

**Environmental  
Protection Agency**

John R. Kasich, **Governor**

Mary Taylor, **Lt. Governor**

Scott J. Kally, **Director**

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October 20, 2011

RE: TRUMBULL COUNTY  
VIENNA TOWNSHIP  
FOUR SEASONS MHP  
NPDES PERMIT NO. OH0045101  
OHIO EPA PERMIT NO. 3PV00025

Mr. William Hagood  
Tri-City Mobile Homes, Inc.  
Four Seasons Mobile Home Park  
1394 State Route 193  
Vienna, Ohio 44473

Dear Mr. Hagood:

Ohio EPA (OEPA) conducted an inspection of the wastewater treatment plant at the above-referenced address on October 12, 2011. 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.

The wet-stream treatment components consist of preliminary treatment (trash trap), flow equalization basin, 35,000 gpd extended aeration activated sludge treatment process, final settling tank, upflow clarifier, surface sand filtration, and chlorination/dechlorination contact tank. Waste sludge is stored in 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 marginal. The final effluent appeared to be clear, and was causing no immediately observable, adverse impacts to the receiving stream.
2. Several of the tank gratings throughout the plant were quite corroded, and should be replaced with new, sturdy gratings.
3. Foaming was observed in one of the tanks.
4. Operation and maintenance activities should be documented in a bound and numbered log book. Loose sheets are not acceptable as the sole means of recording plant activities. Additionally, maintenance personnel shall include their arrival time, departure time, and initials with each entry.
5. Floating sludge was observed in the clarifiers.

6. The sand filter dose pump electrical box contained a large amount of ponded water inside. Please ensure that the box remains watertight to protect the electrical components contained within.
7. A leak was observed in the piping inside the sand filter dose tank when the pumps were cycled. Please see to it that this leak is repaired immediately.
8. Please ensure that proper pipe support is provided for the sand filter dose pipes to ensure that unnecessary stresses are not placed on the flexible rubber gaskets located on the distribution box.
9. A large amount of solids buildup was observed in the sand filters. Sand filters need to be regularly cleaned, weeded, raked, and leveled to ensure proper percolation of wastewater.
10. Please describe the intended use of the well located in the sand filters, which is shown in the attached photographs.
11. The overflow pipes in the sand filters are not an OEPA-approved design modification, and must be removed immediately.
12. Dechlorination tablets were not observed in the dechlorination chamber. The chlorination and dechlorination tanks should be regularly inspected to ensure the contact tablets are replenished on a consistent, as-needed basis.
13. Part II, M of the facility's NPDES permit, which went effective on August 1, 2008, requires that an outfall sign be erected no later than four (4) months after the effective date of this permit. During the inspection, no such sign was noted.

A review of the monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period, September 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
February 2009	001	00530	Total Suspended Solids	1D Conc	18	25.	2/11/2009
February 2009	001	00530	Total Suspended Solids	1D Qty	2.4	5.299	2/11/2009
February 2009	001	00610	Nitrogen, Ammonia (NH <sub>3</sub> )	30D Conc	8.7	9.19	2/1/2009
February 2009	001	80082	CBOD 5 day	1D Qty	2.0	2.54352	2/11/2009
February 2011	001	80082	CBOD 5 day	1D Conc	15	19.	2/14/2011
March 2011	001	00530	Total Suspended Solids	1D Conc	18	23.	3/7/2011
March 2011	001	00530	Total Suspended Solids	1D Qty	2.4	4.2657	3/7/2011
March 2011	001	80082	CBOD 5 day	30D Conc	10	10.85	3/1/2011
March 2011	001	80082	CBOD 5 day	1D Qty	2.0	2.41105	3/7/2011
March 2011	001	80082	CBOD 5 day	1D Qty	2.0	2.11582	3/14/2011
March 2011	001	80082	CBOD 5 day	30D Qty	1.4	1.40707	3/1/2011

