



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

September 12, 2013

RE: MEDINA COUNTY
GUILFORD TOWNSHIP
J&M TRAILER PARK
NPDES NO. 3PR00558
CEI

Ms. Marilyn Vislasky, Owner
J & M Trailer Park
5222 Greenwich Road
Seville, Ohio 44273

CERTIFIED MAIL

Dear Ms. Vislasky:

On August 8, 2013, this writer conducted a compliance evaluation inspection (CEI) on the wastewater treatment plant (WWTP) serving the J&M Trailer Park, located at 5222 Greenwich Road, Guilford Township, Medina County.

The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to assess compliance with the effluent limits, terms, and conditions of its recently issued National Pollutant Discharge Elimination System (NPDES) Permit. The facility was issued an NPDES permit to discharge (No. 3PR00558*AD) on July 26, 2012, and was effective as of September 1, 2012.

At the time of the August 8th inspection, the following observations were made of the existing sewage system:

- 1) The trash trap contained a thick (approximately 6") mat of floating solids/scum on top of its contents, and **is in need of pumping.**
- 2) Contents of the 6,000 gpd aeration tank were medium brown in color, and were being aerated. The return sludge line was returning a lighter brown liquid from the settling tank to the aeration tank.
- 3) Contents of the settling tank portion of the WWTP were clear, but contained some floating scum and solids. There was a thick buildup of solids/scum behind the inlet baffle to the settling tank. (see photo). **The floating solids/scum needs to be removed from the settling tank, and the sides of the settling tank scraped down.**
- 4) The skimmer in the settling tank was not operating, and the settling tank effluent trough contained a slight solids deposition. Effluent leaving the settling tank was visually clear and colorless. **The solids need to be removed from the settling tank effluent trough, and the skimmer made operational.**



- 5) The WWTP does not have any type of tertiary treatment (e.g. surface sand filters), nor any type of disinfection facilities (e.g. chlorination/dechlorination, or Ultraviolet light). Construction activity on any tertiary or disinfection facilities was not observed.

The NPDES permit, which went effective on September 1, 2012, contains both an interim and final effluent limit table for the WWTP, as well as a compliance schedule for constructing improvements at the WWTP. The improvements will enable the WWTP to meet effluent limits contained within the permit.

The compliance schedule deadlines contained within the NPDES permit are as follows:

- a) ***Submit detail plans not later than December 1, 2012, for WWTP improvements to meet final effluent limits.***
- b) ***Commence construction of WWTP improvements by March 1, 2013.***
- c) ***Complete construction of WWTP improvements by June 1, 2013.***
- d) ***Attain operational level and meet final effluent limits by December 1, 2013.***

Please be advised that, **as of the date of this correspondence, the detail plan submittal for WWTP improvements is past due (December 1, 2012), as are the commencement of construction of WWTP improvements (due March 1, 2013), and the construction completion of WWTP improvements (June 1, 2013).**

Failure to meet NPDES permit Compliance Schedule dates is considered a violation of your NPDES permit, and is subject to Ohio EPA enforcement action. **Detail plans for WWTP improvements must be submitted to the Ohio EPA within 30 days of the receipt of this correspondence.**

A search for the operating data for the WWTP was conducted prior to the inspection. The electronic Discharge Monitoring Report (eDMR) data covered the period of September 1, 2012 (NPDES permit effective date) through August 1, 2013.

Monthly eDMR reports have been submitted to the Ohio EPA, starting with the September 2012 reporting period. However, not all of the data required by the NPDES has been submitted in those monthly reports.

Please be advised that non-reporting of required parameters is also a violation of the NPDES permit, and is also subject to enforcement action by the Ohio EPA.

A review of the data base for your facility lists the Certified Operator(s) of Record (ORC) for the J&M Trailer Park WWTP as Messers. Tim Kettler (Class 1 wastewater operator), and Malcom Kettler (Class A wastewater operator). Their ORC notification form was submitted to the Ohio EPA on September 4, 2012.

Please inform this office in writing, within seven days of the receipt of this correspondence, as to the status of the required WWTP improvements. **Failure to respond to this request for submittal of detail plans for the WWTP upgrade will result in referral to Columbus for legal enforcement action.**

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Improved operation and maintenance practices need to be implemented, which will enable the J&M Trailer Park WWTP to continuously meet its NPDES Permit effluent limits. **Those items outlined above in bold text need to be addressed immediately.**

Should you have any comments or questions regarding this letter, please contact this office.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/cs

cc: Steve Mazak, Medina County Health Department