

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



July 17, 2013

RE: WAYNE COUNTY
CHIPPEWA TWP
SUNDIAL MHP
NPDES #3PV00121

NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Tennis King
Sundial MHP
15091 Portage Street Office
Doylestown, Ohio 44230

Dear Mr. King:

On July 10, 2013, Dean Stoll and this writer conducted an inspection of the wastewater treatment plant (WWTP) serving the above referenced facility. The intent of the inspection was to evaluate the progress of the WWTP since this office's previous inspection. You represented the facility during the inspection.

Our records indicate the WWTP was installed around 1964 and expanded in 1970. The WWTP serves a 61 lot mobile home park. The system consists of a 2,500-gallon trash trap, a 5,000-gallon and 15,000-gallon extended aeration package plant in series, a 2,900-gallon dosing chamber and a 1,925 square foot surface sand filter.

Listed below are the findings from the inspection:

- 1) Ohio EPA records show that Sundial MHP does not have an Operator of Record official listed for the WWTP. You stated during the inspection that you were licensed and the ORC for the WWTP. Not having a designated ORC is a violation of Ohio Revised Code (ORC) 3745-7. You need to fill out and mail to Ohio EPA a completed ORC form which can be found on Ohio EPA's website at: <http://epa.ohio.gov/dsw/opcert/opcert.aspx>
- 2) The trash trap was full on solids and needed to be pumped out. You need to schedule a licensed hauler to pump out the trap. Attached photo 1 shows the condition of the trash trap.
- 3) When Ohio EPA arrived on site, the air to the aeration tank was turned off. You stated this was so the solids could settle and the tank could be pumped out. By not having the air turned on the sewage was not receiving proper treatment. Attached photo 2 shows the aeration tanks turned off.

Your expired NPDES permit contained a compliance schedule that required you to submit a Permit-to-Install (PTI) for a sludge holding tank. To date a PTI has not been received and the sludge holding tank has not been installed. You are in noncompliance with your NPDES permit for failing to comply with your compliance schedule.

- 4) The WWTP does not have a chlorination/dechlorination contact tank. Currently, you feed chlorine into the clarifier with a device made for a swimming pool. This method of chlorination does not meet treatment standards and does not provide disinfection to the wastewater. Attached photo 3 shows the chlorine device.

Your expired NPDES permit contained a compliance schedule that required you to submit a Permit to Install (PTI) for a disinfection system. To date a PTI has not been received and a disinfection system has not been installed. You are in noncompliance with your NPDES permit for failing to comply with your compliance schedule.

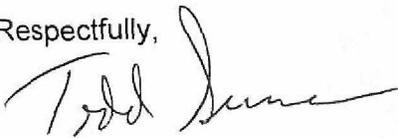
- 5) The dosing pumps were operating and an elapsed time meters have been installed on the pumps. The elapsed time meters were required in the NPDES permit compliance schedule. Ohio EPA did not receive a PTI for these meters.
- 6) The splitter box for the sand filter beds was broken and leaking wastewater on the ground. Bypassing around any portion of your treatment system violates the conditions of your NPDES permit, specifically Part III, item 11. Photo shows the broken splitter box. Attached photos 4 and 5 show the splitter box.
- 7) The sand filter beds were found in poor condition. The walls were cracked and wastewater could be seen spilling from one bed to another. Additionally, the sand was in poor condition and solids were accumulating on the surface. Water was pooling on the surface of the filter beds and was slow to drain which is another indication that the beds are full of solids. You stated during the inspection that the sand has not been replaced. Photo shows the poor condition of the filter beds. Attached photos 6, 7 and 8 show the condition of the sand filter beds.

Your expired NPDES permit contained a compliance schedule that required you to replace the sand in the sand filter beds and to repair the beds. To date, the sand filter beds have not been addressed. You are in noncompliance with your NPDES permit for failing to comply with your compliance schedule.

- 8) The electric service to the plant is being provided by an exposed wire stretched on top of the ground. The wire crosses the roadway which cars are driving over and people are walking over. The exposed electrical wire is a health and safety issue which should be fixed immediately. Photo shows the exposed electrical connection. Attached photo 9 shows the exposed electrical connection.
- 9) A review of your Discharge Monitoring Reports (DMR) covering the period January 1, 2010, through June 30, 2013, reveals that you did not start submitting reports till July 1, 2012. Since July 1, 2012, you have been submitting monthly DMR. Not submitting discharge monitoring reports is a violation of your NPDES permit. Since July 1, 2012, records reveal no limit violations.

