



**Environmental
Protection Agency**

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

October 17, 2011

RE: TRUMBULL COUNTY
VIENNA TOWNSHIP
MIDWAY MOBILE HOME PARK
NPDES PERMIT NO. OH0102865
OHIO EPA PERMIT NO. 3PV00069

Mr. Ernest Norton, Jr.
Midway Mobile Homes LLC
1062 State Route 193
Vienna, OH 44423

Ms. Beverly Norton-Grant
3656 Torrie View Court
San Diego, CA 92130

Dear Mr. Norton and Ms. Norton-Grant:

On October 12, 2011, Ohio EPA conducted an inspection of the wastewater treatment system at the above-referenced facility. Access to the treatment system was granted by Mr. William Rice. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

We understand that the partners in Midway Mobile Homes, LLC are currently awaiting a final written judgment from the Court of Common Pleas regarding the ownership of the mobile home park. Agency records currently list Mr. Larry Norton as the delegated facility representative. Please provide an updated notification to this office upon entry of the court judgment.

The wet-stream treatment components consist of preliminary treatment (trash trap), 20,000 gpd extended aeration activated sludge treatment process, final settling tank, tertiary sand filtration, chlorine disinfection, and dechlorination. Sludge handling consists of an aerated sludge holding tank. Treated effluent is discharged to an unnamed tributary of the South Branch of Yankee Run.

At the time of the inspection, the following observations and/or deficiencies were noted:

1. The general operation and maintenance of the treatment plant appeared to be satisfactory. The final effluent appeared to be clear, and was causing no immediately observable, adverse impacts to the receiving stream.
2. There was no visit/maintenance log book on site. Bound and numbered log books should be kept on site as a means to record all site visits by maintenance and operating personnel. Any and all work or maintenance done at the plant as well as

readings taken should be recorded in these log books, along with the times of arrival and departure, and the maintenance personnel initials. Loose sheets are not acceptable as the sole means of recording site activities.

3. Vegetation was observed in the sand filter distribution box. Please make sure that the box is cleaned and maintained on a regular basis.
4. The sand filter walls are in need of rehabilitation or repair.
5. Heavy weed growth was observed in the sand filters. Please keep the sand filters clean, raked, and graded level to ensure proper dissipation of wastewater.
6. The overflow pipes in the sand filters are not an OEPA-approved design modification, and must be removed immediately.
7. Neither chlorination nor dechlorination tablets were observed in the disinfection tanks.
8. This office noted that the aeration tank backup blower unit does not have a belt, and therefore is not available for immediate use should the need arise. Please ensure that all primary and backup blower assemblies are maintained and kept in good working order.
9. It appears that Blower #1 may not operate independently of Blower #2. This situation should be evaluated and, if necessary, corrections implemented.
10. Vegetation, floating sludge, and scum buildup were observed in the clarifiers. Please ensure that clarifier tanks are kept as clean as possible.
11. Part II, M of the facility's NPDES permit, which went effective on March 1, 2008, requires that an outfall sign be erected no later than four (4) months after the effective date of the permit. During the inspection, no such sign was noted at the outfall.

A review of the monthly Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period July 2008 – September 2011 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2008	001	00300	Dissolved Oxygen	1D Conc	5.0	3.5	5/6/2008
February 2011	001	00400	pH	1D Conc	9.0	9.2	2/8/2011

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
April 2008	001	00083	Color, Severity	1/Day	1	0	04/02/2008
April 2008	001	01330	Odor, Severity	1/Day	1	0	04/02/2008
April 2008	001	01350	Turbidity, Severity	1/Day	1	0	04/02/2008
April 2008	001	00083	Color, Severity	1/Day	1	0	04/05/2008
April 2008	001	01330	Odor, Severity	1/Day	1	0	04/05/2008
April 2008	001	01350	Turbidity, Severity	1/Day	1	0	04/05/2008
July 2008	001	00083	Color, Severity	1/Day	1	0	07/03/2008
July 2008	001	01330	Odor, Severity	1/Day	1	0	07/03/2008
July 2008	001	01350	Turbidity, Severity	1/Day	1	0	07/03/2008
November 2008	001	00083	Color, Severity	1/Day	1	0	11/28/2008
November 2008	001	01330	Odor, Severity	1/Day	1	0	11/28/2008
November 2008	001	01350	Turbidity, Severity	1/Day	1	0	11/28/2008
September 2010	001	00083	Color, Severity	1/Day	1	0	09/08/2010
September 2010	001	01330	Odor, Severity	1/Day	1	0	09/08/2010
September 2010	001	01350	Turbidity, Severity	1/Day	1	0	09/08/2010
January 2011	001	00083	Color, Severity	1/Day	1	0	01/03/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	01/03/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	01/03/2011

