



State of Ohio Environmental Protection Agency

Northeast District Office

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

August 1, 2007

RE: ASHTABULA COUNTY
GENEVA TRAILER PARK
OHIO EPA PERMIT NO. 3PV00117
PERMIT VIOLATIONS

Mr. Rudolf Herzog, owner
Geneva Trailer Park
P.O. Box 887
Ashtabula, OH 44005

Dear Mr. Herzog:

On July 23, 2007, a Compliance Evaluation Inspection (CEI) was conducted at the Geneva Trailer Park wastewater treatment plant by the undersigned and Mr. Chris Moody. The purpose of the inspection was to evaluate the operation and maintenance of the plant. As such, evaluations were conducted of the facility's treatment processes and equipment, effluent discharge quality, and general compliance status.

Inspection Findings/Compliance Status

The treatment facility consists of a trash trap, extended aeration with clarification, dosing chamber, slow surface sand filters and a chlorination unit. At the time of the inspection, the general operation and maintenance of the treatment system was rated as **satisfactory**. The following observations, and/or findings were noted:

1. Overall, the facility appeared to be in good working order.
2. There appears to be a buildup of sludge in the system that may need removed.

Upon review of the monthly operating data, the following limit violations were noted:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2006	001	Fecal Coliform	30D Conc	1000	1100	10/1/2006
January 2007	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.85	1/1/2007
January 2007	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	4.85	1/1/2007
January 2007	001	Nitrogen, Ammonia (NH3	30D Qty	0.11	.18357	1/1/2007
January 2007	001	Nitrogen, Ammonia (NH3	7D Qty	0.17	.18357	1/1/2007
January 2007	001	pH	1D Conc	6.5	6.4	1/4/2007
April 2007	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.55	4/1/2007
April 2007	001	Nitrogen, Ammonia (NH3	30D Qty	0.11	.13437	4/1/2007
May 2007	001	Dissolved Oxygen	1D Conc	6.0	2.5	5/1/2007
May 2007	001	Fecal Coliform	30D Conc	1000	1200	5/1/2007
May 2007	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.73	5/1/2007
May 2007	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	1.73	5/1/2007
May 2007	001	Nitrogen, Ammonia (NH3	30D Qty	0.04	.06548	5/1/2007
May 2007	001	Nitrogen, Ammonia (NH3	7D Qty	0.06	.06548	5/1/2007

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The following frequency violations were noted:

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
September 2006	9/1/2006	001	Chlorine, Total Residu	1/2Weeks	1	0
September 2006	9/1/2006	001	Color, Severity	1/Day	1	0
September 2006	9/1/2006	001	Dissolved Oxygen	1/Week	1	0
September 2006	9/1/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/1/2006	001	pH	1/2Weeks	1	0
September 2006	9/1/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/1/2006	001	Water Temperature	1/Week	1	0
September 2006	9/5/2006	001	Color, Severity	1/Day	1	0
September 2006	9/5/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/5/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/6/2006	001	Color, Severity	1/Day	1	0
September 2006	9/6/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/6/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/7/2006	001	Color, Severity	1/Day	1	0
September 2006	9/7/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/7/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/8/2006	001	Color, Severity	1/Day	1	0
September 2006	9/8/2006	001	Dissolved Oxygen	1/Week	1	0
September 2006	9/8/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/8/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/8/2006	001	Water Temperature	1/Week	1	0
September 2006	9/11/2006	001	Color, Severity	1/Day	1	0
September 2006	9/11/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/11/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/12/2006	001	Color, Severity	1/Day	1	0
September 2006	9/12/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/12/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/13/2006	001	Color, Severity	1/Day	1	0
September 2006	9/13/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/13/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/14/2006	001	Color, Severity	1/Day	1	0
September 2006	9/14/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/14/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/15/2006	001	Color, Severity	1/Day	1	0
September 2006	9/15/2006	001	Dissolved Oxygen	1/Week	1	0
September 2006	9/15/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/15/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/15/2006	001	Water Temperature	1/Week	1	0
September 2006	9/18/2006	001	Color, Severity	1/Day	1	0
September 2006	9/18/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/18/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/19/2006	001	Color, Severity	1/Day	1	0
September 2006	9/19/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/19/2006	001	Turbidity, Severity	1/Day	1	0

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September 2006	9/20/2006	001	Color, Severity	1/Day	1	0
September 2006	9/20/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/20/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/21/2006	001	Color, Severity	1/Day	1	0
September 2006	9/21/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/21/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/22/2006	001	Color, Severity	1/Day	1	0
September 2006	9/22/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/22/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/8/2006	001	Dissolved Oxygen	1/Week	1	0
October 2006	10/15/2006	001	Chlorine, Total Residu	1/2Weeks	1	0
October 2006	10/15/2006	001	Dissolved Oxygen	1/Week	1	0
October 2006	10/15/2006	001	pH	1/2Weeks	1	0
October 2006	10/22/2006	001	Dissolved Oxygen	1/Week	1	0
November 2006	11/2/2006	001	Color, Severity	1/Day	1	0
November 2006	11/2/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/2/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/3/2006	001	Color, Severity	1/Day	1	0
November 2006	11/3/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/3/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/6/2006	001	Color, Severity	1/Day	1	0
November 2006	11/6/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/6/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/7/2006	001	Color, Severity	1/Day	1	0
November 2006	11/7/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/7/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/8/2006	001	Color, Severity	1/Day	1	0
November 2006	11/8/2006	001	Dissolved Oxygen	1/Week	1	0
November 2006	11/8/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/8/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/9/2006	001	Color, Severity	1/Day	1	0
November 2006	11/9/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/9/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/10/2006	001	Color, Severity	1/Day	1	0
November 2006	11/10/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/10/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/13/2006	001	Color, Severity	1/Day	1	0
November 2006	11/13/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/13/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/14/2006	001	Color, Severity	1/Day	1	0
November 2006	11/14/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/14/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/15/2006	001	Color, Severity	1/Day	1	0
November 2006	11/15/2006	0.01	Dissolved Oxygen	1/Week	1	0
November 2006	11/15/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/15/2006	001	pH	1/2Weeks	1	0
November 2006	11/15/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/16/2006	001	Color, Severity	1/Day	1	0

