



**Environmental
Protection Agency**

Ted Strickland, Governor
Ler Fisher, Lt. Governor
Chris Koresko, Director

September 8, 2010

RE: MOBILE ACRES MOBILE HOME PARK
NPDES PERMIT NO. 3PV00083
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Steve Mannier, Owner
Mobile Acres Park and Sales
4531 South Ridge Road East
Ashtabula, Ohio 44035

Dear Mr. Mannier:

On August 31, 2010, a site inspection was conducted at the above referenced facility at 4531 South Ridge Road East (U.S. Route 20), Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you represented Mobile Acres Park and Sales, d.b.a. Mannier's Mobile Acres Mobile Home Park. 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 in conjunction with the renewal of said permit. The last compliance inspection was conducted on October 30, 2008.

The collection system consists of both a gravity system and pump station located east of the waste water treatment plant (WWTP). The treatment system consists of a trash trap/grinder pump station, flow equalization basin, extended aeration tanks, clarification, surface sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management of sludge removal from the sludge tanks when needed to sludge drying beds, for ultimate disposal at a landfill. The facility discharges to an unnamed tributary of Fields Brook adjacent to the northwest side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations

Following are observations made during the inspection.

1. The design flow of the extended aeration plant is 20,000 gallons per day. The plant operates continuously.
2. The plant is operated by you. You collect samples, perform some limited onsite readings (pH, color, odor, turbidity, flow), submit samples for laboratory analyses, and once data is received from the laboratory, electronically submit the data to the electronic discharge monitoring report (eDMR) system.
3. Both grinder pumps were out of service for repair, and you had a temporary pump in service to pump wastewater from the pump station to the aeration tank (see pictures). You expect that the grinder pump will be placed back in service in a few weeks.
4. Sludge wasted from the aeration system was being dried on the sludge drying beds. A roll-off box was maintained on site for dewatered sludge awaiting disposal off-site at a licensed solid waste landfill.

5. Components of the blowers were recently replaced, and were operational at the time of the inspection, The content of the aeration tank had a good color and mixing. Sludge returns were a medium brown color with minimal foaming. The surface of the clarifier was clear, and the skimmer appeared to be operating as designed. Effluent channels were reasonably clean. A chlorine tablet was noted in the effluent weir, and you noted that this cuts down on biological growth in the weir.
6. Surface sand filters are maintained under roof, and were operable. Some vegetation was noted in the sand filters which should be removed (see pictures). Some additional rock around the splash pad will help with preventing the sand erosion noted. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity.
7. The chlorination and dechlorination tanks were stocked with chemicals and operating properly. The post-disinfection aeration system was also operating properly.
8. The final effluent was clear. The final discharge at the unnamed tributary was observed as of satisfactory visual quality.

NPDES Permit Compliance Review

Mannier's Mobile Acres Mobile Home Park operates under Permit 3PV00083*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 through August 1, 2010, indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violation was noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.2	2/19/2009

A written explanation as to why this exceedence event occurred was provided via e-mail on April 3, 2009, and no additional response is needed at this time.

Reporting Violations

The following reporting violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00400	pH	1/Week	1	0	10/08/2008
001	50050	Flow Rate	1/Day	1	0	10/10/2008
001	50050	Flow Rate	1/Day	1	0	10/11/2008
001	50050	Flow Rate	1/Day	1	0	10/12/2008
001	00010	Water Temperature	1/Week	1	0	05/08/2009
001	00300	Dissolved Oxygen	1/Week	1	0	05/08/2009
001	00530	Total Suspended Solids	1/Month	1	0	07/01/2009

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001	00610	Nitrogen, Ammonia (NH3	1/Month	1	0	07/01/2009
001	31616	Fecal Coliform	1/Month	1	0	07/01/2009
001	80082	CBOD 5 day	1/Month	1	0	07/01/2009
001	00530	Total Suspended Solids	1/Month	1	0	01/01/2010
001	00610	Nitrogen, Ammonia (NH3	1/Month	1	0	01/01/2010
001	80082	CBOD 5 day	1/Month	1	0	01/01/2010

