Fecal Coliform	30D Conc	1000	11200.	10/1/2012
October 2012	Fecal Coliform	1D Conc	2000	11200.	10/3/2012
November 2012	Total Suspended Solids	30D Conc	12.0	21.	11/1/2012
November 2012	Total Suspended Solids	30D Qty	0.57	.71537	11/1/2012
November 2012	Total Suspended Solids	1D Conc	18.0	21.	11/7/2012

Be advised that violations of the NPDES Permit are considered violations of Ohio Revised Code (R.C.) 6111.07 and are subject to enforcement action. The treatment plant requires upgrades to the system in order to consistently comply with pollutant limits in the NPDES Permit. Ohio EPA guidance manual, , "Sewage: Collection, Treatment & Disposal Where Public Sewers Are Not Available" should be referenced to determine necessary upgrades to the system.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this inspection letter.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/cs