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OhioEPA

State of Ohio Environmental Protection Agency

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STREET ADDRESS:

Central District Office

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Columbus, Ohio 43215

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www.epa.state.oh.us

P.O. Box 1049  
Columbus, OH 43216-1049

**Certified Mail #91 7108 2133 3932 4449 2643**

December 9, 2010

Mr. James H. Croston, Jr.  
72046 Cooper Road  
Wilkesville, OH 45695

Dear Mr. Croston:

It was good to see that work appeared to be complete for installation of the wastewater treatment plant (WWTP) serving your El Rancho Mobile Home Park (MHP) in Licking County, Mary Ann Township, Ohio. However, additional work is necessary to provide consistent wastewater discharge permit compliance.

Attached is a report regarding a Reconnaissance Inspection that Suzanne Matz and I from this office performed November 22, 2010 at the WWTP. WWTP photographs are included in this report. This letter also serves as a Notice of Violation.

Part I, C, Item 2 in the Schedule of Compliance requires that you notify this office in writing within 14 days of milestone date completion. There is no record in this office's file that this notification was provided. Please advise me in writing as soon as possible regarding dates required in Item 2. Failure to provide required notification is a permit violation.

Part II, Item A in the permit indicates that you must secure the services of a Class I wastewater operator to oversee the WWTP. Please make necessary arrangement to secure the services of a state certified wastewater operator. A listing of state certified operators is available on the web page at:

[http://www.epa.state.oh.us/portals/28/documents/opcert/contract\\_operator\\_list.pdf](http://www.epa.state.oh.us/portals/28/documents/opcert/contract_operator_list.pdf). Failure to provide necessary WWTP oversight is a permit violation.

Part III, Item 4 in the permit requires that discharge monitoring reports be submitted to this office. There is no record that reports have been submitted. Please begin report submittal as soon as possible. Failure to submit required reports is a permit violation.

Past inspection reports sent to you have been returned to this office as unclaimed mail. In addition, there has been no response to either e-mails or voice mail messages to you. Due to your failure to resolve chronic wastewater discharge permit noncompliance and failure to communicate with this office you have left this office no choice other than to proceed with enforcement action in response to violations. Continued wastewater discharge permit noncompliance is unacceptable.

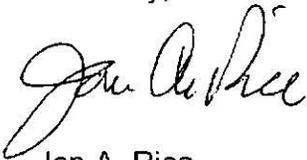
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Mr. James H. Croston, Jr.  
Page -2-

Please inform me, in writing by December 20, 2010, as to the reason(s) for violations referenced in this report, as well as a description of action taken or proposed to prevent any further violations. Your response should include dates, either actual or proposed, for completion of the action.

If you have questions regarding this report I can be reached by telephone at 614-728-3850 or by e-mail at [jan.rice@epa.state.oh.us](mailto:jan.rice@epa.state.oh.us) .

Sincerely,



Jan A. Rice  
Environmental Specialist  
Compliance/Enforcement Unit  
Division of Surface Water  
Central District Office

c: Rita Shiflet, Carvel Manor MHP  
Paul Evans, El Rancho MHP Manager

**NPDES**  
Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

<b>Permit No.</b> 4PV00124*BD	<b>NPDES No.</b> OH0136344	<b>Date</b> 11/22/10	<b>Inspection Type</b> R	<b>Inspector</b> S	<b>Facility Type</b> 2
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**B. FACILITY DATA**

<b>Name and Location of Facility Inspected</b> Croston Investments (El Rancho Mobile Home Park) Wastewater Treatment Plant (WWTP) State Rt. 79, 3.1 miles South of Hickman Newark, Ohio	<b>Entry Time</b> 11:15 A.M.	<b>Permit Effective Date</b> 2/1/07
	<b>Exit Time</b> 11:30 P.M.	<b>Permit Expiration Date</b> 1/31/12

<b>Name(s) and Title(s) of On-Site Representative(s)</b> Paul Evans, Park Manager	<b>Phone Number(s)</b> 740-281-0114
<b>Name(s) Address and Title(s) of Operator of Record</b> Unknown	<b>Phone Number(s)</b>
<b>Name, Address and Title of Responsible Official</b> James Croston, Owner, (home) 72046 Cooper Road, Wilkesville, Ohio 45695 (office) Carvel Manor 14461 State Rt. 104, Ashville, Ohio 43103	<b>Phone Number</b> (cell ) 740-243-5811 (office) 740-983-2682

**C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)**

- S Permit
- N/U Records/Reports – monthly discharge monitoring reports are not being submitted.
- Operations & Maintenance - the Operator of Record for WWTP oversight is unknown. The wastewater discharge permit requires that the WWTP be under the supervision of a Class I state certified wastewater treatment plant operator.
- U permit requires that the WWTP be under the supervision of a Class I state certified wastewater treatment plant operator.
- S Facility Site Review
- N Collection System
- N Flow Measurement
- N Laboratory
- N/N Effluent/Receiving Waters
- N/N Sludge Storage/Disposal
- N Pretreatment
- Compliance Schedules – rated unsatisfactory since there has been no status reports submitted to this office as required in the permit compliance schedule. Item 2 in the schedule requires written verification within 14 days of milestone completion.
- U Self-Monitoring Program – rated unsatisfactory since discharge monitoring reports are not being submitted.

**D. SUMMARY OF FINDINGS/COMMENTS:** This unannounced inspection showed that WWTP construction appears to have been completed. Photographs of several WWTP components are included in this report. At the time of this inspection an aeration blower could be heard and air was being supplied to the aeration tank.

