



**Environmental
Protection Agency**

_____, Governor
_____, Lt. Governor
_____, Director

June 23, 2010

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

Mr. Michael B. Locy
A & C Mobile Homes
P.O. Box 1001
Ashtabula, Ohio 44005-1001

Dear Mr. Locy:

On April 27, 2010 and June 2, 2010, follow up site inspections were 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, and Mr. Gregorio Martinez, park manager, represented Geneva Mobile Home Park during each inspection. The purpose of the inspection was to follow up on a previous compliance inspection conducted on December 29, 2009; 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 December 29, 2009.

The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, and chlorine disinfection. Sludge management consists of sludge removal from an aerated sludge 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 operated continuously, but due to the sand filter being plugged, was not discharging to the chlorination system at the time of the April 27, 2010 inspection. The plant was discharging during the June 2, 2010 inspection.
2. During the April 27, 2010 inspection, the trash trap discharge line was observed to have been repaired and was operating properly.
3. During the April 27, 2010 inspection, the content of the aeration tank had a slight septic odor, light brown color with fair mixing, and the blowers were running

although the plant was not receiving any aeration. Repairs to the blower system were evident in the June 2, 2010 inspection, with the plant receiving good aeration and better color, but the sludge color was still dark, reflecting a lack of sludge removal from the system. A chocolate brown color and thicker tank contents are more typical for the aeration tank.

4. The sludge holding tank was noted as full of solids at both the April 27, 2010 and June 2, 2010 inspections. Sludge should be removed from this system to another POTW as soon as possible pursuant to your permit.
5. The surface of the clarifier was full of debris, and the sludge blanket was near the surface as noted in both the April 27, 2010 and June 2, 2010 inspections. During both the April 27, 2010 and June 2, 2010 inspections, effluent channels were dirty and full of sludge, and it was apparent that they had not been scrubbed down in some time. The scum skimmer appeared to be plugged and was not operating at the time of the April 27, 2010 inspection, but was operating once again at the June 2, 2010 inspection. There was less solids carryover into the clarifier effluent channels in the June 2, 2010 inspection than the April 27, 2010 inspection, but some carryover was still noted.
6. The south surface sand filter had several feet of wastewater in them, with solids and floating debris in the filter noted in the April 27, 2010 inspection. The filter was in better shape in the June 2, 2010 inspection, but the sand in the filter did not appear to meet specifications in that it contains too many fines. Mr. Martinez stated he switches between filters every few days, and that the filters plug because of a layer of sludge forming across the sand layer. The plant manager does appear to keep the filters reasonably clean and operable, with the filter beds raked. You indicated that there was the wrong type of sand in the sand filters, and that once the extended aeration system is functioning properly that the existing sand would be removed and replaced with the appropriate sand.
7. The final discharge at the tributary was not observed due to lack of flow coming from the plant in the April 27, 2010 inspection. The effluent was noted as somewhat turbid in the June 2, 2010 inspection.
8. The chlorination tank was noted as having a significant accumulation of algae and debris in the April 27, 2010 inspection. The tank appears to have been cleaned prior to the June 2, 2010 inspection. No chemicals were in the chlorine contact tank and the disinfection season commenced May 1, 2010. Mr. Martinez indicated that he is still awaiting chemicals (chlorination and dechlorination tablets). As the chlorination season is underway, this tank must be properly disinfecting the effluent.

9. Mr. Martinez states that he is the new park manager, and maintains the facility. It is unknown who is the designated operator of record. It is still unknown to Ohio who is your operator of record. As previously discussed with you, Geneva Trailer Park must obtain the services of a licensed "Class 1" WWTP Operator or higher to operate the plant the minimum frequency specified in the rules and report required data to Ohio EPA's electronic discharge monitoring report (e-DMR) system. You indicated that you were securing the services of a qualified operator.

10. The ground surrounding the piping beneath the dosing chamber was noted as saturated in the April 27, 2010 inspection, suggesting that there is a pipe break in this area. The area appears to have been repaired prior to the June 2, 2010 inspection.

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, 2007 through May 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	00530	Total Suspended Solids	30D Conc	12	22.	12/1/2008
001	00530	Total Suspended Solids	7D Conc	18	22.	12/1/2008
001	00530	Total Suspended Solids	30D Qty	0.45	.8327	12/1/2008
001	00530	Total Suspended Solids	7D Qty	0.68	.8327	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	13.8	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	13.8	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.52233	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.52233	12/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	4.2	12/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	7/1/2008
001	31616	Fecal Coliform	30D Conc	1000	1200.	10/1/2008
001	31616	Fecal Coliform	30D Conc	1000	6000.	6/1/2007
001	31616	Fecal Coliform	7D Conc	2000	6000.	6/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	6/5/2007
001	00530	Total Suspended Solids	30D Qty	0.45	.4542	2/1/2008
001	00530	Total Suspended Solids	30D Conc	12	44.	8/1/2008
001	00530	Total Suspended Solids	7D Conc	18	44.	8/1/2008
001	00530	Total Suspended Solids	30D Qty	0.45	1.6654	8/1/2008
001	00530	Total Suspended Solids	7D Qty	0.68	1.6654	8/1/2008

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.6	8/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	3.6	8/1/2008
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.13626	8/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.06	.13626	8/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	4.1	8/5/2008
001	50060	Chlorine, Total Residual	1D Conc	0.019	.14	5/13/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	10/2/2007
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	4.51	9/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	4.51	9/1/2008
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.1707	9/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.06	.1707	9/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	3.6	9/2/2008
001	31616	Fecal Coliform	30D Conc	1000	1400.	7/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	7/3/2007
001	00530	Total Suspended Solids	30D Conc	12	16.	12/1/2007
001	00530	Total Suspended Solids	30D Qty	0.45	.6056	12/1/2007
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	7.82	12/1/2007
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	7.82	12/1/2007
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.29599	12/1/2007
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.29599	12/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	8/1/2007
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	6.01	9/1/2007
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	6.01	9/1/2007
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.22748	9/1/2007
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.06	.22748	9/1/2007
001	31616	Fecal Coliform	30D Conc	1000	2500.	9/1/2007
001	31616	Fecal Coliform	7D Conc	2000	2500.	9/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.9	9/4/2007
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	25.5	1/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	25.5	1/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.96518	1/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.96518	1/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.	1/6/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	29.4	2/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	29.4	2/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	1.11279	2/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	1.11279	2/1/2010
001	80082	CBOD 5 day	30D Conc	10	12.	2/1/2010
001	80082	CBOD 5 day	30D Qty	0.38	.4542	2/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	2/3/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.	4/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	11.	4/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.41635	4/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.41635	4/1/2010

