



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

Re: Seneca County
Poplar Village Mobile Home Park
NPDES #2PY00032

August 28, 2013

Mr. Robert Merchant
HAP III, LP
12400 State Highway 71-W #350-245
Austin, Texas 78738

Dear Mr. Merchant:

On July 9, 2013, an inspection of the wastewater treatment facility that serves Poplar Village Mobile Home Park (MHP) was made. The MHP is located at 12400 West Axline Street, just south east of Fostoria, Loudon Township. Mr. Tony Zitter, Park Manager, was present and provided information regarding the plant's operation. The following observations and recommendations were made:

1. Inflow and infiltration (I/I) due to frequent rain events continues to result in overloading of flow to the wastewater treatment plant (WWTP). The contents of the aeration and clarifier tanks appeared to be operating at an elevated level. The clarifier appeared turbid as did the effluent leaving this tank. The high flows continue to wash solids out of the clarifier, onto the sand filters.
2. Aeration appeared to be adequate and one sludge return was operating. There is no skimmer in the clarifier.
3. The clarifier tank effluent weir does not have an adequate baffle to keep bulking sludge from discharging. An effluent baffle should be provided.
4. Solids washing out of the WWTP to the sand filters continue to result in ponding water and septic conditions. The west filter bed had several inches of water ponding, which was septic with bulking, floating black sludge. The water in the east bed was observed to be black and septic, with a large concentration of solids. Mr. Zitter indicated that the ongoing rain events make it difficult to dry out the filter beds for cleaning.
5. The contents of the chlorine contact tank were dark grey in color with a murky appearance.
6. One chlorine tablet was observed in one of the four tablet chlorination feed tubes.
7. There was no dechlorination provided, as all of the dechlorination feed tubes were empty at the time of inspection.

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8. Mr. Zitter suggested that the chlorination and dechlorination tablets were being used up at a faster rate due to the ongoing high flows through the WWTP. Whatever the reason, tablets must be in the feeders between May 1st and October 31st.
9. Previously, the need to replace the sand filter bed media was discussed. Please refer to our previous letter dated September 19, 2012, for filter sand requirements.
10. Entries in the operator log book for this year include frequent notations indicating "*plant washed out*" and "*filters flooded need to be pumped off/out*".
11. Flows are to be reported daily as required by the National Pollutant Discharge Elimination System (NPDES) permit. No flow data was reported on the discharge monitoring reports (DMRs) for the months of February 2013 or June 2013.
12. Pictures taken at the time of the inspection are enclosed.

Operator Log Requirements

Ohio Administrative Code (OAC) Rule 3745-7-09 includes the recordkeeping requirements and responsibilities of a certified operator. The log book must be an up to date record of wastewater system operations and maintenance, which contains at a minimum, the following information:

- Identification of the sewerage system, or treatment works;
- Date and times of arrival and departure for the operator of record;
- Specific operation and maintenance activities that affect or have the potential affect the quality or quantity of sewage received and/or effluent produced;
- Results of tests performed and samples taken, unless documented on a laboratory benchsheet;
- Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced;
- and Identification of the persons making entries.

The records must be kept up to date, contain a minimum of three months data at all times, and be maintained on site for at least three years. Adequate operator logs are not being maintained.

OAC Chapter 3745-7-09: Operator Certification for Public Water Systems and Wastewater Treatment Works is available at: <http://www.epa.state.oh.us/ddagw/rules.aspx>.

NPDES Permit Compliance Schedule (2PY00032*BD):

As previously indicated, the NPDES permit for this facility includes the following compliance schedule items that were to have been submitted but not yet received:

- *5/1/2008 – Submit a sewer system evaluation survey and sanitary sewer infiltration/inflow (I/I) analysis. Items to be included in the I/I analysis are specified in the permit.*

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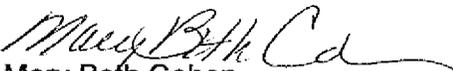
- *11/1/2008 – Submit detail plans and a PTI for sewer system improvements necessary to implement the recommendations of the study to reduce the volume of Infiltration/Inflow entering the collection system.*

Review of your self-monitoring reports for the six month period ending in July 2013 indicates that you were in significant non-compliance (SNC) with the Nitrogen, Ammonia (NH₃) and Total Suspended Solids effluent limitations contained in your NPDES permit. A facility becomes SNC when it exceeds the effluent limit for four or more months in two consecutive quarters or exceeds the effluent limit significantly in any two months in two consecutive quarters.

