

**Environmental
Protection Agency**

John Kasich, Governor
L. Robert Fischer, Lt. Governor
Chris Kuntz, Director

August 4, 2010

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

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

Dear Mr. Herzog:

On July 22, 2010, 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, and I spoke with Mr. Michael Locy, representing Geneva Trailer Park, on the telephone during the inspection. The purpose of the inspection was to follow up on a previous compliance inspection conducted on June 2, 2010 and documented in letters dated January 28, 2010 and March 11, 2010; and 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 June 2, 2010.

The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, and chlorine disinfection. Sludge is removed from an aerated holding tank when needed to another POTW. The facility discharges to an unnamed tributary to Indian Creek adjacent to the west side of the facility. No backup power or alarms are provided to the facility.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 10,000 gallons per day. The plant operates on a timer, and was running and discharging during the July 22, 2010 inspection.
2. The trash trap was functioning properly during the inspection.
3. The content of the aeration tank has both good color and mixing, and a slightly earthy odor. The color, odor, and mixing are indications of a properly operating facility.
4. The sludge holding tank was noted as cleaned and operating properly at the time of the inspection, and appeared to have been emptied since the last inspection.

5. The surface of the clarifier was clear and both the effluent weir and skimmer were functioning properly at the time of this inspection, marking a vast improvement over earlier inspections.
6. Both sand filters have had their sand removed and replaced with the proper gradation of sand. The north filter was operable and the south filter was still under construction from the sand replacement. Mr. Locy noted that you still needed to add about 3 or 4 tons of sand to the filters to ensure that they contain the minimum depth of 18 inches. The plant manager and operator appear to keep the filters reasonably clean and operable, with the filter beds raked.
7. The chlorination tank was noted as having been cleaned and containing the appropriate chemicals. The dechlorination system has been installed to the west of the chlorine contact tank and was stocked with the appropriate chemicals.
8. Ohio EPA notes Mr. Martinez is the park manager and maintains the facility in conjunction with Mr. Locy and Mr. Dustin Lewis of Clean Stream, Inc. Mr. Locy indicated that Mr. Dustin Lewis of Clean Stream, Inc. is now the designated operator of record, assuming his duties on June 10, 2010. Clean Stream, Inc. reports required data to Ohio EPA's electronic discharge monitoring report (eDMR) system on behalf of Geneva Trailer Park.

NPDES Permit Compliance Review

The Geneva Trailer Park operates under expired Permit 3PV00117*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2010 through July 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations are noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	9.94	6/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.37623	6/1/2010
001	31616	Fecal Coliform	30D Conc	1000	3200.	6/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	9.94	6/8/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.06	.37623	6/8/2010
001	31616	Fecal Coliform	7D Conc	2000	3200.	6/8/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	3.7	6/9/2010

Mr. William R. Herzog
 Geneva Mobile Home Park
 August 4, 2010
 Page 3

Geneva Trailer Park provided a rationale for these exceedences, as well as measures to ensure that these will not be exceeded in the future in a June 24, 2010 letter from Michael Locy of A & C Mobile Homes. No additional information is needed to respond to the violations.

Reporting Violations

The following reporting violations (specifically reporting frequency) were noted for the period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	06/01/2010
001	00010	Water Temperature	1/Week	1	0	06/15/2010
001	00010	Water Temperature	1/Week	1	0	06/22/2010
001	00083	Color, Severity	1/Day	1	0	06/01/2010
001	00083	Color, Severity	1/Day	1	0	06/02/2010
001	00083	Color, Severity	1/Day	1	0	06/03/2010
001	00083	Color, Severity	1/Day	1	0	06/04/2010
001	00083	Color, Severity	1/Day	1	0	06/07/2010
001	00083	Color, Severity	1/Day	1	0	06/08/2010
001	00083	Color, Severity	1/Day	1	0	06/10/2010
001	00083	Color, Severity	1/Day	1	0	06/11/2010
001	00083	Color, Severity	1/Day	1	0	06/14/2010
001	00083	Color, Severity	1/Day	1	0	06/15/2010
001	00083	Color, Severity	1/Day	1	0	06/16/2010
001	00083	Color, Severity	1/Day	1	0	06/17/2010
001	00083	Color, Severity	1/Day	1	0	06/18/2010
001	00083	Color, Severity	1/Day	1	0	06/21/2010
001	00083	Color, Severity	1/Day	1	0	06/22/2010
001	00083	Color, Severity	1/Day	1	0	06/23/2010
001	00083	Color, Severity	1/Day	1	0	06/24/2010
001	00083	Color, Severity	1/Day	1	0	06/25/2010
001	00083	Color, Severity	1/Day	1	0	06/28/2010
001	00083	Color, Severity	1/Day	1	0	06/29/2010
001	00083	Color, Severity	1/Day	1	0	06/30/2010
001	01330	Odor, Severity	1/Day	1	0	06/01/2010
001	01330	Odor, Severity	1/Day	1	0	06/02/2010
001	01330	Odor, Severity	1/Day	1	0	06/03/2010
001	01330	Odor, Severity	1/Day	1	0	06/04/2010
001	01330	Odor, Severity	1/Day	1	0	06/07/2010
001	01330	Odor, Severity	1/Day	1	0	06/08/2010
001	01330	Odor, Severity	1/Day	1	0	06/10/2010
001	01330	Odor, Severity	1/Day	1	0	06/11/2010
001	01330	Odor, Severity	1/Day	1	0	06/14/2010