Sundial MHP is currently in the enforcement process with Ohio EPA. The finding of this inspection will be submitted to Ohio EPA legal.

Should you have any comments or questions regarding this letter, please contact this office at (330) 963-1255.

Respectfully,


Todd Surrena
Engineering Geologist
Division of Surface Water

TMS/cs

Attachments: Photos

cc: Wayne County Health Department

ec: Michael Shapiro, Ohio EPA, Legal, CO
Larry Reeder, Ohio EPA, DSW, CO

File/Semi-Public/Wayne/Chippewa Twp

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.	<p>A. Signature <input checked="" type="checkbox"/> <i>Tennis King</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>1. Article Addressed to:</p> <div data-bbox="345 1514 857 1707" style="background-color: #ADD8E6; padding: 5px;"><p>Mr. Tennis King Sundial MHP 15091 Portage Street Office Doylestown, Ohio 44230</p></div>	<p>B. Received by (Printed Name) <i>Tennis King</i> C. Date of Delivery <i>8/1/13</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label) <i>7012 3050 0001 8843 1412 DSW</i></p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>



Photo 1: Trash trap full of solids.

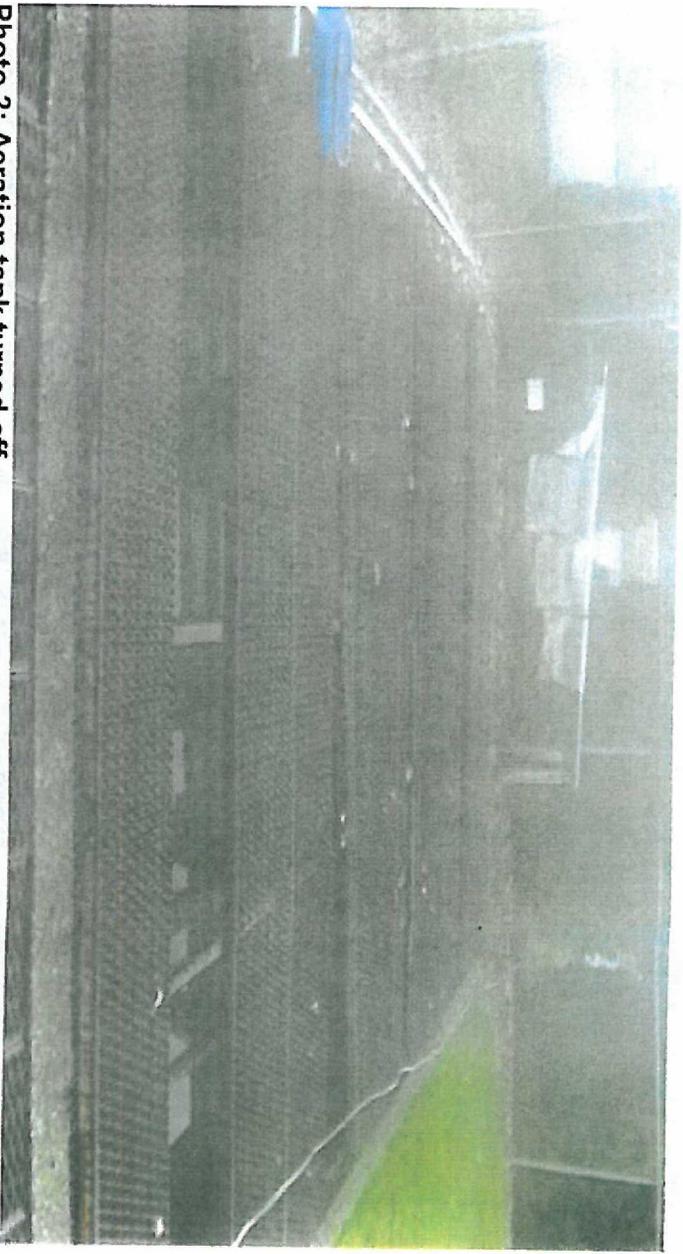


Photo 2: Aeration tank turned off.



Photo 3: Chlorination device in clarifier.



Photo 4: Broken splitter box.



Photo 5: Broken splitter box discharging wastewater onto the ground.

