



Re: **Notice of Violation**
Richland County
Clear Fork MHP
NPDES Permit

October 7, 2013

Mr. Russ Petralia
Ashford Mansfield LLC
501 Main Street
P.O. Box 4969
Utica, New York 13501

Dear Mr. Petralia:

On September 12, 2013, an inspection was made of the wastewater treatment facilities serving the Clear Fork Mobile Home Park (MHP) located at 1260 State Route 97, Bellville, Richland County. The inspection included a check of both the east and west extended aeration package plants.

At the time of the inspection, the blowers to both the east and west plants were operating. The clarifier in the west plant appeared fairly clear. The clarifier in the east plant was fairly turbid. Air could be seen bubbling up around the eastern RAS return pipe in the clarifier. It is possible the return line is either partially plugged or that the pipe has begun to develop holes, which is allowing air to escape. The integrity of this pipe should be checked. The certified operator's log book was reviewed and found to be adequate.

A review of the Discharge Monitoring Reports (DMRs) submitted to our office for the period of December 2012 through September 2013 revealed numerous **violations** of the limits contained in the National Pollutant Discharge Elimination System (NPDES) permit. A printout of these **violations** has been included for your review. These continued **violations** underscore the need to complete the improvements required in the NPDES permit and the Director's Final Findings and Orders (DFFOs). The review also indicated that while the daily checks of the plant operations by the park staff have improved, there were still several days that information was not recorded as required by the NPDES permit. These are called frequency **violations**. A printout of these **violations** has been included for your review as well.

Two milestone dates contained in the DFFOs have passed without completion on your part. Easements for the effluent line were to have been completed by May 1, 2013, and construction of the upgrades begun no later than September 1, 2013. Our office has been in contact with you regarding the easement and the difficulties you have had in obtaining a legal agreement from Mr. Swank the property owner. Our office met with Mr. Swank on September 17, and it

Mr. Russ Petralia
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appears that he is unwilling to grant you an easement. We suggest that you begin to investigate other routes for the effluent line to reach waters of the state. In order to allow for this investigation, we propose to modify the milestones in the DFFOs as follows:

- 1) Modify Order No.2 to require easements in place no later than February 1, 2014.
- 2) Modify Order No.3 to require construction to begin no later than November 1, 2013, on the upgrades to the wastewater treatment plant (WWTP) and the effluent pump station. Construction of the majority of the upgrades can begin prior to installation of the force main. At the very least, a contract with a construction company should be signed and equipment ordered.
- 3) Addition of a new Order requiring that a Permit to Install (PTI) application be submitted no later than March 1, 2014, if a new location is needed for the effluent force main and/or changes are needed to the effluent pump station that differ from the previously approved PTI.
- 4) No changes will be made to Order No.4, and all construction will need to be completed no later than June 30, 2014.

Please notify me by November 1, 2013, as to the status of your investigation to find another route for the sewer force main. If it appears that your investigation will be successful, Ohio EPA will prepare modified DFFOs with the schedule set out above, and send them to you for your review and signature. Please note that you should start construction as soon as possible but no later than November 1, 2013, whether or not the DFFOs have been modified yet, since you are in violation of the currently effective Orders by not commencing construction by September 1, 2013.

If you have questions, please contact me at 419-373-3070.

Sincerely,



Walter Ariss, P.E.
Environmental Specialist II
Division of Surface Water

/jlm

Enclosures

pc: Kevin Dean, Dean's Backflow Service

ec: Martha Horvitz, DSW Legal

Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 150,000 GPD

NPDES Permit No. 2P500024

Facility Name Clear Fork MHP Expiration Date 7/31/2016

Facility Location 1260 SR 97 Date 9/12/13 Time 10:30 am

City Bellville County Richard Township _____

Name of Owner Ashford Mansfield Owner Phone _____

Person Contacted Russ Petralia Operator of Record Kevin Dean

Flow: Design Two 15000 GPD WWTP Classification: A or X1

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 66° - light rain

OEPA Personnel Walter Aris District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	Turbidity	Odor	Color
0	None	Clear	None	Colorless
1	Mild			
2	Moderate	Light Solids	Musty	Grey
3	Serious			
4	Extreme	Heavy Solids	Septic	Black