Mr. William R. Herzog
 Geneva Mobile Home Park
 August 4, 2010
 Page 4

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	06/15/2010
001	01330	Odor, Severity	1/Day	1	0	06/16/2010
001	01330	Odor, Severity	1/Day	1	0	06/17/2010
001	01330	Odor, Severity	1/Day	1	0	06/18/2010
001	01330	Odor, Severity	1/Day	1	0	06/21/2010
001	01330	Odor, Severity	1/Day	1	0	06/22/2010
001	01330	Odor, Severity	1/Day	1	0	06/23/2010
001	01330	Odor, Severity	1/Day	1	0	06/24/2010
001	01330	Odor, Severity	1/Day	1	0	06/25/2010
001	01330	Odor, Severity	1/Day	1	0	06/28/2010
001	01330	Odor, Severity	1/Day	1	0	06/29/2010
001	01330	Odor, Severity	1/Day	1	0	06/30/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/01/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/02/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/03/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/04/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/07/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/08/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/10/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/11/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/14/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/15/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/16/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/17/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/18/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/21/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/22/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/23/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/24/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/25/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/28/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/29/2010
001	01350	Turbidity, Severity	1/Day	1	0	06/30/2010
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	06/15/2010
001	00400	pH	1/2Weeks	1	0	06/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	06/01/2010
001	00300	Dissolved Oxygen	1/Week	1	0	06/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	06/22/2010

While many violations were noted in Notices of Violation (NOVs) issued January 28, 2010 and June 23, 2010, you indicated in your June 24, 2010 response letter that Mr. Dustin Lewis of Clean Streams, Inc. became the operator of record of this facility on June 10, 2010. Mr. Lewis's duties include in part ensuring that the necessary tests are

Mr. William R. Herzog
Geneva Mobile Home Park
August 4, 2010
Page 5

performed as well as conducting daily and weekly readings. From examination of the electronic discharge monitoring report (eDMR) data for this facility for this past month, Ohio EPA notes that turbidity, pH, and dissolved oxygen parameters are still not being performed at the required frequency, even those since June 10, 2010. Please note that the operator of record and/or his designee should be collecting these parameters. The Owner (Geneva Trailer Park) and the Operator (Clean Stream, Inc.) must clarify responsibilities for collection of the daily, weekly, and bi-weekly data for this facility. Data must be collected and reported either by the operator of record or under the direct supervision of the designated operator of record.

Please provide a rationale as to why all data at the frequency as prescribed by your NPDES permit has not been provided to Ohio EPA through the eDMR system.

Other Violations

1. Failure to Submit all Data Required by your Discharge Monitoring Reports - Pursuant to Part III, Item 4 of your NPDES permit, Geneva Trailer Park is required to submit the required eDMR data for all parameters as prescribed by your NPDES permit. Ohio EPA has not received data for all parameters, only monthly parameters collected by Valley Environmental and Clean Stream, Inc. Specifically, daily readings for color, odor, and turbidity, weekly readings of water temperature, and bi-weekly readings of pH have not been reported for the month of June 2010 as required by your NPDES permit.

If you need assistance in establishing an eDMR account to submit the required data electronically to Ohio EPA, please go to <http://epa.ohio.gov/dsw/edmr/eDMR.aspx>. 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.

Please provide evidence that you have submitted the missing eDMR information or provide a rationale as to why the required information has not been submitted.

Although great strides have been made to bring this facility back into compliance, frequency violations continue to occur monthly. The Owner and Operator must work together to ensure that daily and weekly data are collected and properly reported into the eDMR. Please be advised that failure to submit complete eDMRs, failure to comply with the compliance schedule in your NPDES permit, and failure to adequately operate and maintain your waste water treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. While significant improvements

Mr. William R. Herzog
Geneva Mobile Home Park
August 4, 2010
Page 6

have been made at this facility over earlier inspections, the Geneva Trailer Park remains in noncompliance with the terms and conditions of its NPDES permit and, therefore, 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.