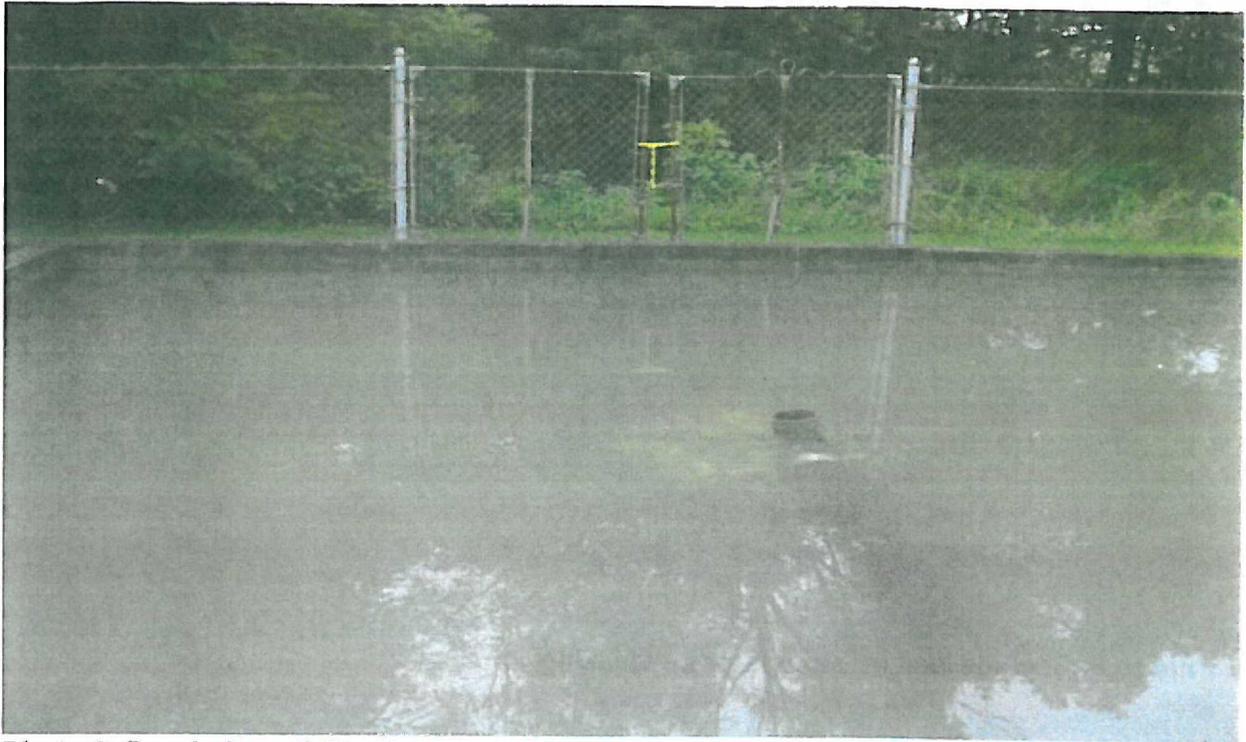


Photo 6: Ponded sand filter bed.