During this site visit I spoke with one of the MHP residents who informed me that the MHP manager is Paul Evans. Mr. Evans was not home but called me later in the day. He said he performed minimal duties at the MHP WWTP. Duties included watching for electrical power outage and to feed chlorination/dechlorination tablets when necessary to the disinfection unit.

Mr. Evans suggested I contact Rita Shiflet (tele. no.: 740-983-2682) at Carvel Manor MHP in Pickaway County to discuss wastewater discharge permit requirements applicable to the El Rancho WWTP. Mr. Evans said that Ms. Shiflet was Mr. Croston's business secretary. Mr. Evans also provided Mr. Croston's telephone number (cell: 740-243-5811). On 11/23/10 messages were left at both telephone numbers asking that Mr. Croston call me for further discussion of the wastewater discharge permit requirements. As of 12/7/10 there had been no response to my telephone messages.

*Jan Rice*

Jan Rice, Inspector, Ohio EPA, Central District Office

*12/9/10*

Date

*Erin Sherer*

Erin Sherer, Reviewer, Ohio EPA, Central District Office

*12-12-10*

Date



Figure 1. This photograph was taken by Jan Rice looking west across the WWTP.

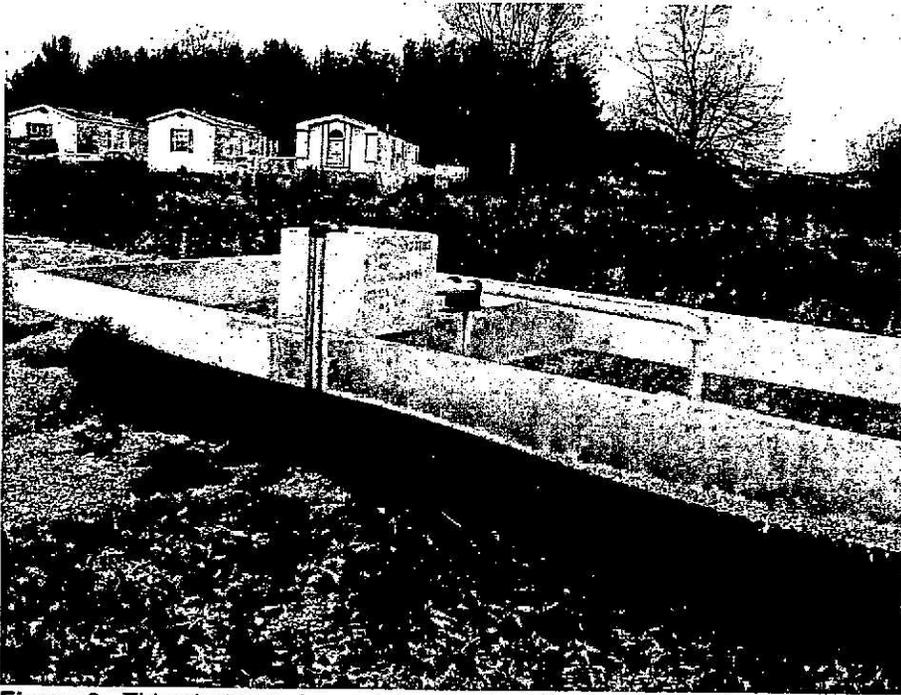


Figure 2. This photograph was taken by Jan Rice looking northwest across the WWTP sand filter.

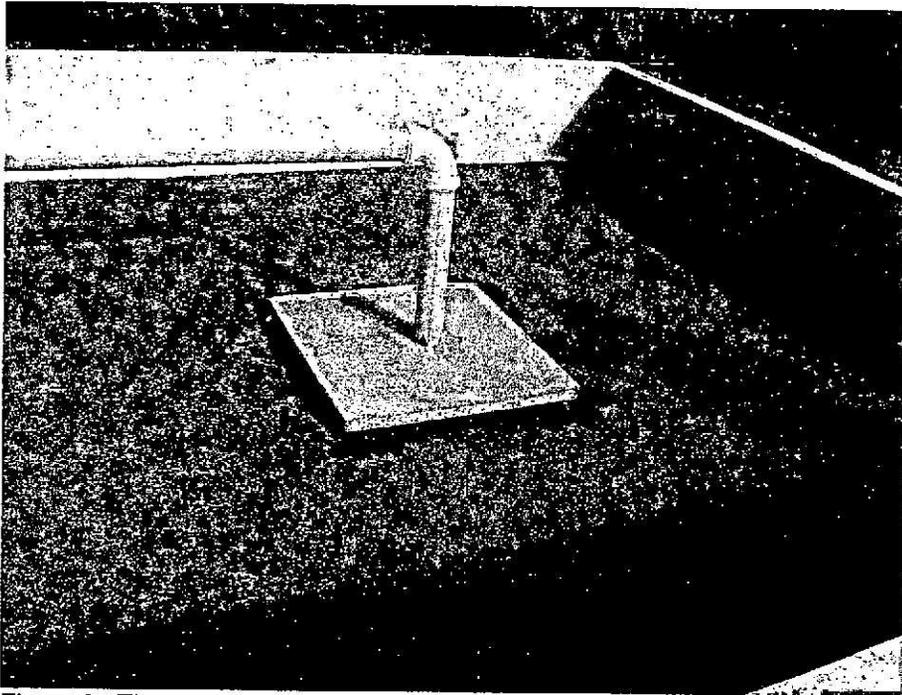


Figure 3. This photograph was taken by Jan Rice of the east cell in the sand filter. The filter appeared generally well maintained with minimal vegetation at the time of this site visit. Vegetation currently in the filter should be removed to prevent further growth.





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