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	1000	1100.	8/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	8/5/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	23.6	11/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	23.6	11/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.89326	11/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.89326	11/1/2009
001	80082	CBOD 5 day	30D Conc	10	26.	11/1/2009
001	80082	CBOD 5 day	7D Conc	15	26.	11/1/2009
001	80082	CBOD 5 day	30D Qty	0.38	.9841	11/1/2009
001	80082	CBOD 5 day	7D Qty	0.57	.9841	11/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.5	11/4/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.33	7/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.05034	7/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.1	7/7/2009
001	31616	Fecal Coliform	30D Conc	1000	75800.	5/1/2009
001	31616	Fecal Coliform	7D Conc	2000	75800.	5/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	3.5	5/6/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	15.6	3/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	15.6	3/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.59046	3/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.59046	3/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	23.1	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	23.1	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.87434	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.87434	3/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	2.7	3/3/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	21.1	2/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	21.1	2/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.79864	2/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.79864	2/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.3	4/2/2009
001	31616	Fecal Coliform	30D Conc	1000	12000.	6/1/2009
001	31616	Fecal Coliform	7D Conc	2000	12000.	6/8/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	6/10/2009

Please provide a rationale for these exceedences, as well as measures to ensure that these will not be exceeded in the future.

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	00300	Dissolved Oxygen	1/Week	1	0	06/08/2007
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	06/15/2007
001	00400	pH	1/2Weeks	1	0	06/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	06/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	06/22/2007
001	00300	Dissolved Oxygen	1/Week	1	0	07/08/2007
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	07/15/2007
001	00400	pH	1/2Weeks	1	0	07/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	07/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	07/22/2007
001	00300	Dissolved Oxygen	1/Week	1	0	08/08/2007
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	08/15/2007
001	00400	pH	1/2Weeks	1	0	08/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	08/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	08/22/2007
001	00300	Dissolved Oxygen	1/Week	1	0	08/22/2007
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	09/08/2007
001	00400	pH	1/2Weeks	1	0	09/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	09/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	09/22/2007
001	00300	Dissolved Oxygen	1/Week	1	0	10/08/2007
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	10/15/2007
001	00400	pH	1/2Weeks	1	0	10/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	10/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	10/22/2007
001	00300	Dissolved Oxygen	1/Week	1	0	11/08/2007
001	00400	pH	1/2Weeks	1	0	11/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	11/15/2007
001	00300	Dissolved Oxygen	1/Week	1	0	11/22/2007
001	00400	pH	1/2Weeks	1	0	12/08/2007
001	00300	Dissolved Oxygen	1/Week	1	0	12/15/2007
001	00300	Dissoived Oxygen	1/Week	1	0	12/22/2007
001	00083	Color, Severity	1/Day	1	0	01/07/2008
001	01330	Odor, Severity	1/Day	1	0	01/07/2008
001	01350	Turbidity, Severity	1/Day	1	0	01/07/2008
001	00300	Dissolved Oxygen	1/Week	1	0	01/08/2008
001	00083	Color, Severity	1/Day	1	0	01/14/2008
001	01330	Odor, Severity	1/Day	1	0	01/14/2008
001	01350	Turbidity, Severity	1/Day	1	0	01/14/2008
001	00400	pH	1/2Weeks	1	0	01/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	01/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	01/22/2008
001	00083	Color, Severity	1/Day	1	0	01/28/2008

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	01/28/2008
001	01350	Turbidity, Severity	1/Day	1	0	01/28/2008
001	00083	Color, Severity	1/Day	1	0	01/29/2008
001	01330	Odor, Severity	1/Day	1	0	01/29/2008
001	01350	Turbidity, Severity	1/Day	1	0	01/29/2008
001	00083	Color, Severity	1/Day	1	0	01/30/2008
001	01330	Odor, Severity	1/Day	1	0	01/30/2008
001	01350	Turbidity, Severity	1/Day	1	0	01/30/2008
001	00083	Color, Severity	1/Day	1	0	01/31/2008
001	01330	Odor, Severity	1/Day	1	0	01/31/2008
001	01350	Turbidity, Severity	1/Day	1	0	01/31/2008
001	00300	Dissolved Oxygen	1/Week	1	0	02/08/2008
001	00400	pH	1/2Weeks	1	0	02/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	02/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	02/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	03/08/2008
001	00400	pH	1/2Weeks	1	0	03/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	03/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	03/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	04/08/2008
001	00400	pH	1/2Weeks	1	0	04/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	04/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	04/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	05/01/2008
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	05/15/2008
001	00400	pH	1/2Weeks	1	0	05/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	05/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	05/22/2008
001	00083	Color, Severity	1/Day	1	0	06/06/2008
001	01330	Odor, Severity	1/Day	1	0	06/06/2008
001	01350	Turbidity, Severity	1/Day	1	0	06/06/2008
001	00300	Dissolved Oxygen	1/Week	1	0	06/08/2008
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	06/15/2008
001	00400	pH	1/2Weeks	1	0	06/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	06/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	06/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	07/08/2008
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	07/15/2008
001	00400	pH	1/2Weeks	1	0	07/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	07/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	07/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	08/08/2008
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	08/15/2008
001	00400	pH	1/2Weeks	1	0	08/15/2008