2. Effect of Effluent on Receiving Stream Name: Leaching Lagoures

No.	Severity Description	Turbidity	Odor	Color
0	None	Clear	None	Colorless
1	Mild			
2	Moderate	Light Solids	Musty	Grey
3	Serious			
4	Extreme	Heavy Solids	Septic	Black

3. a. Plant has _____ excellent _____ good _____ fair _____ poor operation
 b. Plant has _____ excellent _____ good _____ fair _____ poor maintenance
 c. Sand filters have _____ excellent _____ good _____ fair _____ poor maintenance N/A

d. Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) _____

Disinfection: (Required May 1 thru Oct. 31)

IN	OUT
<u>None</u>	_____
_____	_____
_____	_____

Chlorination Tablets
 Dechlorination Tablets
 Ultraviolet (U.V.)

Yes No

4. X Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____

Chronic Violations X all parameters

5. X O & M logbook kept and available on site: Location blower house @ east plant

6. X Staffing Requirement Met (Class A - 2 days per week for minimum 1 hour per week)
 (Class I - 3 days per week for minimum 1.5 hours per week)

7. X Adequate Plant Safety: Deficiencies _____

Facility Name: Clear Fork MHP

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	X	Trash Trap	Pumping Frequency ?
		Grease Trap	Pumping Frequency
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment	X	Plant Timer <u>X</u> <u>Y</u> <u>N</u> Motor / Blower Unit <u>running</u>	Cycle Time: <u>appears adequate</u>
Secondary Treatment	X	Aeration Tank	Color: <u>good color</u> Adequate Aeration <u>Y</u> <u>N</u>
Final Settling	X	Clarifier <u>west clarifier</u> <u>okay</u>	<u>east clarifier turbid</u> <u>check for bleed pipe or holes</u>
	X	Sludge Return	In <u>X</u> Out
	X	Surface Skimmer	In <u>X</u> Out
		Fixed Media Clarifier	
Tertiary Treatment		Surface Sand Filter	
		Polishing Pond	
		Other	
<u>none</u>			
Disinfection		Contact Tank	
		Chlorine Tube Feeder	
		Dechlorination Tube Feeder	
		Ultraviolet (UV)	
<u>none</u>			
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
<u>none</u>			
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
<u>none</u>			
Sludge Handling		Aerated Storage Tank	
		Sludge Drying Bed	
<u>none</u>			
Sludge Disposal	X	Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment		Post Aeration	
		Spray Irrigation	
		Other	
<u>none</u>			

Get New Data

Clear Fork MHP NPDES frequency violations December 2012 through September 2013

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/4/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/6/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/11/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/13/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/18/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/20/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/24/2012
2PY00024*BD	December 2012	001	01350	Turbidity, Severity	1/Day	1	0	12/30/2012
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/2/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/4/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/8/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/10/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/15/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/17/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/22/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/24/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/29/2013
2PY00024*BD	January 2013	001	01350	Turbidity, Severity	1/Day	1	0	1/31/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/5/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/7/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/12/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/14/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/19/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/21/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/26/2013
2PY00024*BD	February 2013	001	01350	Turbidity, Severity	1/Day	1	0	2/28/2013
2PY00024*BD	March 2013	001	00530	Total Suspended Solids	1/2Weeks	1	0	3/15/2013
2PY00024*BD	March 2013	001	00610	Nitrogen, Ammonia (NH3	1/2Weeks	1	0	3/15/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/5/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/7/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/12/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/14/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/18/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/20/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/26/2013
2PY00024*BD	March 2013	001	01350	Turbidity, Severity	1/Day	1	0	3/28/2013
2PY00024*BD	March 2013	001	80082	CBOD 5 day	1/2Weeks	1	0	3/15/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/2/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/4/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/9/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/11/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/16/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/18/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/23/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/25/2013
2PY00024*BD	April 2013	001	01350	Turbidity, Severity	1/Day	1	0	4/30/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/2/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/7/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/9/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/14/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/16/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/21/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/23/2013
2PY00024*BD	May 2013	001	01350	Turbidity, Severity	1/Day	1	0	5/29/2013

