



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

May 31, 2013

RE: WHISPERING WILLOW MHC  
NPDES PERMIT NO. 3PV00084  
HARPERSFIELD TWP, ASHTABULA CO.  
COMPLIANCE EVALUATION INSPECTION

Mr. Steve Ureel, General Partner  
4 MHC Associates Limited Partnership  
Whispering Willow Mobile Home Community  
1120 North Main Street  
Rochester, MI 48307

Dear Mr. Ureel:

On May 30, 2013, a site inspection was conducted at the above referenced facility at 4250 State Route 307, Harpersfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and Marlene Knopsnider represented 4 MHC Associates Limited Partnership (4MHC), d.b.a. Whispering Willow Mobile Home Community (owner) and Lewis Wastewater Services (operator). The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on October 29, 2012.

The collection system consists of a gravity system located east and northeast of the wastewater treatment plant (WWTP). The treatment system consists of a trash trap, flow equalization basin, extended aeration tanks, clarification, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the sludge tanks when needed to another publicly owned treatment works (POTW). The facility discharges to the Grand River adjacent to the southwest side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

#### **Observations and Notations**

Following are observations and notations were made during the inspection:

1. The plant is operated by Marlene Knopsnider and Dustin Lewis of Lewis Wastewater Services on behalf of 4 MHC Associates Limited Partnership (4MHC), d.b.a. Whispering Willow Mobile Home Community.
2. Log books, and a copy of NPDES permit, operator contract, and the operation and maintenance manual are maintained at the site and were available for inspection. The log book is compliant with OAC 3745-7-09.
3. The overall condition of the treatment plant during this inspection was satisfactory.
4. The trash trap was functioning properly during the inspection. Collected trash was containerized for disposal at a solid waste landfill. Trash and sludge is removed from the plant every three months. Sludge and trash is hauled by Northeast Septic.

5. One equalization tank pump was pulled on May 23, 2013, and parts are on order. The equalization tank blowers and remaining pump were cycled and found in operating condition. The alarm was cycled and found in operational condition.
6. The content of the aeration tank had a chocolate brown color, no odor, and good mixing. Sludge returns were a medium brown color with minimal foaming. The blowers were cycled and found in operating condition. Return sludge lines were found functioning. The alarms were tested and found in operating condition.
7. The sludge holding tank was noted as cleaned and operating properly at the time of the inspection.
8. The surface of the clarifier was clear and both the effluent weir and skimmer were functioning properly at the time of this inspection. Effluent weirs and channels appear reasonably clean.
9. Surface sand dosing tank and siphon were found in operating condition.
10. The South Sand Bed was in operation at the time of the inspection. The sand was found to contain some fine sludge mixed into the sand, and was found raked, level and reasonably clean. Ms. Knopsnider indicated that new sand has been ordered and expected to be installed within the next 30 to 45 days. The North sand Bed was found raked and reasonably clean, with some evidence of sludge around the slash pad. Sludge appears to have been placed outside the beds along the west side of the wall. All materials removed from the sand beds must be placed into containers and managed as a solid waste at a minimum.
11. The chlorination and dechlorination tank is stocked with appropriate chemicals and was reasonably clean.
12. The final effluent was discharging and was clear. The final discharge at the Grand River was observed as clear.
13. Marlene Knopsnider maintains the facility in conjunction with Mr. Dustin Lewis of Clean Stream, Inc. Samples are collected by Lewis Wastewater Services, who perform on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity. Ms. Knopsnider records daily readings of flow and turbidity. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples. Clean Streams submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of 4MHC.

#### **NPDES Permit Compliance Review**

A review of the eDMRs received by Ohio EPA for the period October 1, 2012 through May 1, 2013 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

#### **Limit Violations**

No effluent limit violations were noted for the time period reviewed.

#### **Reporting Violations**

No reporting code or reporting frequency violations are noted for the time period reviewed.

Compliance Schedule

Your current NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
2/1/2013	1/31/2018	2/1/2014	Incomplete	95999	Construction	E Coli Status Report
2/1/2013	1/31/2018	3/1/2014	Incomplete	-----	Construction	PTI if Needed
2/1/2013	1/31/2018	8/1/2014	Incomplete	05699	Construction	Comply w/Effluent Limits

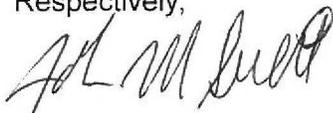
As milestones have not yet passed, no action is needed at this time.

Other Violations

1. Investigate Inflow and Infiltration: During the October 2012 inspection, the plant was observed as hydraulically overloaded due to receiving excessive inflow. The source of the excessive inflow was to be investigated and corrected. Surface waters were to be diverted away from process tanks so that tanks do not receive unnecessary rainwater and snowmelt, which adversely affect treatment processes. Consideration may also be given to raising the elevation of the tanks via tank extensions. A surface berm and swale that curves around the facility should be installed to convey storm water run-on away from the WWTP. The existing collection system should also be investigated for excessive inflow and infiltration from damaged collection piping, storm water connections, etc. Discussions with Ms. Knopsnider indicated that a swale could be constructed to coincide with the filter bed sand replacement to occur within the next 30 to 45 days. **To-date Ohio EPA has not received a schedule for taking these corrective measures and a schedule for conducting this inflow and infiltration investigation. Ohio EPA will expect a written schedule to complete these activities within 30 days of the date of this letter.**

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

Dustin Lewis, Lewis Wastewater Management  
Marlene Knopsnider

File/SP/Ashtabula/Harpersfield Twp/Whispering Willow MHC (3PV00084)