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00300	Dissolved Oxygen	1/Week	1	0	08/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	08/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	09/08/2008
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	09/15/2008
001	00400	pH	1/2Weeks	1	0	09/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	09/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	09/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	10/08/2008
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	10/15/2008
001	00400	pH	1/2Weeks	1	0	10/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	10/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	10/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	11/08/2008
001	00400	pH	1/2Weeks	1	0	11/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	11/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	11/22/2008
001	00300	Dissolved Oxygen	1/Week	1	0	12/08/2008
001	00400	pH	1/2Weeks	1	0	12/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	12/15/2008
001	00300	Dissolved Oxygen	1/Week	1	0	12/22/2008
001	00083	Color, Severity	1/Day	1	0	01/02/2009
001	01330	Odor, Severity	1/Day	1	0	01/02/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/02/2009
001	00083	Color, Severity	1/Day	1	0	01/05/2009
001	01330	Odor, Severity	1/Day	1	0	01/05/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/05/2009
001	00083	Color, Severity	1/Day	1	0	01/07/2009
001	01330	Odor, Severity	1/Day	1	0	01/07/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/07/2009
001	00010	Water Temperature	1/Week	1	0	01/08/2009
001	00083	Color, Severity	1/Day	1	0	01/08/2009
001	01330	Odor, Severity	1/Day	1	0	01/08/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/08/2009
001	00300	Dissolved Oxygen	1/Week	1	0	01/08/2009
001	00083	Color, Severity	1/Day	1	0	01/09/2009
001	01330	Odor, Severity	1/Day	1	0	01/09/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/09/2009
001	00083	Color, Severity	1/Day	1	0	01/12/2009
001	01330	Odor, Severity	1/Day	1	0	01/12/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/12/2009
001	00083	Color, Severity	1/Day	1	0	01/13/2009
001	01330	Odor, Severity	1/Day	1	0	01/13/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/13/2009
001	00083	Color, Severity	1/Day	1	0	01/14/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	01/14/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/14/2009
001	00010	Water Temperature	1/Week	1	0	01/15/2009
001	00083	Color, Severity	1/Day	1	0	01/15/2009
001	01330	Odor, Severity	1/Day	1	0	01/15/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/15/2009
001	00400	pH	1/2Weeks	1	0	01/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	01/15/2009
001	00083	Color, Severity	1/Day	1	0	01/16/2009
001	01330	Odor, Severity	1/Day	1	0	01/16/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/16/2009
001	00083	Color, Severity	1/Day	1	0	01/19/2009
001	01330	Odor, Severity	1/Day	1	0	01/19/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/19/2009
001	00083	Color, Severity	1/Day	1	0	01/20/2009
001	01330	Odor, Severity	1/Day	1	0	01/20/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/20/2009
001	00083	Color, Severity	1/Day	1	0	01/21/2009
001	01330	Odor, Severity	1/Day	1	0	01/21/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/21/2009
001	00010	Water Temperature	1/Week	1	0	01/22/2009
001	00083	Color, Severity	1/Day	1	0	01/22/2009
001	01330	Odor, Severity	1/Day	1	0	01/22/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	01/22/2009
001	00083	Color, Severity	1/Day	1	0	01/23/2009
001	01330	Odor, Severity	1/Day	1	0	01/23/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/23/2009
001	00083	Color, Severity	1/Day	1	0	01/26/2009
001	01330	Odor, Severity	1/Day	1	0	01/26/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/26/2009
001	00083	Color, Severity	1/Day	1	0	01/27/2009
001	01330	Odor, Severity	1/Day	1	0	01/27/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/27/2009
001	00083	Color, Severity	1/Day	1	0	01/28/2009
001	01330	Odor, Severity	1/Day	1	0	01/28/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/28/2009
001	00083	Color, Severity	1/Day	1	0	01/29/2009
001	01330	Odor, Severity	1/Day	1	0	01/29/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/29/2009
001	00083	Color, Severity	1/Day	1	0	01/30/2009
001	01330	Odor, Severity	1/Day	1	0	01/30/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/30/2009
001	00083	Color, Severity	1/Day	1	0	02/02/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	02/02/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/02/2009
001	00083	Color, Severity	1/Day	1	0	02/03/2009
001	01330	Odor, Severity	1/Day	1	0	02/03/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/03/2009
001	00083	Color, Severity	1/Day	1	0	02/05/2009
001	01330	Odor, Severity	1/Day	1	0	02/05/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/05/2009
001	00083	Color, Severity	1/Day	1	0	02/06/2009
001	01330	Odor, Severity	1/Day	1	0	02/06/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/06/2009
001	00010	Water Temperature	1/Week	1	0	02/08/2009
001	00300	Dissolved Oxygen	1/Week	1	0	02/08/2009
001	00083	Color, Severity	1/Day	1	0	02/09/2009
001	01330	Odor, Severity	1/Day	1	0	02/09/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/09/2009
001	00083	Color, Severity	1/Day	1	0	02/10/2009
001	01330	Odor, Severity	1/Day	1	0	02/10/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/10/2009
001	00083	Color, Severity	1/Day	1	0	02/11/2009
001	01330	Odor, Severity	1/Day	1	0	02/11/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/11/2009
001	00083	Color, Severity	1/Day	1	0	02/12/2009
001	01330	Odor, Severity	1/Day	1	0	02/12/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/12/2009
001	00083	Color, Severity	1/Day	1	0	02/13/2009
001	01330	Odor, Severity	1/Day	1	0	02/13/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/13/2009
001	00010	Water Temperature	1/Week	1	0	02/15/2009
001	00400	pH	1/2Weeks	1	0	02/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	02/15/2009
001	00083	Color, Severity	1/Day	1	0	02/17/2009
001	01330	Odor, Severity	1/Day	1	0	02/17/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/17/2009
001	00083	Color, Severity	1/Day	1	0	02/18/2009
001	01330	Odor, Severity	1/Day	1	0	02/18/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/18/2009
001	00083	Color, Severity	1/Day	1	0	02/19/2009
001	01330	Odor, Severity	1/Day	1	0	02/19/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/19/2009
001	00083	Color, Severity	1/Day	1	0	02/20/2009
001	01330	Odor, Severity	1/Day	1	0	02/20/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/20/2009
001	00010	Water Temperature	1/Week	1	0	02/22/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00300	Dissolved Oxygen	1/Week	1	0	02/22/2009
001	00083	Color, Severity	1/Day	1	0	02/23/2009
001	01330	Odor, Severity	1/Day	1	0	02/23/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/23/2009
001	00083	Color, Severity	1/Day	1	0	02/24/2009
001	01330	Odor, Severity	1/Day	1	0	02/24/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/24/2009
001	00083	Color, Severity	1/Day	1	0	02/25/2009
001	01330	Odor, Severity	1/Day	1	0	02/25/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/25/2009
001	00083	Color, Severity	1/Day	1	0	02/26/2009
001	01330	Odor, Severity	1/Day	1	0	02/26/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/26/2009
001	00083	Color, Severity	1/Day	1	0	02/27/2009
001	01330	Odor, Severity	1/Day	1	0	02/27/2009
001	01350	Turbidity, Severity	1/Day	1	0	02/27/2009
001	00300	Dissolved Oxygen	1/Week	1	0	03/08/2009
001	00400	pH	1/2Weeks	1	0	03/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	03/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	03/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	04/08/2009
001	00400	pH	1/2Weeks	1	0	04/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	04/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	04/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	05/08/2009
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	05/15/2009
001	00400	pH	1/2Weeks	1	0	05/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	05/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	05/22/2009
001	00300	Dissoived Oxygen	1/Week	1	0	06/01/2009
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	06/15/2009
001	00400	pH	1/2Weeks	1	0	06/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	06/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	06/22/2009
001	00300	Dissoived Oxygen	1/Week	1	0	07/08/2009
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	07/15/2009
001	00400	pH	1/2Weeks	1	0	07/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	07/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	07/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	08/08/2009
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	08/15/2009
001	00400	pH	1/2Weeks	1	0	08/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	08/15/2009
001	00300	Dissoived Oxygen	1/Week	1	0	08/22/2009