2PY00024*BD	May	2013	001	01350	Turbidity, Severity	1/Day	1	0	5/31/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/4/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/6/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/11/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/13/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/17/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/20/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/25/2013
2PY00024*BD	June	2013	001	01350	Turbidity, Severity	1/Day	1	0	6/27/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/2/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/5/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/9/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/12/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/16/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/17/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/23/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/25/2013
2PY00024*BD	July	2013	001	01350	Turbidity, Severity	1/Day	1	0	7/30/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/1/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/6/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/8/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/9/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/13/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/15/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/19/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/22/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/27/2013
2PY00024*BD	August	2013	001	01350	Turbidity, Severity	1/Day	1	0	8/29/2013

Get New Data

Clear Fork MHP NPDES permit limit violations December 2012 through September 2013

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PY00024*BD	December 2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.12	12/3/2012
2PY00024*BD	December 2012	001	00300	Dissolved Oxygen	1D Conc	5.0	3.71	12/10/2012
2PY00024*BD	December 2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.16	12/17/2012
2PY00024*BD	December 2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.64	12/26/2012
2PY00024*BD	December 2012	001	00530	Total Suspended Solids	30D Conc	12.0	27.5	12/1/2012
2PY00024*BD	December 2012	001	00530	Total Suspended Solids	7D Conc	18.0	55.	12/22/2012
2PY00024*BD	January 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.89	1/3/2013
2PY00024*BD	January 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.24	1/9/2013
2PY00024*BD	January 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.87	1/16/2013
2PY00024*BD	January 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.5	1/23/2013
2PY00024*BD	February 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.3	2/4/2013
2PY00024*BD	February 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.93	2/8/2013
2PY00024*BD	April 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.29	4/1/2013
2PY00024*BD	April 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.51	4/8/2013
2PY00024*BD	April 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.32	4/15/2013
2PY00024*BD	April 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.59	4/22/2013
2PY00024*BD	May 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.21	5/6/2013
2PY00024*BD	May 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.96	5/15/2013
2PY00024*BD	May 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.27	5/22/2013
2PY00024*BD	May 2013	001	00530	Total Suspended Solids	7D Conc	18.0	19.	5/8/2013
2PY00024*BD	May 2013	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.97	5/8/2013
2PY00024*BD	May 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.524	5/1/2013
2PY00024*BD	May 2013	001	31648	E. coli	30D Conc	126	184.	5/1/2013
2PY00024*BD	June 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.62	6/18/2013
2PY00024*BD	June 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.74	6/24/2013
2PY00024*BD	June 2013	001	00530	Total Suspended Solids	30D Conc	12.0	85.	6/1/2013
2PY00024*BD	June 2013	001	00530	Total Suspended Solids	7D Conc	18.0	170.	6/15/2013
2PY00024*BD	June 2013	001	80082	CBOD 5 day	30D Conc	10.0	13.5	6/1/2013
2PY00024*BD	June 2013	001	80082	CBOD 5 day	7D Conc	15.0	22.	6/15/2013
2PY00024*BD	July 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.12	7/1/2013
2PY00024*BD	July 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.81	7/8/2013
2PY00024*BD	July 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.84	7/15/2013
2PY00024*BD	July 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.77	7/22/2013
2PY00024*BD	July 2013	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.23	7/8/2013
2PY00024*BD	July 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.174	7/1/2013
2PY00024*BD	August 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.53	8/5/2013
2PY00024*BD	August 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	3.67	8/12/2013
2PY00024*BD	August 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.09	8/20/2013
2PY00024*BD	August 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.03	8/26/2013
2PY00024*BD	August 2013	001	31648	E. coli	30D Conc	126	1500.	8/1/2013
2PY00024*BD	August 2013	001	31648	E. coli	7D Conc	284	1500.	8/15/2013