



**Environmental  
Protection Agency**

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

October 11, 2011

RE: GENEVA MOBILE HOME PARK  
OHIO EPA PERMIT 3PV00117  
GENEVA TWP, ASHTABULA COUNTY  
INSPECTION EVALUATION FOLLOWUP

Estate of Rudolf W. Herzog, dba Geneva Trailer Park  
Mr. William R. Herzog, Executor  
P.O. Box 2300  
Ashtabula, Ohio 44005-2300

Dear Mr. Herzog:

On October 5, 2011, a follow up site inspection was conducted at the above referenced facility at 4546 North Ridge Road (U.S. Route 20), Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Mr. Gregorio Martinez, park manager, was unavailable for the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on May 12, 2011.

**Observations**

The following observations and notations were made during the inspection:

1. The plant is operated by Marlene Knopsnider and Dustin Lewis of Lewis Wastewater Services on behalf of the Estate of Rudolf W. Herzog, dba Geneva Trailer Park.
2. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. From inspection of this log, it appears that the plant was only inspected on four dates during the month of September.
3. The overall condition of the treatment plant during this inspection was not satisfactory, and the operating condition appears to have deteriorated since the last inspection.
4. The content of the aeration tank had a medium brown color, earthy odor, and good mixing. Sludge returns were a medium brown color with minimal foaming. The blowers were cycled and found in operating condition.
5. The surface of the clarifier was found full of scum. This must be removed immediately. Effluent weirs and channels need cleaned. This should be performed weekly.
6. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. Surface sand filters were noted as full of sludge. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.

8. The chlorine feeders in the chlorination tank were noted as empty. I placed a tablet into the feeder from the tub of tablets next to the tank.
9. Ohio EPA notes Mr. Martinez is the park manager and maintains the facility in conjunction with Mr. Locy and Mr. Dustin Lewis and Ms. Marlene Knopnsnider of Clean Streams, Inc. Mr. Lewis and Ms. Knopnsnider of Clean Streams, Inc. are now the designated operators of record, assuming their duties on July 15, 2010.
10. Samples are collected by Lewis Wastewater Services, who perform on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity. Mr. Martinez also records daily readings of odor, color, and turbidity.
11. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
12. Mr. Lewis submits the data to Ohio EPA's electronic Discharge Monitoring Report (eDMR) system on behalf of Geneva Trailer Park.

#### **NPDES Permit Compliance Review**

A review of the eDMR received by Ohio EPA for the period April 1, 2011, through September 1, 2011, indicates the following apparent noncompliance of the terms and conditions of your NPDES permit:

#### **Limit Violations**

No effluent limit violations are noted for the time period reviewed.

#### **Reporting Violations**

No reporting code or reporting frequency violations are noted for the time period reviewed.

#### **Other NPDES Violations**

The following additional NPDES permit violations are noted:

**Failure to Accurately Report Annual Sludge Removal:** Ohio EPA notes that Part II, Item K of your NPDES permit requires you to submit a report no later than January 31<sup>st</sup> summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report is required even if no sludge was removed the previous calendar year. Ohio EPA's files reflect that Geneva Trailer Park has never removed sludge from this facility since the NPDES permit was issued in 2005, which is inconsistent with observations made at this facility. Please revise the reports and resubmit to Chris Moody of this office as prescribed by your NPDES permit.

**Licensed Operator Inspection Frequency:** From examination of the log book maintained at the site, the plant was inspected by your licensed operator only four (4) times during the month of September 2011. The plant must be inspected at a minimum of twice weekly.

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Compliance Schedule

Ohio EPA notes the following regarding your compliance schedule contained within your NPDES permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
04/1/2011	3/31/2016	4/1/2012		95999	Other	E Coli Status Report
4/1/2011	3/31/2016	4/1/2012		-----	Other	E Coli PTI if Needed
4/1/2011	3/31/2016	10/1/2012		05699	Other	Achieve Final Limits

As milestones have been completed, no response is needed.

***Please inform this office, in writing, within 30 days of the date of this letter as to the actions that will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.***

Should you have any comments or questions concerning this letter, please feel free to call me at (330)963-1175.

Respectfully,

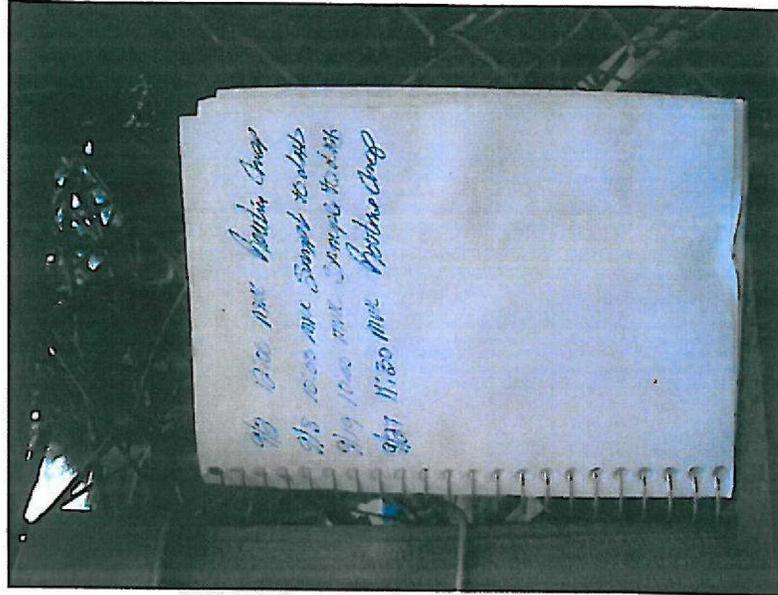


John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

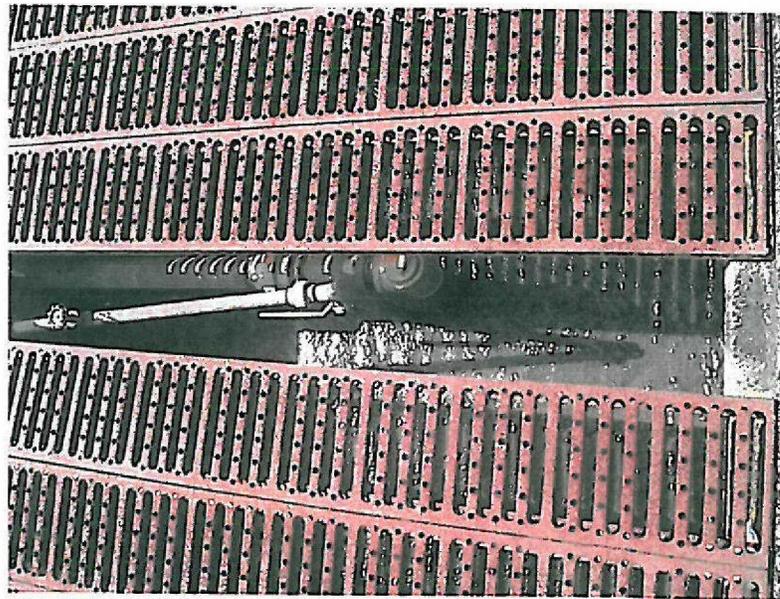
JMS/cs

cc: Mr. Michael B. Locy, A & C Mobile Homes Inc.  
Mr. Dustin Lewis, Clear Stream, Inc.

File: Semipublic/Ashtabula/Geneva Twp/Geneva Trailer Park (3PV00117)



WWTP Log Book of Inspections



Scum in Clarifier