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00300	Dissolved Oxygen	1/Week	1	0	09/08/2009
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	09/15/2009
001	00400	pH	1/2Weeks	1	0	09/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	09/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	09/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	10/08/2009
001	50060	Chlorine, Total Residu	1/2Weeks	1	0	10/15/2009
001	00400	pH	1/2Weeks	1	0	10/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	10/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	10/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	11/08/2009
001	00400	pH	1/2Weeks	1	0	11/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	11/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	11/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	12/08/2009
001	00400	pH	1/2Weeks	1	0	12/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	12/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	12/22/2009
001	01350	Turbidity, Severity	1/Day	1	0	01/04/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/05/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/07/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/08/2010
001	00300	Dissolved Oxygen	1/Week	1	0	01/08/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/11/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/12/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/13/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/14/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/15/2010
001	00400	pH	1/2Weeks	1	0	01/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	01/15/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/15/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/19/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/20/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/21/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/22/2010
001	00300	Dissolved Oxygen	1/Week	1	0	01/22/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/25/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/26/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/27/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/28/2010
001	01350	Turbidity, Severity	1/Day	1	0	01/29/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/01/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/02/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/03/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/04/2010

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01350	Turbidity, Severity	1/Day	1	0	02/05/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/08/2010
001	00300	Dissolved Oxygen	1/Week	1	0	02/08/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/09/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/10/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/11/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/12/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/15/2010
001	00400	pH	1/2Weeks	1	0	02/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	02/15/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/16/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/17/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/18/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/19/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/22/2010
001	00300	Dissolved Oxygen	1/Week	1	0	02/22/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/23/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/24/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/25/2010
001	01350	Turbidity, Severity	1/Day	1	0	02/26/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/01/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/02/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/04/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/05/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/08/2010
001	00300	Dissolved Oxygen	1/Week	1	0	03/08/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/09/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/10/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/11/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/12/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/15/2010
001	00400	pH	1/2Weeks	1	0	03/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	03/15/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/16/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/17/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/18/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/19/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/22/2010
001	00300	Dissolved Oxygen	1/Week	1	0	03/22/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/23/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/24/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/25/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/26/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/29/2010

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Station	Reporting		Sample			Violation Date
	Code	Parameter	Frequency	Expected	Reported	
001	01350	Turbidity, Severity	1/Day	1	0	03/30/2010
001	01350	Turbidity, Severity	1/Day	1	0	03/31/2010
001	00083	Color, Severity	1/Day	1	0	04/02/2010
001	01330	Odor, Severity	1/Day	1	0	04/02/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/02/2010
001	00083	Color, Severity	1/Day	1	0	04/05/2010
001	01330	Odor, Severity	1/Day	1	0	04/05/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/05/2010
001	00083	Color, Severity	1/Day	1	0	04/06/2010
001	01330	Odor, Severity	1/Day	1	0	04/06/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/06/2010
001	00083	Color, Severity	1/Day	1	0	04/07/2010
001	01330	Odor, Severity	1/Day	1	0	04/07/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/07/2010
001	00010	Water Temperature	1/Week	1	0	04/08/2010
001	00083	Color, Severity	1/Day	1	0	04/08/2010
001	01330	Odor, Severity	1/Day	1	0	04/08/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/08/2010
001	00300	Dissolved Oxygen	1/Week	1	0	04/08/2010
001	00083	Color, Severity	1/Day	1	0	04/09/2010
001	01330	Odor, Severity	1/Day	1	0	04/09/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/09/2010
001	00083	Color, Severity	1/Day	1	0	04/12/2010
001	01330	Odor, Severity	1/Day	1	0	04/12/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/12/2010
001	00083	Color, Severity	1/Day	1	0	04/13/2010
001	01330	Odor, Severity	1/Day	1	0	04/13/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/13/2010
001	00083	Color, Severity	1/Day	1	0	04/14/2010
001	01330	Odor, Severity	1/Day	1	0	04/14/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/14/2010
001	00010	Water Temperature	1/Week	1	0	04/15/2010
001	00083	Color, Severity	1/Day	1	0	04/15/2010
001	01330	Odor, Severity	1/Day	1	0	04/15/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/15/2010
001	00400	pH	1/2Weeks	1	0	04/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	04/15/2010
001	00083	Color, Severity	1/Day	1	0	04/16/2010
001	01330	Odor, Severity	1/Day	1	0	04/16/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/16/2010
001	00083	Color, Severity	1/Day	1	0	04/19/2010
001	01330	Odor, Severity	1/Day	1	0	04/19/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/19/2010
001	00083	Color, Severity	1/Day	1	0	04/20/2010