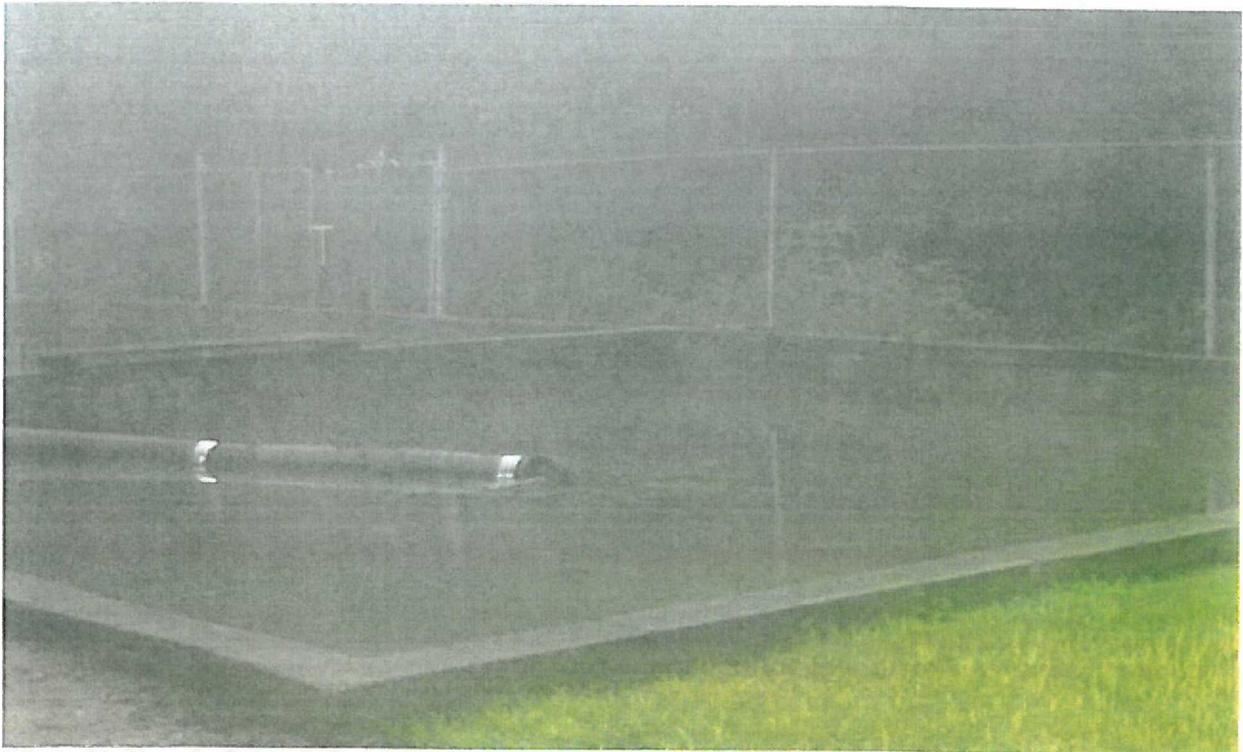


Photo 7: Ponded sand filter bed in poor condition.

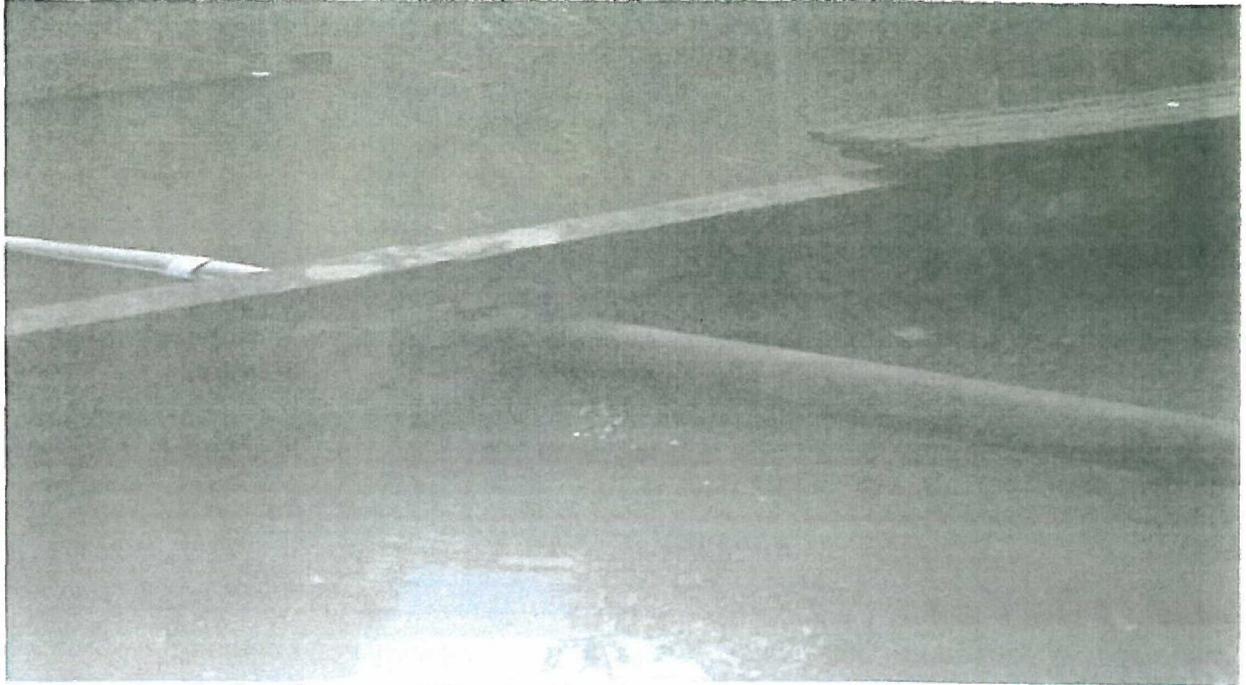


Photo 8: Cracked wall on sand filter bed leaking.



Photo 9: Exposed electrical connection across the road.