We understand that Mr. William Rice handles the operation and maintenance responsibilities for the facility, and Valley Environmental Labs, Inc. performs the necessary sampling and laboratory analyses. We also understand that Valley Environmental Labs, Inc. is currently submitting the electronic DMRs (eDMRs) for the facility. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22". 40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

A person is a duly authorized representative if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

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(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

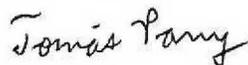
Based on the requirements outlined in 40 CFR 122.22, Valley Environmental Labs, Inc. may not submit eDMR data on behalf of Cortland Moose Lodge 1012.

Please be advised that the above-referenced violations are subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office in writing, within 10 days' receipt of this notification, as to the actions taken or proposed to address the above-referenced violations and/or deficiencies. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact this office at (330)963-1200.

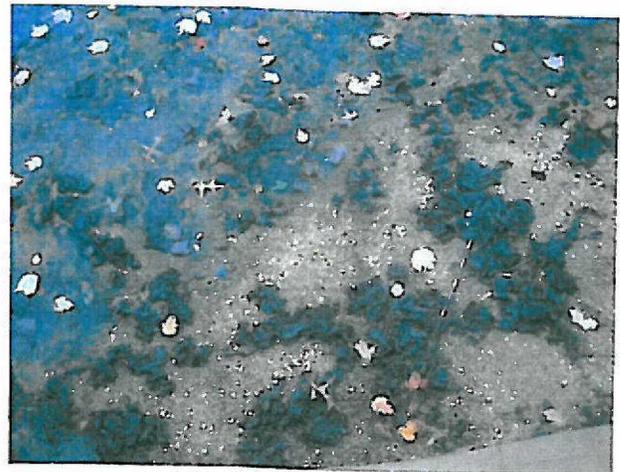
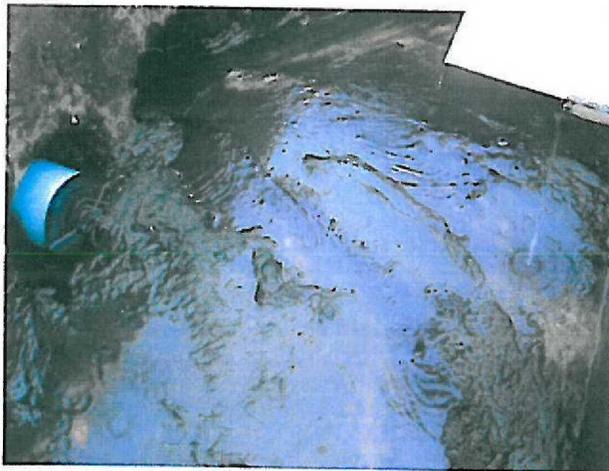
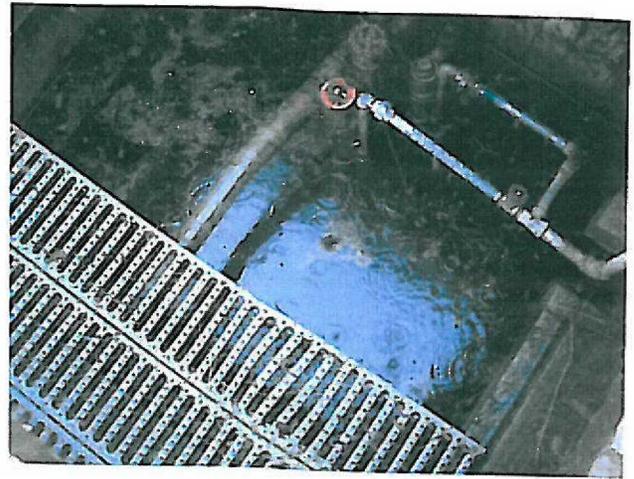
Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: photographs



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