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	04/20/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/20/2010
001	00083	Color, Severity	1/Day	1	0	04/21/2010
001	01330	Odor, Severity	1/Day	1	0	04/21/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/21/2010
001	00010	Water Temperature	1/Week	1	0	04/22/2010
001	00083	Color, Severity	1/Day	1	0	04/22/2010
001	01330	Odor, Severity	1/Day	1	0	04/22/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/22/2010
001	00300	Dissolved Oxygen	1/Week	1	0	04/22/2010
001	00083	Color, Severity	1/Day	1	0	04/23/2010
001	01330	Odor, Severity	1/Day	1	0	04/23/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/23/2010
001	00083	Color, Severity	1/Day	1	0	04/26/2010
001	01330	Odor, Severity	1/Day	1	0	04/26/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/26/2010
001	00083	Color, Severity	1/Day	1	0	04/27/2010
001	01330	Odor, Severity	1/Day	1	0	04/27/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/27/2010
001	00083	Color, Severity	1/Day	1	0	04/28/2010
001	01330	Odor, Severity	1/Day	1	0	04/28/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/28/2010
001	00083	Color, Severity	1/Day	1	0	04/29/2010
001	01330	Odor, Severity	1/Day	1	0	04/29/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/29/2010
001	00083	Color, Severity	1/Day	1	0	04/30/2010
001	01330	Odor, Severity	1/Day	1	0	04/30/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/30/2010

While many violations were noted in Notices of Violation (NOVs) issued January 28, 2010, you indicated in your March 15, 2010 response letter that you contacted Valley Environmental to ensure that the necessary tests will be performed. From examination of the electronic discharge monitoring report (eDMR) data for this facility, Ohio EPA notes that turbidity, pH, and dissolved oxygen parameters are still not being performed at the required frequency. Please note that the operator of record should be collecting these parameters. When asked, Mr. Martinez indicated that he is not a licensed wastewater treatment plant operator in the State of Ohio. If Geneva Trailer Park has contracted with Brian and Pat Mosko of Valley Environmental as the operators of record of this facility, then data should be collected and reported either by the operator of record or under the direct supervision of the designated operator of record.

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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.

Compliance Schedule Violations

Based upon a review of Ohio EPA's files, the following is a compliance schedule summary as specified by your permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
03/01/2004	02/28/2009	04/01/2004	Unknown	---	Plans O & M	Submit plan for actions to achieve compliance
03/01/2004	02/28/2009	04/01/2004	Unknown	01299	Procedures	Interim Measures Attain Operational Level for Chlorine, ammonia, and dissolved oxygen
03/01/2004	02/28/2009	09/01/2004	Unknown	05599	Operational	

From further examination of Ohio EPA's files, there is no record of submission of a plan detailing the actions to be taken to achieve effluent compliance with the final effluent limits for chlorine, ammonia, and dissolved oxygen. Pursuant to Part 1C of your permit, this was due no later than April 1, 2004. The plan was to contain a schedule for compliance, with compliance achieved no later than September 1, 2004.

Please provide a rationale for the missed milestones and submit to Ohio EPA the plan as prescribed by your NPDES permit for compliance with the effluent limits.

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 DMR data for all parameters as prescribed by your NPDES permit. Ohio EPA has not received data for all parameters, only the monthly parameters collected by Valley Environmental.

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.

- 2. Failure to Contract with a Licensed Wastewater Plant Operator** - 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. Geneva Trailer Park may contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation of the WWTP provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. In your March 15, 2010 response, you indicated contracting with Valley Environmental for the necessary supplies, but did not indicate that Valley Environmental will become the operator of record for this facility. From the June 2, 2010 inspection, it appears that you may be contracting with a different operator. Geneva Trailer Park must formally notify Ohio EPA of its designated operator of record. Necessary forms for doing this may be found on the Web at <http://epa.ohio.gov/dsw/opcert/opcert.aspx>. Please note that Ohio rules (Ohio Administrative Code 3745-7-04) obligate the operator of record to inspect and maintain the facility with a minimum number of visits and a specified duration of each visit per week, as well as being available to respond to any emergencies if and when they arise. To-date, Ohio EPA has not received a contract with an appropriately certified operator. For your reference, I have attached a list of certified contract operators.

Please provide evidence that you have contracted with an appropriately certified operator to operate your WWTP and notified Ohio EPA central office of the operator of record.

- 3. Failure to Renew your NPDES Permit**: The Geneva Trailer Park operates under Permit 3PV00117*AD, which expired on February 28, 2009. Geneva Trailer Park was notified in the winter of 2008 that a renewal application was due to Ohio EPA no later than August 28, 2008. The application was received on May 18, 2010. As the application has been received, no response is necessary to respond to the violation.

Frequency violations continue to occur monthly. The current expired permit must be reviewed so that all parameters are reported at the proper frequency. Please be advised that failure to submit complete DMRs, failure to comply with the compliance schedule in your NPDES permit, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. While significant improvements have been made at this facility over earlier inspections, the

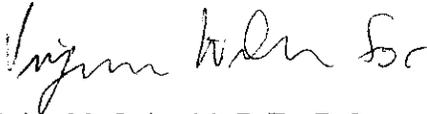
Mr. Michael B. Locy
Geneva MHP
June 23, 2010
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Geneva Trailer Park remains in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

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.