Enclosed is a list of violations for this facility for the period of May 2012 through July 2013.

If there are any questions, please contact me at 419-373-3014.

Yours truly,


Mary Beth Cohen
Division of Surface Water

/jlm

Enclosures

pc: Tony Zitter, Park Manager - Poplar Village MHP
Christina Douglas, Uni-Tech Environmental Services, Inc.

ec: Tom Poffenbarger, DSW, NWDO
Martha Horvitz, Legal, CO
Laura Wallrabenstein, Seneca County General Health District
Ohio EPA Inspection Tracking

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PY00032	OH0126497	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
07/09/2013	11:30 AM	12:30 PM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Poplar Village MHP 12400 W. Axline St Fostoria, OH 44830	5/1/2007
	Permit Expiration Date
	4/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Carl "Tony" Zitter, Manager	419-559-4696
Name and Title of Responsible Official	Phone Number
HAP III, LP Russell Hinds, Owner Robert Merchant, contact	512-330-9437
	419- 215-1536

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Compliance schedule not met
U	Operations & Maintenance	Ongoing operational issues
M	Facility Site Review	
N	Collection System	Needs to be evaluated as per the NPDES schd
U	Flow Measurement	Not reporting daily flow values on eDMR's
M	Receiving Waters	
N	Laboratory	

Comments: See letter

Signatures	
 Mary Beth Cohen, Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office
Date 8/22/13	Date 8/22/13