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August 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	3.21	8/17/2009
September 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	20.5	9/28/2009
September 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	10.675	9/1/2009
September 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.40	1.0863	9/28/2009
September 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.30	.55441	9/1/2009
December 2008	001	80082	CBOD 5 day	1D Conc	15	16.	12/1/2008
March 2009	001	80082	CBOD 5 day	1D Conc	15	16.	3/2/2009
September 2010	001	31616	Fecal Coliform	30D Conc	1000	1400.	9/1/2010
November 2010	001	00530	Total Suspended Solids	1D Conc	18	20.	11/29/2010
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	7.4	5/2/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	5.16	5/31/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	4.82	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.40	.633	5/2/2011
April 2011	001	00530	Total Suspended Solids	1D Conc	18	24.	4/4/2011
April 2011	001	00530	Total Suspended Solids	1D Qty	2.4	4.81452	4/4/2011
April 2011	001	00530	Total Suspended Solids	30D Qty	1.6	1.85087	4/1/2011
April 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	13.0	17.7	4/4/2011
April 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	8.7	14.15	4/1/2011
April 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	1.73	3.55071	4/4/2011
April 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	1.16	2.45741	4/1/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	3.12	6/7/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	4.81	6/13/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.965	6/1/2011
June 2011	001	31616	Fecal Coliform	1D Conc	2000	9700.	6/13/2011
June 2011	001	31616	Fecal Coliform	30D Conc	1000	9700.	6/1/2011

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2008	001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	10/15/2008
October 2008	001	00530	Total Suspended Solids	1/Week	1	0	10/22/2008

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October 2008	001	80082	CBOD 5 day	1/Week	1	0	10/22/2008
December 2008	001	00010	Water Temperature	1/Day	1	0	12/31/2008
December 2008	001	00083	Color, Severity	1/Day	1	0	12/31/2008
December 2008	001	01330	Odor, Severity	1/Day	1	0	12/31/2008
December 2008	001	01350	Turbidity, Severity	1/Day	1	0	12/31/2008
September 2009	001	00530	Total Suspended Solids	1/Week	1	0	09/01/2009
September 2009	001	80082	CBOD 5 day	1/Week	1	0	09/01/2009
September 2009	001	00400	pH	1/Week	1	0	09/01/2009
September 2009	001	00300	Dissolved Oxygen	1/Week	1	0	09/01/2009
June 2011	001	50050	Flow Rate	1/Day	1	0	06/02/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/03/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/04/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/05/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/06/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/07/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/08/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/09/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/10/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/11/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/12/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/13/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/14/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	06/15/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/15/2011
June 2011	001	80082	CBOD 5 day	1/Week	1	0	06/15/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/16/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/17/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/18/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/19/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/20/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/21/2011
June 2011	001	50050	Flow Rate	1/Day	1	0	06/22/2011

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June	2011	001	50050	Flow Rate	1/Day	1	0	06/23/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/24/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/25/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/26/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/27/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/28/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/29/2011
June	2011	001	50050	Flow Rate	1/Day	1	0	06/30/2011
August	2011	001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	08/15/2011

Based on the review of the eDMR data, and on the findings of the inspection, the facility is considered to be in **significant non-compliance** with the terms and conditions of its NPDES permit, and thus 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 14 days' receipt of this notification, as to the actions taken or proposed to address the above-mentioned violations and/or deficiencies. Your response shall include specific dates for initiation and completion of this action plan. 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,