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November 2006	11/16/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/16/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/17/2006	001	Color, Severity	1/Day	1	0
November 2006	11/17/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/17/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/20/2006	001	Color, Severity	1/Day	1	0
November 2006	11/20/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/20/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/21/2006	001	Color, Severity	1/Day	1	0
November 2006	11/21/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/21/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/22/2006	001	Color, Severity	1/Day	1	0
November 2006	11/22/2006	001	Dissolved Oxygen	1/Week	1	0
November 2006	11/22/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/22/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/24/2006	001	Color, Severity	1/Day	1	0
November 2006	11/24/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/24/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/27/2006	001	Color, Severity	1/Day	1	0
November 2006	11/27/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/27/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/28/2006	001	Color, Severity	1/Day	1	0
November 2006	11/28/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/28/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/29/2006	001	Color, Severity	1/Day	1	0
November 2006	11/29/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/29/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/30/2006	001	Color, Severity	1/Day	1	0
November 2006	11/30/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/30/2006	001	Turbidity, Severity	1/Day	1	0
December 2006	12/1/2006	001	Dissolved Oxygen	1/Week	1	0
December 2006	12/15/2006	001	Dissolved Oxygen	1/Week	1	0
December 2006	12/15/2006	001	pH	1/2Weeks	1	0
December 2006	12/22/2006	001	Dissolved Oxygen	1/Week	1	0
January 2007	1/8/2007	001	Dissolved Oxygen	1/Week	1	0
January 2007	1/15/2007	001	Dissolved Oxygen	1/Week	1	0
January 2007	1/15/2007	001	pH	1/2Weeks	1	0
January 2007	1/22/2007	001	Dissolved Oxygen	1/Week	1	0
February 2007	2/8/2007	001	Dissolved Oxygen	1/Week	1	0
February 2007	2/15/2007	001	Dissolved Oxygen	1/Week	1	0
February 2007	2/15/2007	001	pH	1/2Weeks	1	0
February 2007	2/22/2007	001	Dissolved Oxygen	1/Week	1	0
March 2007	3/8/2007	001	Dissolved Oxygen	1/Week	1	0
March 2007	3/15/2007	001	Dissolved Oxygen	1/Week	1	0
March 2007	3/15/2007	001	pH	1/2Weeks	1	0
March 2007	3/22/2007	001	Dissolved Oxygen	1/Week	1	0
April 2007	4/4/2007	001	Odor, Severity	1/Day	1	0
April 2007	4/8/2007	001	Dissolved Oxygen	1/Week	1	0

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April 2007	4/10/2007	001	Odor, Severity	1/Day	1	0
April 2007	4/15/2007	001	Dissolved Oxygen	1/Week	1	0
April 2007	4/15/2007	001	pH	1/2Weeks	1	0
April 2007	4/22/2007	001	Dissolved Oxygen	1/Week	1	0
May 2007	5/1/2007	001	Chlorine, Total Residu	1/2Weeks	1	0
May 2007	5/8/2007	001	Dissolved Oxygen	1/Week	1	0
May 2007	5/15/2007	001	Dissolved Oxygen	1/Week	1	0
May 2007	5/15/2007	001	pH	1/2Weeks	1	0
May 2007	5/22/2007	001	Dissolved Oxygen	1/Week	1	0

Although the facility appears to be in good working order with few limit violations, too many frequency violations have occurred. We understand that Valley Environmental has been routinely submitting monthly operating reports for the facility. Changes should be made with them to prevent future violations with respect to your frequency testing. Also, pursuant to Part III of the NPDES permit, all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22. 40 CFR 122.22 (b) states:

A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***
- (3) The written authorization is submitted to the Director.***

As such, reports for companies can only be signed and certified by a corporate officer, general partner, proprietor, or by a duly authorized representative of said individual. Also, in accordance with Ohio Administrative Code (OAC) 3745-7-02, a copy of the contract with your certified operator must be immediately submitted to Ohio EPA for approval. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the daily services (i.e., **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. The contract period shall not exceed three (3) years, but may be renewable. Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of the contract for submission of Monthly Operating Reports utilizing SWIMware.

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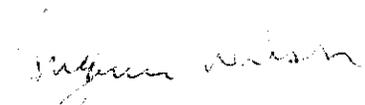
Summary/Conclusion

Based on the foregoing information, Geneva Trailer Park is considered to be in **substantial compliance** with the terms and conditions of the NPDES permit. However, failure to rectify the frequency violations could result in an enforcement action which may impose fines at a rate of \$10,000 per day per violation.

The above noted authorization letter and a copy of the contract with Valley Environmental should be submitted to this writer immediately for review.

If there are any questions or comments regarding this notification, please contact this office.

Respectfully,



Virginia Wilson, P.E.
Geological Engineer
Division of Surface Water

VW/mt

cc: Jamie Miller, The Miller Realty Company

File: Semi-Public/Ashtabula/Geneva/Geneva Trailer Park