Poplar Village MHP
2PY00032 (001) Effluent Violations
May 2012 thru July 2013

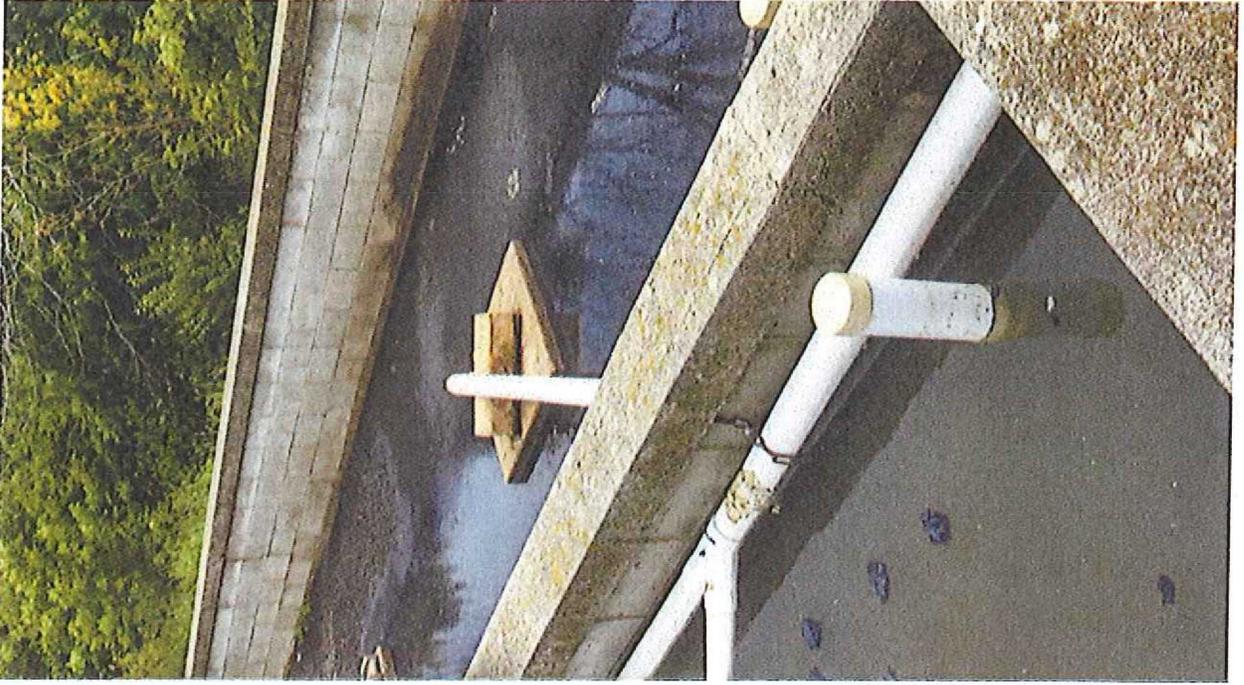
Reporting Period	Reporting		Limit Type	Limit	Reported	
	Code	Parameter			Value	Violation Date
October 2012	00530	Total Suspended Solids	1D Conc	18	20.	10/25/2012
October 2012	00530	Total Suspended Solids	30D Conc	12	20.	10/1/2012
October 2012	31616	Fecal Coliform	30D Conc	1000	1000.	10/1/2012
December 2012	00530	Total Suspended Solids	30D Conc	12	15.	12/1/2012
March 2013	00530	Total Suspended Solids	30D Qty	0.9	1.0492	3/1/2013
April 2013	00530	Total Suspended Solids	1D Conc	18	21.	4/24/2013
April 2013	00530	Total Suspended Solids	30D Conc	12	21.	4/1/2013
April 2013	00530	Total Suspended Solids	30D Qty	0.9	1.22089	4/1/2013
April 2013	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.7	4/24/2013
April 2013	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.7	4/1/2013
April 2013	00610	Nitrogen, Ammonia (NH3	1D Qty	0.30	.38952	4/24/2013
April 2013	00610	Nitrogen, Ammonia (NH3	30D Qty	0.20	.38952	4/1/2013
May 2013	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	5.27	5/29/2013
May 2013	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	5.27	5/1/2013
May 2013	00610	Nitrogen, Ammonia (NH3	1D Qty	0.11	.34468	5/29/2013
May 2013	00610	Nitrogen, Ammonia (NH3	30D Qty	0.07	.34468	5/1/2013
May 2013	31616	Fecal Coliform	1D Conc	2000	AK	5/29/2013
May 2013	31616	Fecal Coliform	30D Conc	1000	AK	5/1/2013
June 2013	00530	Total Suspended Solids	1D Conc	18	37.	6/26/2013
June 2013	00530	Total Suspended Solids	30D Conc	12	37.	6/1/2013
July 2013	00530	Total Suspended Solids	30D Qty	0.9	.93747	7/1/2013
July 2013	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	4.6	7/27/2013
July 2013	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	4.6	7/1/2013
July 2013	00610	Nitrogen, Ammonia (NH3	1D Qty	0.11	.35936	7/27/2013
July 2013	00610	Nitrogen, Ammonia (NH3	30D Qty	0.07	.35936	7/1/2013

Poplar Village MHP
2PY00032 (001) Monitoring Frequency Violations
May 2012 thru July 2013

Reporting Period	Reporting		Sample		Reported	Violation Date
	Code	Parameter	Frequency	Expected		
February 2013	00056	Flow Rate	1/Day	1	0	28 Days
May 2013	00010	Water Temperature	1/Week	1	0	5/22/2013
May 2013	00300	Dissolved Oxygen	1/Week	1	0	5/22/2013
June 2013	00056	Flow Rate	1/Day	1	0	30 Days