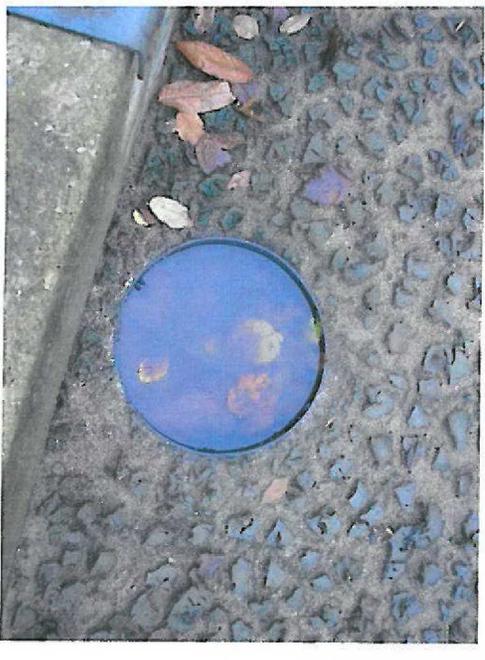
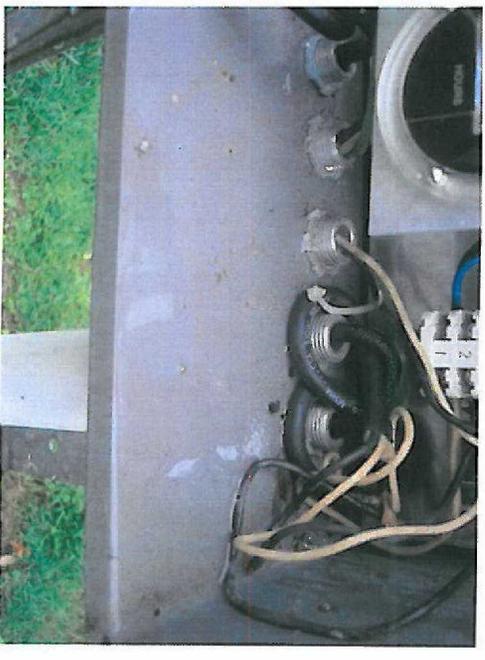
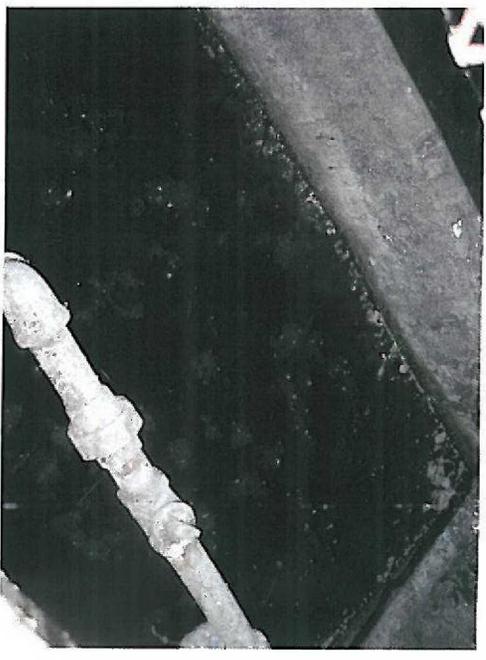
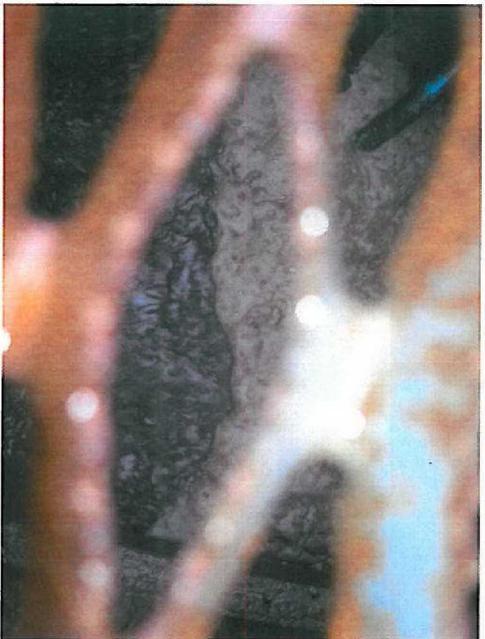
Tomás Parry  
Environmental Engineer  
Division of Surface Water

TP/cs

Attachments: photographs

cc: Scott Mascioli

File: Semipublic/Trumbull County/Vienna Twp./Four Seasons MHP



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