A written explanation as to why these frequency violation events occurred must be provided, along with measures to ensure that they are not repeated. If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

1. Failure to Designate an Operator of Record - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Although you indicated that you are the operator of record, no official designation has been received by Ohio EPA. An official operator of record must be declared for this facility. The operator of record designation form may be found at the following website: http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf. Please provide evidence that you have submitted a copy of the Operator of Record Notification Form to Ohio EPA. When you notify Ohio EPA central offices, please provide a copy of the notification to Ohio EPA Northeast District Office for our records.
2. Failure to Maintain WWTP - The purpose of providing two grinder pumps at the influent pump station is to ensure that there is one pump in operation at all times. It is highly unlikely that both pumps became inoperable at the same time. Pumps should be repaired immediately once they break down to avoid having to devise a temporary pumping solution. The current method of allowing the raw wastewater to splash across the grate of the aeration tank is not acceptable, and an elbow must be installed to avoid any release of raw sewage to the ground. Please provide documentation that the pumps have been repaired and placed back into service.

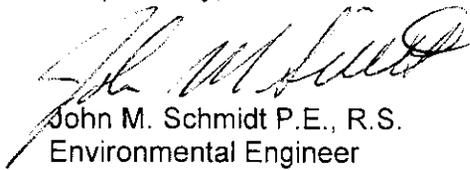
Based upon the following information, Mannier's Mobile Acres Mobile Home Park is considered in marginal compliance with the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. However, the above items must be addressed.

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Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or 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.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

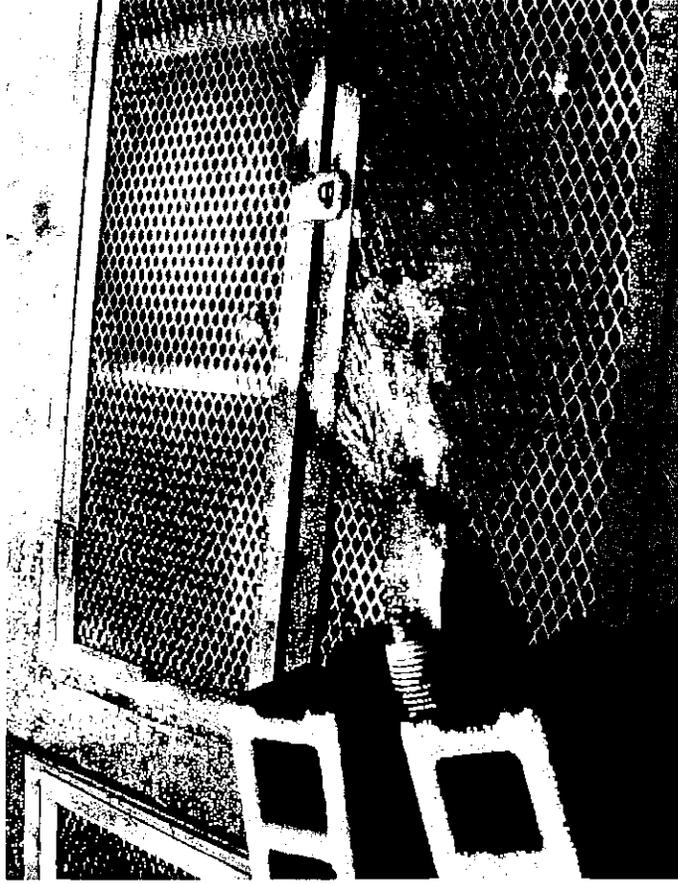
Respectively,



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

JMS:bo

Semipublic/Ashtabula/Ashtabula Twp/Mannier's Mobile Acres MHP



Temporary Pump System at Grinder Pump Station



Vegetative Growth in Sand Filters