Poplar MHP – WWTP 07/09/2013

Pictures taken by M.B. Cohen Sand filters w/ grey septic ponding water



Poplar MHP – WWTP

Sand filters w/ grey septic ponding water



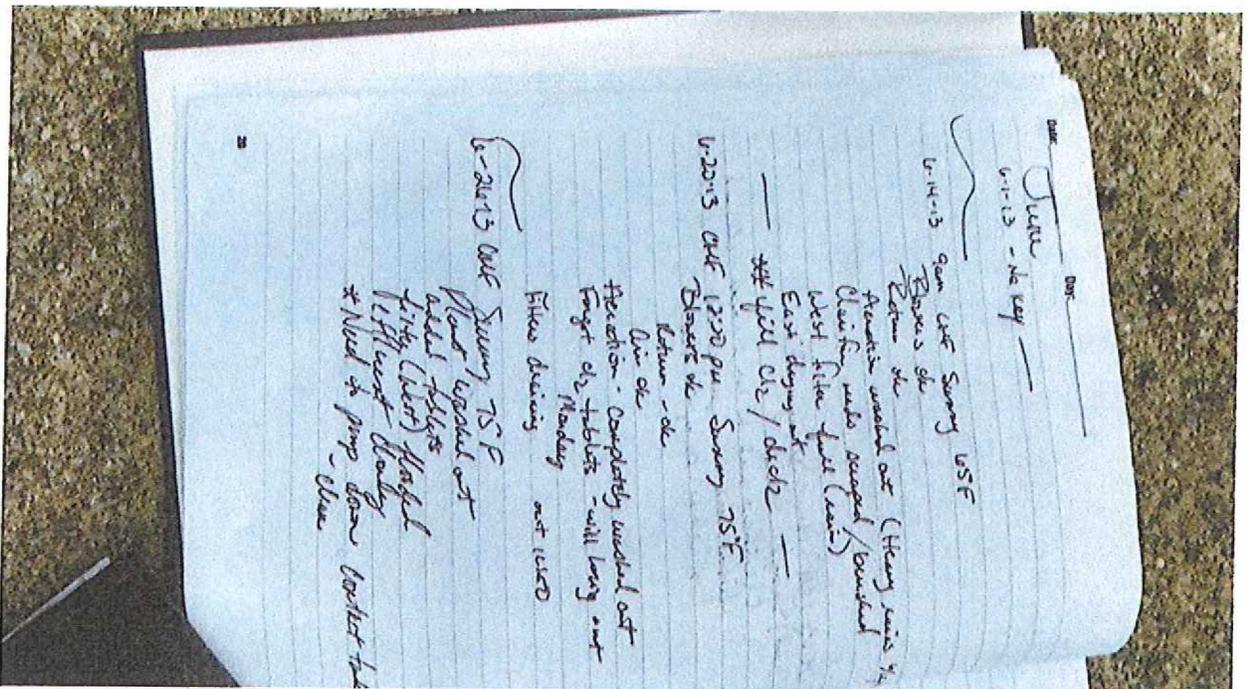
Clarifier – effluent weir w/ grey turbid discharge



Poplar MHP – WWTP
 Clarifier – effluent weir w/ grey turbid discharge



Operator log book



Poplar MHP - WWTP

Operator log book

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Date: _____ Day: _____

CMF 10:15 am 1st run 75°F
Blowers ok
return ok
air ok
Pumps ok
* Clean clarifier
* remove solids from filter
- Switch

3) CMF On Survey 78°F
Sample taken
Clarifiers need to be scraped - cleaned
filters need to be rapped off
* use sample 5/23

Date: _____ Day: _____

May
5-7-13 CMF 2pm Survey 70°F 2:30
Blowers ok
air ok
return / ~~ok~~ ok
- Need to scrape / brush clarifier
- Blower
- West filter drying out
East 4" water
Chem. ok
Effluent clean at 3pm

5-13-13 CMF 11:20 am Survey 46°F
Blowers ok
Pumps ok
air ok
return ok
Scum on clarifier * Clean
Scrape walls!
West filter drying out
East 6" water
* Need to cut grass.
Chemicals ok
Effluent clean ~~ok~~
- need to cut back to
to get to effluent line

18

Date _____
 3-6-13 11:45 AM - Off Pump 30°F
 Please watch at
 ✓ 1st filter on north of Hous
 due to heavy rain last night
 & had to make up rain - get them fixed
 so they can dry off
 2nd filter on south
 on highway side
 3-21-13 11:20 AM 21°F Pump 11:25
 Bypass the same old - on the
 Pump the
 reaction worked at
 East filter flooded
 - pump down in
 vent to plant
 & putting pump on
 4-2
 4-3
 4-4
 2-13 08:45 AM 49°F
 Bypass the
 pumps the
 filters had to lay out
 water at the
 Sample

Date _____
 5-13 08:15 11:30 AM
 Filters (both flooded) need to pump down
 Bypass the - can pool
 Pumps the
 Return the
 Effluent good 1 out 9 in
 2-13 11:30 AM
 Plant worked at
 Bypass the
 submersible at
 piece of old
 - need to pump
 & take it try
 2-13 - stopped out - no keys (Monday)
 2-13 1:20 PM 1:45 PM 3:00 PM
 Bypass the
 Pumps the
 reaction worked at
 when the
 filters for the flooded
 - call hands to pumps +
 can call they out
 Sample