



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

April 3, 2013

RE: GEauga COUNTY
HAMBden
LEADERS MHP
NPDES PERMIT 3PV00079

NOTICE OF VIOLATION

CERTIFIED LETTER

Mr. David Leichtman
Leaders Properties, LLC
P.O. Box 308
Chesterland, OH 44026

Dear Mr. Leichtman,

On April 4, 2013, this writer conducted an inspection of the sewage treatment plant serving the above referenced facility. The intent of the inspection was to assess the operations and maintenance of the treatment system and review compliance with the National Pollutant Discharge Elimination System (NPDES) permit.

According to Agency records, an upgraded wastewater treatment system was installed under Ohio EPA permit-to-install (PTI) 567194, which was effective August 22, 2006. The wastewater treatment plant (WWTP) is permitted to discharge 50,000 gpd. The wastewater system includes a trash trap, flow equalization tank, two separate treatment trains consisting of aeration and settling, dosing chamber and surface sand filters (total surface area of 5,600 ft² equally divided into four beds). The system is served by a chlorine contact tank which provides chlorination and dechlorination. The facility is equipped with an aerobic digester for solids concentration and two sludge drying beds.

Below are the findings and recommendations from the inspection:

INSPECTION SUMMARY

The inspection revealed the WWTP was in operation and producing what appeared to be a satisfactory quality effluent. At the time of the inspection, all treatment system components were in operation. The blower serving the flow equalization tank was in operation. The extended aeration treatment system and clarifiers were in operation.

The circular sand filters were not in satisfactory condition. At the time of the inspection, the filter bed in service was overflowing the sidewalls of the filter. Partially treated wastewater and solids were visually observed discharging onto the area surrounding the sand filters. This discharged wastewater was running downhill and entering the adjacent pond. The other three filter beds were either covered with a thick layer of solids or contained vegetation. The sidewalls of the filter contained numerous cracks with patched areas that appeared to be leaking.

The final outfall from the WWTP, located at the inlet to the pond, appeared clear. The pond was reviewed and appeared very full and nearly overflowing the hill, which separates the pond from a trail/pathway located downhill.

NPDES PERMIT COMPLIANCE

According to the NPDES permit, the wastewater treatment system is listed as a Class I Wastewater Treatment system. Our records indicate John Adams (WW3) is the certified operator of record (ORC) for this facility.

According to the discharge monitoring report (DMR) data from January 1, 2011 through March 1, 2013 averaged 53,842 gpd. The average flow discharged from the WWTP is higher than the average design flow (permitted flow) of 50,000 gpd. The higher flows indicate the system is hydraulically overloaded which could be due to excessive inflow and infiltration, overloading the system with too many users or a combination of both. The following is a list of NPDES permit discharge violations for the above noted review period:

Leaders MHP Discharge Violations 1/1/11-3/1/13

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.0	8.47	1/6/2011
January 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	1.14	1.63501	1/6/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	4.4725	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.28	.9011	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.25	4.24	5/3/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.43	.85057	5/3/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.25	3.82	5/17/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.43	.76631	5/17/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.25	4.65	5/18/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.43	.96801	5/18/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.25	5.18	5/24/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.43	1.01953	5/24/2011
February 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.0	10.2535	2/1/2013
February 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.757	2.67664	2/1/2013
February 2013	001	00530	Total Suspended Solids	7D Qty	3.41	3.65631	2/15/2013
February 2013	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	6.0	20.4	2/15/2013
February 2013	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	1.140	5.32777	2/15/2013

The frequency of the ammonia violations indicates a problem exists in the treatment of the wastewater at the facility. A list of frequency violations has been attached to this letter.

SUMMARY

To date, Leaders MHP has not provided Ohio EPA with a notification regarding the overflows from the circular sand filter. As such, Leaders MHP is in violation of Part 3, #3 for failure to maintain the wastewater treatment works and Part 3, #12 (b)(2) for failure to report a spill or unauthorized discharge.

This site is located in the Upper Cuyahoga River Watershed, which is monitored not only by this office but also by the Akron Water Supply. It is understood the Akron Water Supply has assessed this facility at least two times in the past six months for potential contamination of the watershed area (see enclosed letter). The findings from the Akron Water Supply are similar to the findings by this office.

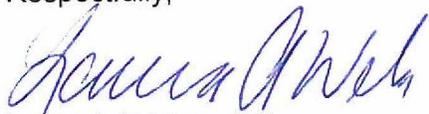
Leaders MHP must restore the surface sand filters to satisfactory operation and maintenance condition. This includes, but is not limited to, raking all filter beds to remove solids and vegetation, properly disposing of old filter sand and replacing with Ohio EPA approved filter media, discarding all removed solids in a dumpster for disposal at a solids waste handling facility, stabilizing the ground between the circular sand filter and the pond and removing any solids which have accumulated on the ground from the sand filter overflow.

In addition, this office is requesting Leaders MHP to review flow monitoring records for accuracy. The cause of high flows must be reviewed. If the cause is found to be the collection system, this office would request a formal sanitary sewer evaluation be performed as soon as possible.