Ohio EPA will continue to observe this facility to ascertain when this facility can be returned to substantial compliance or an enforcement action needs to be taken. Ohio EPA will not issue the renewal NPDES Permit until the facility can be considered in substantial compliance with the existing permit.

Please inform this office, in writing, within 14 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response 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. A facility must be in substantial compliance prior to issuance or renewal of an NPDES permit. Ohio EPA will perform a follow up inspection to determine compliance prior to taking action on the pending NPDES permit renewal.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1175 or my supervisor, Virginia Wilson, at (330) 963-1180.

Respectfully,



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

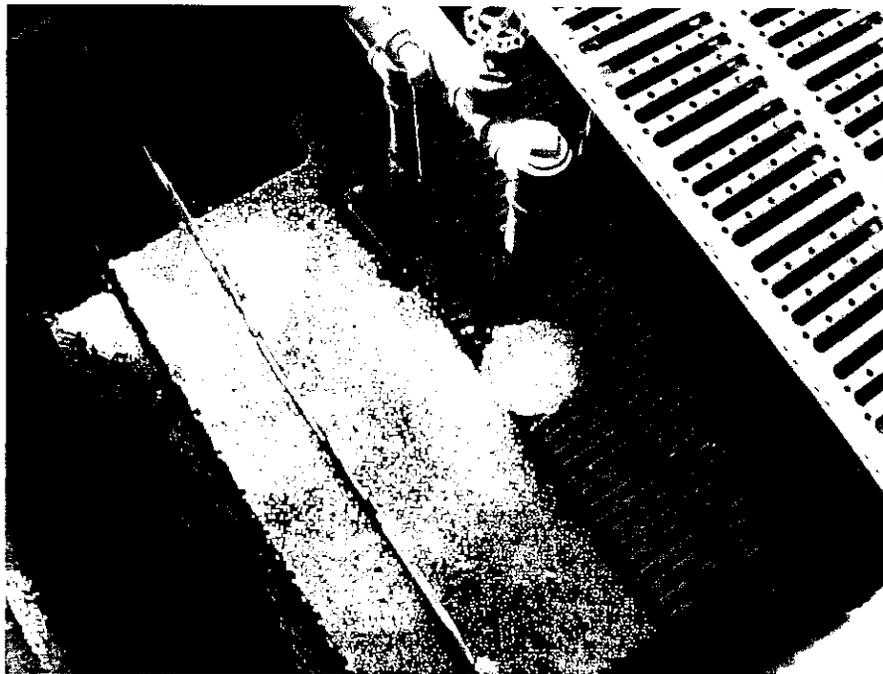
JMS/mt

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

File: Geneva Trailer Park (Geneva Twp) Ashtabula Co./Semipublic P/C

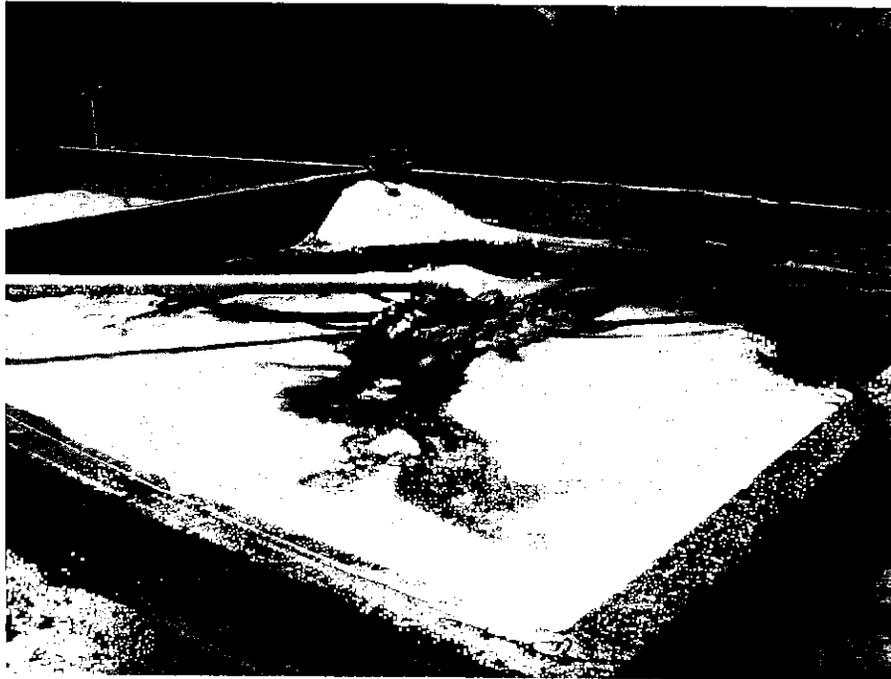


Aeration Tank, 07-22-10 Inspection

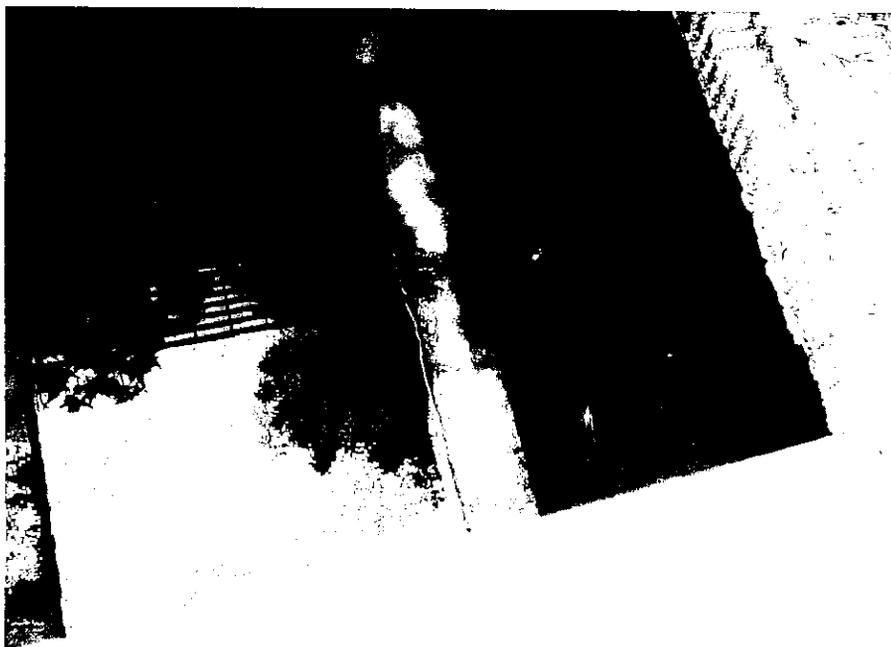


Skimmer and Extended Aeration Clarifier Effluent Weir, 07-22-10 Inspection

Mr. William R. Herzog
Geneva Mobile Home Park
August 4, 2010
Page 9

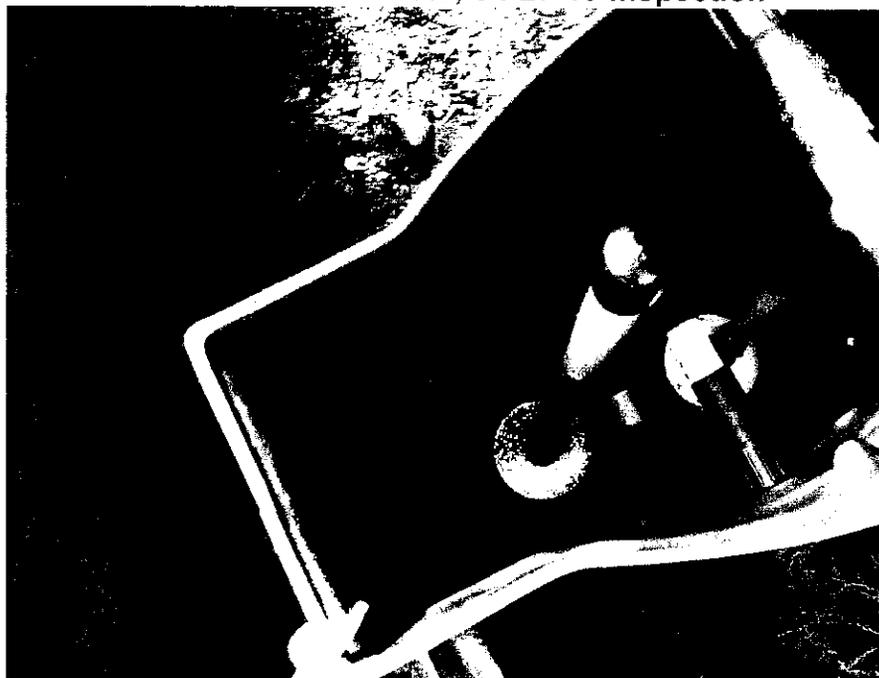


North Sand Filter, 07-22-10 Inspection



Mr. William R. Herzog
Geneva Mobile Home Park
August 4, 2010
Page 10

Disinfection Chamber, 04-27-10 Inspection



Dechlorination Unit, 07-22-10 Inspection