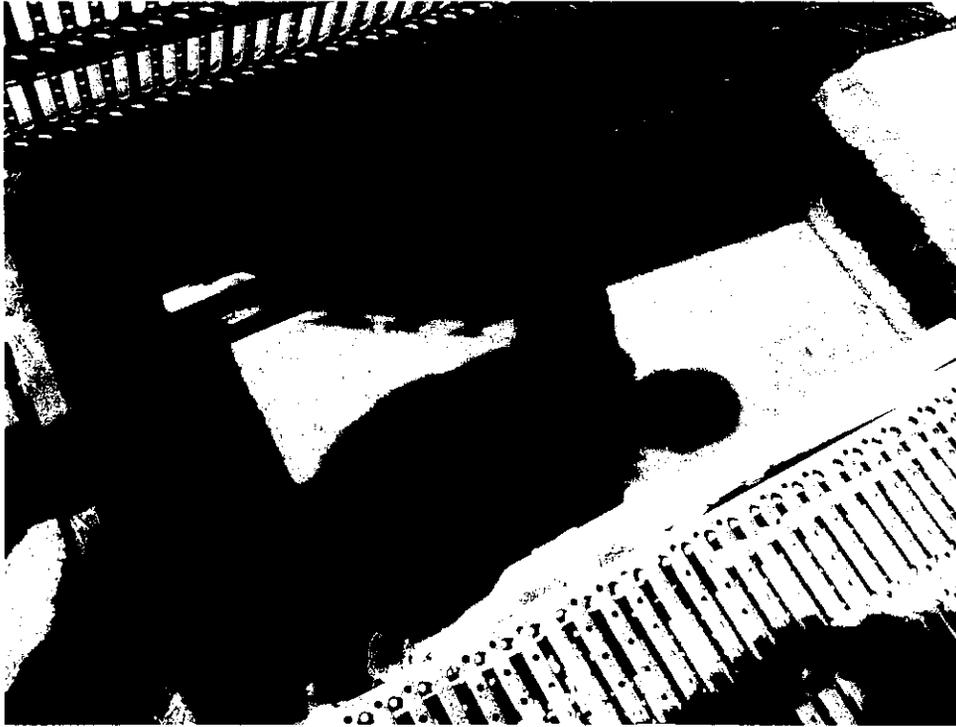
Respectfully,



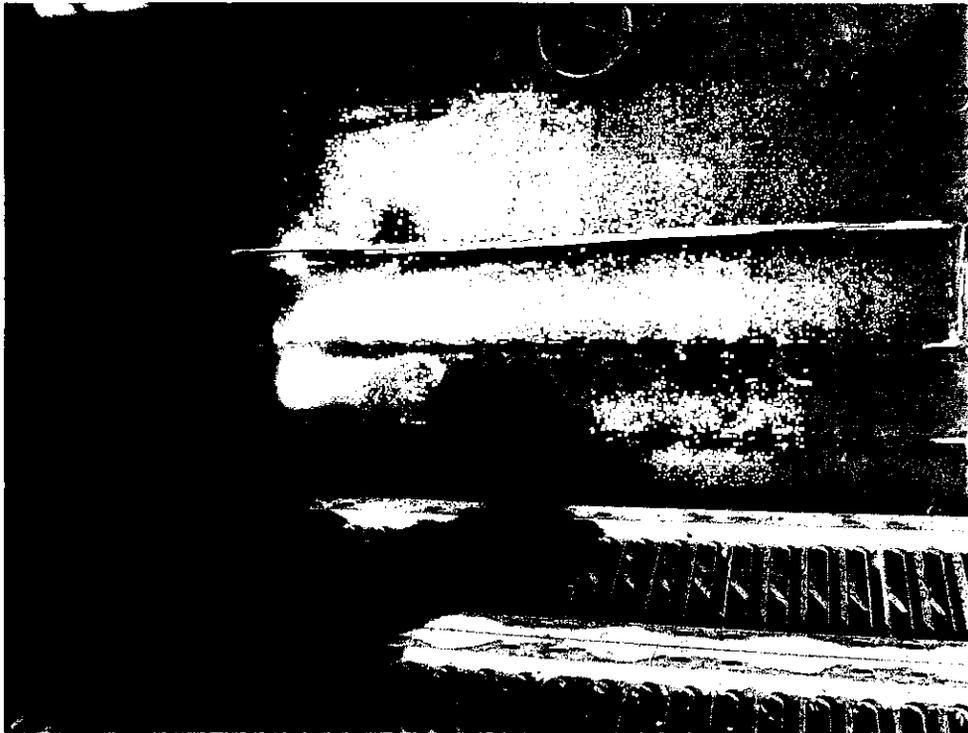
John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

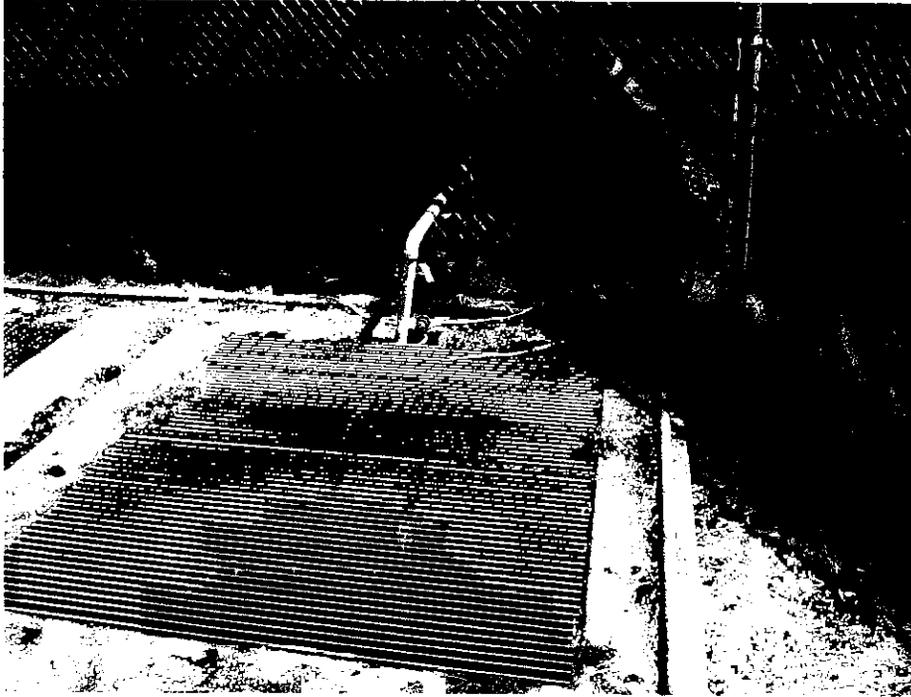
File: Geneva Trailer Park (Geneva Twp) Ashtabula Co./Semipublic P/C



