



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

August 28, 2013

RE: GEAUGA COUNTY
HAMB DEN TWP.
TERRACE GLEN ESTATES
NPDES #3PR000156

Mr. Dan Ledenican
Terrace Glen Estates
13491 Woodin Road
Chardon, Ohio 44024

NOTICE OF VIOLATION

CERTIFIED LETTER

Dear Mr. Ledenican:

On August 22, 2013, this writer met with you to conduct an inspection of the sewerage treatment system serving the Terrace Glen Estates Mobile Home Park (MHP). The intent of the inspection was to observe the operations and maintenance of the treatment system and review compliance with the National Pollutant Discharge Elimination System (NPDES) permit.

The wastewater treatment system consists of a trash trap, 20,000 gpd extended aeration treatment plant, flow equalization tank, sludge holding tank, dosing station, surface sand filters, chlorination and dechlorination.

NPDES PERMIT COMPLIANCE

The Directors Final Findings and Orders, issued May 8, 2001, required the facility to initiate a Sanitary Sewer Evaluation Study (SSES) within (1) month of the effective date of the Orders. It is understood the SSES was completed and the report was submitted to our office. The results of the SSES were the sanitary sewer system is in need of repairs to stop the wet weather inflow. All of the SSES recommendations have not been initiated at the facility. It is understood the facility has regouted the manholes. The schedule you submitted to our office on December 19, 2001 indicated the following items would be completed according to this timeline:

Waterproof all manhole castings and seal the inside of all manholes	July 2002
Replace or repair the sewer line between MH 6 and MH 7	Sept. 2002
Grout, test and seal sewer lines where needed Phase 1	July 2003
Grout, test and seal sewer lines where needed Phase 2	July 2004
Grout, test and seal sewer lines where needed Phase 3	July 2005

The above noted items were not completed in the above noted timelines and therefore, a compliance schedule was included in the NPDES permit which has an effective date December 1, 2010. The compliance schedule requires you to implement the SSES findings within a

certain timeframe. More specifically, the compliance schedule in the active NPDES permit contains the following:

- a) Replace or repair the sewer line between Manhole 6 and Manhole 7, as soon as possible but no later than June 1, 2011 (expired).
- b) Grout, test and seal sewer lines where needed, Phase 1, as soon as possible but no later than 40 months from the effective date of the permit, which is April 1, 2014.
- c) Grout, test and seal sewer lines where needed, Phase 2, as soon as possible but no later than 60 months from the effective date of the permit, which is November 30, 2014.
- d) Submit written status reports to NEDO every six months beginning June 1, 2011.

To date, this office has not received any notifications from Terrace Glen Estates which indicate any of the above noted work was completed. During the inspection, you indicated Lake County Sewer Co., Inc. completed work in June 2013 that included cleaning, televising, testing and sealing some sewer runs in the mobile home park. More specifically, you indicated the work included televising some areas where it was suggested most inflow and infiltration is entering the system, repairing water leaking in the lines by the dam, repairing a break in the main 8-inch collection line and lining and grouting this sewer segment. You indicated future work to be completed includes relining and sealing all manholes, grouting all the joints. To date, this office has not received a summary report of all the work completed in the collection system this past summer or cumulative since 2010.

Because this office has not received any compliance updates during the entire NPDES permit cycle, the mobile home park has failed to meet any of the above noted compliance milestones. As such, the Terrace Glen Mobile Home Park is in violation of Part II of the NPDES permit and is subject to further enforcement action by this Agency should the noncompliance continue. The Terrace Glen Mobile Home Park must submit all the summary reports for the work completed in the collection system. This information must be submitted to this office as soon as possible but no later than September 29, 2013. Failure to submit this information may result in this matter being referred to our Legal Staff for an enforcement action.

According to the NPDES permit, the wastewater treatment system is listed as a Class A Wastewater Treatment system. Our records indicate Ron Bell and Josh Goodridge are the certified operators listed as the Operator of Record (ORC) for Terrace Glen Estates MHP.