This office is requesting Leaders MHP to respond, in writing, within 10 days of receipt of this letter. The response must summarize what actions will be taken to restore the sand filters and retain compliance with the NPDES permit. Failure to respond to this letter may result in this matter being referred to our Legal Section for enforcement action.

Should you have any comments or questions regarding this letter or your non-compliance, please contact this office at (330)963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

Pc: Geauga County Health Department

Cc: Chip Hess, Hess and Associates

Leaders MHP Frequency Violations 1/1/11-3/1/13

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2011	001	00010	Water Temperature	1/Day	1	0	1/3/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/7/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/10/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/14/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/19/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/21/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/24/2011
January 2011	001	00010	Water Temperature	1/Day	1	0	1/28/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/3/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/7/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/10/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/14/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/19/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/21/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/24/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	1/28/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/3/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/7/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/10/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/14/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/19/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/21/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/24/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	1/28/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/3/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/7/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/10/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/14/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/19/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/21/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/24/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	1/28/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/2/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/3/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/7/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/11/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/13/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/18/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/21/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/25/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/28/2011
March 2011	001	00010	Water Temperature	1/Day	1	0	3/30/2011
March 2011	001	00083	Color, Severity	1/Day	1	0	3/2/2011

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March	2011	001	00083	Color, Severity	1/Day	1	0	3/3/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/7/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/11/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/13/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/18/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/21/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/25/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/28/2011
March	2011	001	00083	Color, Severity	1/Day	1	0	3/30/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/2/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/3/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/7/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/11/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/13/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/18/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/21/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/25/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/28/2011
March	2011	001	01330	Odor, Severity	1/Day	1	0	3/30/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/2/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/3/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/7/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/11/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/13/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/18/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/21/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/25/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/28/2011
March	2011	001	01350	Turbidity, Severity	1/Day	1	0	3/30/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/3/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/8/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/13/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/15/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/17/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/22/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/25/2011
April	2011	001	00010	Water Temperature	1/Day	1	0	4/27/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/3/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/8/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/13/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/15/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/17/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/22/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/25/2011
April	2011	001	00083	Color, Severity	1/Day	1	0	4/27/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/3/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/8/2011

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April	2011	001	01330	Odor, Severity	1/Day	1	0	4/13/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/15/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/17/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/22/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/25/2011
April	2011	001	01330	Odor, Severity	1/Day	1	0	4/27/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/3/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/8/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/13/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/15/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/17/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/22/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/25/2011
April	2011	001	01350	Turbidity, Severity	1/Day	1	0	4/27/2011
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May	2011	001	00010	Water Temperature	1/Day	1	0	5/6/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/9/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/13/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/16/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/20/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/25/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/27/2011
May	2011	001	00010	Water Temperature	1/Day	1	0	5/28/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/2/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/6/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/9/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/13/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/16/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/20/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/25/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/27/2011
May	2011	001	00083	Color, Severity	1/Day	1	0	5/28/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/2/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/6/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/9/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/13/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/16/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/20/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/25/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/27/2011
May	2011	001	01330	Odor, Severity	1/Day	1	0	5/28/2011
May	2011	001	01350	Turbidity, Severity	1/Day	1	0	5/2/2011
May	2011	001	01350	Turbidity, Severity	1/Day	1	0	5/6/2011
May	2011	001	01350	Turbidity, Severity	1/Day	1	0	5/9/2011
May	2011	001	01350	Turbidity, Severity	1/Day	1	0	5/13/2011
May	2011	001	01350	Turbidity, Severity	1/Day	1	0	5/16/2011
May	2011	001	01350	Turbidity, Severity	1/Day	1	0	5/20/2011

July	2011	001	00083	Color, Severity	1/Day	1	0	7/11/2011
July	2011	001	00083	Color, Severity	1/Day	1	0	7/15/2011
July	2011	001	00083	Color, Severity	1/Day	1	0	7/18/2011
July	2011	001	00083	Color, Severity	1/Day	1	0	7/22/2011
July	2011	001	00083	Color, Severity	1/Day	1	0	7/23/2011
July	2011	001	00083	Color, Severity	1/Day	1	0	7/29/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/1/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/3/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/8/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/11/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/15/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/18/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/22/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/23/2011
July	2011	001	01330	Odor, Severity	1/Day	1	0	7/29/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/1/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/3/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/8/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/11/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/15/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/18/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/22/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/23/2011
July	2011	001	01350	Turbidity, Severity	1/Day	1	0	7/29/2011
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August	2011	001	00010	Water Temperature	1/Day	1	0	8/3/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/8/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/14/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/17/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/21/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/22/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/27/2011
August	2011	001	00010	Water Temperature	1/Day	1	0	8/29/2011
August	2011	001	00083	Color, Severity	1/Day	1	0	8/1/2011
August	2011	001	00083	Color, Severity	1/Day	1	0	8/22/2011
August	2011	001	01330	Odor, Severity	1/Day	1	0	8/1/2011
August	2011	001	01330	Odor, Severity	1/Day	1	0	8/22/2011
August	2011	001	01350	Turbidity, Severity	1/Day	1	0	8/1/2011
August	2011	001	01350	Turbidity, Severity	1/Day	1	0	8/22/2011