Sludge Tank



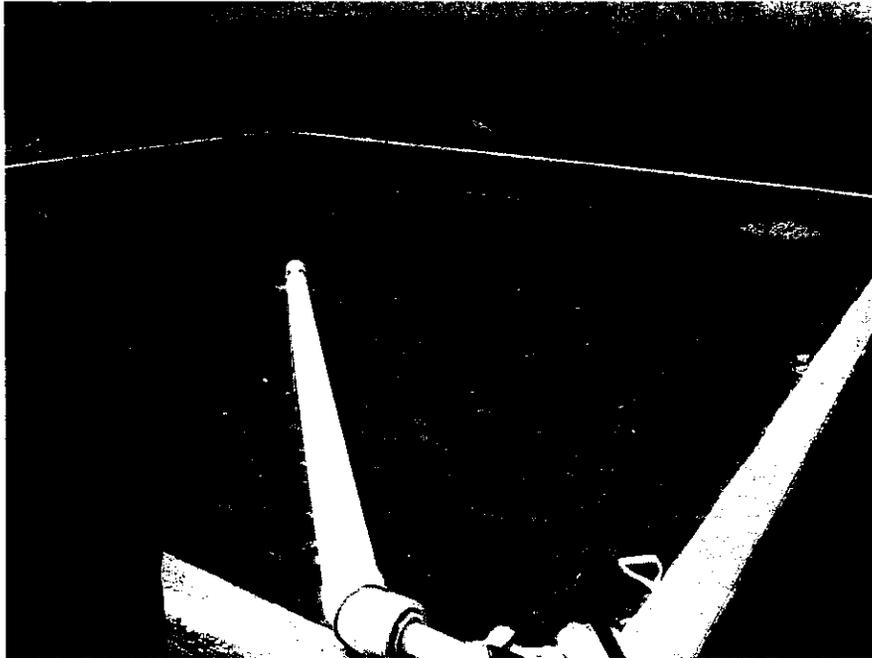
Skimmer and Extended Aeration Clarifier Effluent Weir



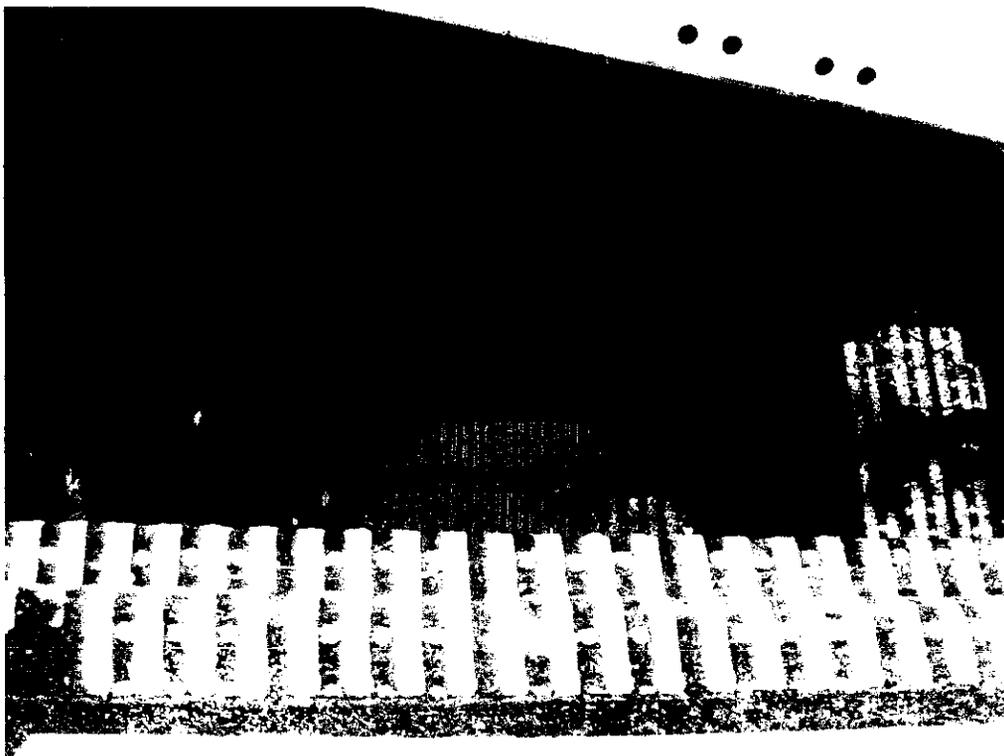
Trash Trap Discharge Repairs 04-27-10 Inspection