VIOLATION SUMMARY

According to discharge monitoring report data reviewed for the period of December 1, 2010 through August 1, 2013, the average flow reported by the facility was 12,128 gpd. A summary of the wastewater treatment plant monitoring violations for the same review period is shown below:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	4.8	1/1/2011
January 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.20	.21983	1/1/2011
January 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.70	2.07017	1/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	0.70	.97	5/1/2011

October 2011	001	00610	Nitrogen, Ammonia (NH3	30D Conc	0.70	2.24	10/1/2011
October 2011	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.0	2.24	10/1/2011
October 2011	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.050	.09157	10/1/2011
October 2011	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.080	.09157	10/1/2011
July 2012	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.0	3.86	7/8/2012
July 2012	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.080	.18701	7/8/2012
July 2012	001	00610	Nitrogen, Ammonia (NH3	30D Conc	0.70	1.955	7/1/2012
July 2012	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.050	.09498	7/1/2012
July 2012	001	31648	E. coli	7D Conc	362	660.	7/8/2012
July 2012	001	31648	E. coli	30D Conc	161	406.201	7/1/2012
June 2013	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.0	2.44	6/1/2013
June 2013	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.080	.10344	6/1/2013
June 2013	001	00610	Nitrogen, Ammonia (NH3	30D Conc	0.70	1.365	6/1/2013
June 2013	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.050	.05841	6/1/2013

INSPECTION SUMMARY

At the time of the inspection, the wastewater treatment plant was producing what appeared to be a satisfactory quality effluent. Overall, the 20,000 gpd plant was in satisfactory operation and maintenance condition.

- 1) All treatment system components were in operation at the time of the inspection. The flow equalization tank was less than half full and the tank appeared to be provided with a satisfactory amount of air and the rollover within the tank appeared satisfactory. A slight accumulation of solids was noted in the flow equalization splitter box. Mr. Ledenican indicated these solids are removed periodically. The aeration tanks were more than half-full and contained chocolate brown colored mixed liquor. The mixing within the tank appeared to be concentrated on one end with less rollover noted in the south side of the tank (portion near the flow equalization tank). It was noted that a plugged or malfunctioning diffuser could be the cause of the low mixing noted in that portion of the aeration tank. It was later indicated that this diffuser valve was not opened far enough to allow air flow through it. It is understood this issue has since been fixed and the tank is now being supplied with adequate air. The return lines were all in operation and returning a thick concentrated solids mix. The clarifier contained some solids on the surface of the tank and some solids were visible on the sidewalls of the tank. The influent baffle contained an accumulation of solids. There were some solids noted on the effluent weir. The skimmer was visible and appeared to be set at a satisfactory depth within the tank. The effluent from the clarifier appeared clear. It is understood solids are wasted from the system when needed.
- 2) The sludge holding tank was not aerated at the time of the inspection and appeared to be about half full. Mr. Ledenican indicated the sludge holding tank air is turned on periodically. It is understood the sludge holding tank was pumped out this past spring and the trash traps are pumped out every six weeks. The dosing station was in good condition
- 3) The surface sand filter that was in use was in satisfactory condition. The sand filter media was recently replaced in two filters. The filter sand specifications were submitted to this office upon request. After review, it appears the filter sand meets

the Ohio EPA filter sand specification requirement of a uniformity coefficient not greater than 3.0 and an effective size between 0.4 and 1.0 mm.

- 4) The chlorination/dechlorination tank was intact and appeared to be in satisfactory condition. The system was providing both chlorination and dechlorination. There are chemicals stored around the tank in buckets. These chemicals must be moved indoors to an area suitable for chemical storage that also provides spill containment. In addition, the area around the sand filters and chlorination/dechlorination tank contained areas where vehicles and equipment have leaked oil. These oil leaks must be cleaned up effectively to prevent oil from running off into the receiving stream upon a rain event.
- 5) The final outfall was clear and free of any foam or odors.

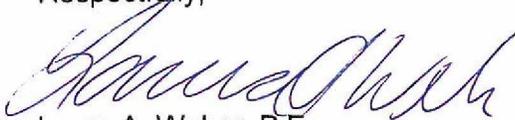
IN SUMMARY

Submit a summary report of all work completed as a status update on the SSES. The Terrace Glen Mobile Home Park is currently in violation of Part II of the NPDES permit for failing to comply with the entire compliance schedule. Due to this noncompliance, this office is prepared to refer this matter for an enforcement action. To avoid a referral you must submit a report summarizing all the work completed in the collection system which should include, but not be limited to, a work summary report from Lake County Sewer Co., Inc. **This information must be submitted within 30 days from the date of this letter (no later than September 29, 2013).**

To prevent further enforcement action to be taken by this office, you must complete the recommendations as stated in this letter within the provided timeline. If you do not believe this timeline is adequate, you must contact this office immediately to revise the dates.

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

Respectfully,



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

LAW/cs

cc: Geauga County Health Department, Att: Dave Sage

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Mr. Dan Ledenic
 Terrace Glen Estates
 13491 Woodin Road
 Chardon, Ohio 44024

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