Nonfunctioning Skimmer, 04-27-10 Inspection



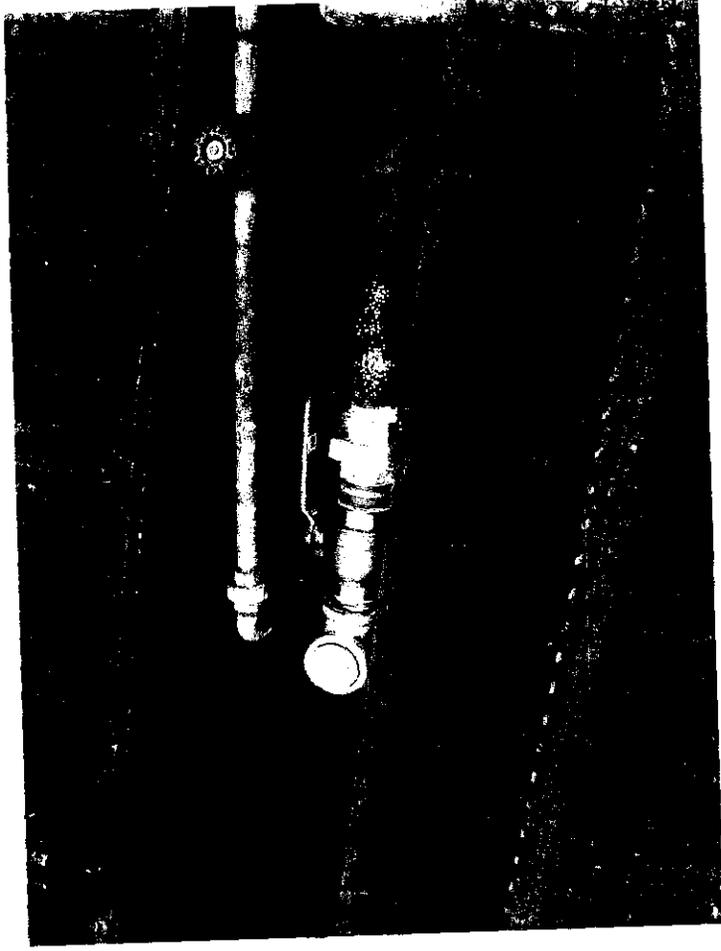
Flooded and Clogged Sand Filter with Debris, 04-27-10 Inspection



Disinfection Chamber, 04-27-10 Inspection



Sludge Tank, 06-02-10 Inspection



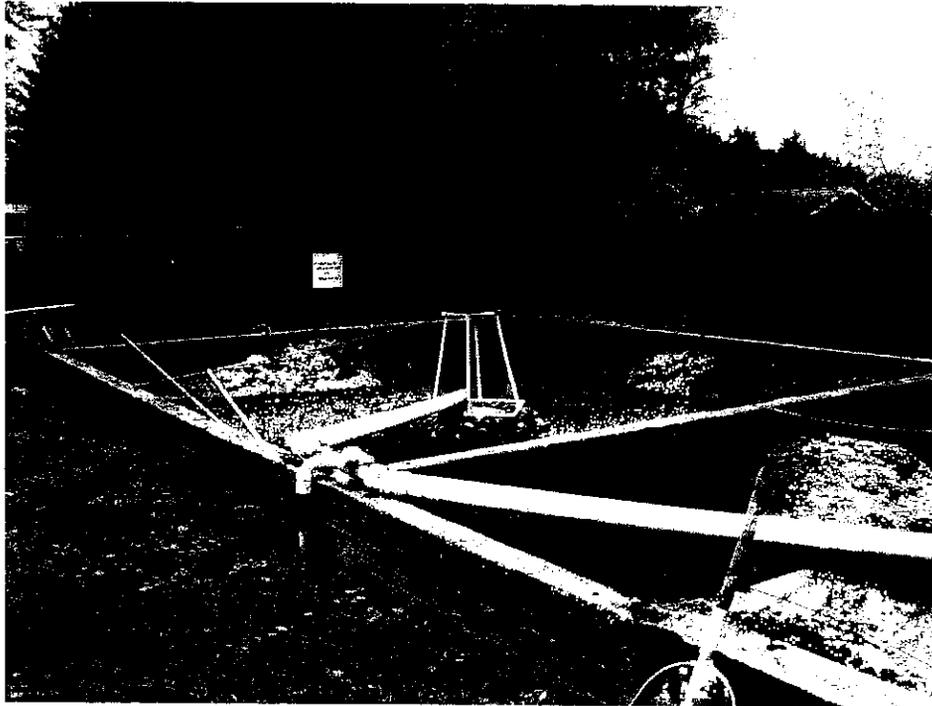
Clarifiers with New Valves, 06-02-10 Inspection



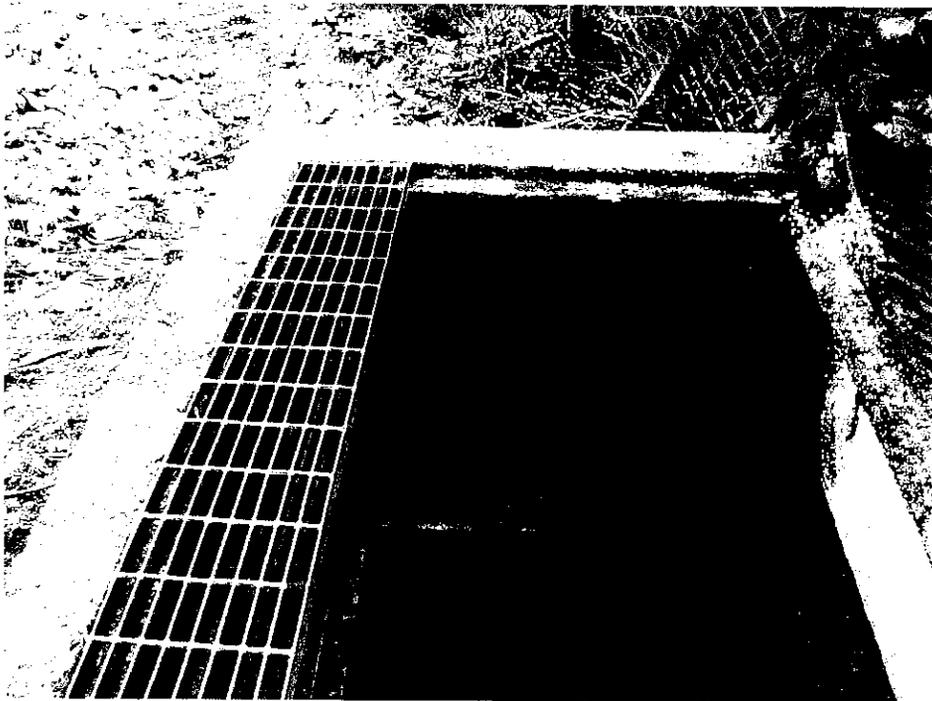
Clarifier Effluent Weir and Skimmer, 06-02-10 Inspection



Sand Filter Distribution Repairs, 06-10-10 Inspection



Sand Filters, 06-10-10 Inspection



Disinfection Tank, 06-10-10 Inspection