



March 7, 2011

RE: COUNTRY SQUIRE MHP
OEPA PERMIT # 3PV00130
COMPLIANCE EVALUATION INSPECTION
S.R. 62 AND KNOX SCHOOL ROAD
KNOX TOWNSHIP
COLUMBIANA COUNTY

NOTICE OF VIOLATION

Mr. Ronald Holley
Country Squire Estates, Ltd.
P.O. Box 157
Clinton, OH 44216

Dear Mr. Holley:

On February 9, 2011, this writer conducted a compliance evaluation inspection of the Country Squire MHP Treatment Plant. This correspondence is being provided as an update of the park's current status since you are coordinating with the bankruptcy courts. The wastewater treatment plant is currently producing a marginal effluent and there are many noncompliance issues with the Ohio Revised Code. The Country Squire MHP is considered to be in significant noncompliance.

The following is a summary of our observations:

- 1) The trash trap was not inspected.
- 2) The aeration tank had a good color. Some of the diffusers were not operational. The effluent had solids going over the weir. This facility did not have any filters or chlorination/dechlorination facilities.
- 3) The facility was originally approved on June 29, 1967, for a maximum of 58 trailer spaces at a design flow of 150 gpd. The current licenses issued by the Columbiana Health Department states that 66 park lots are occupied. At our current design flow of 300 gpd per mobile home the expected design flow would be 19,800 gpd. The existing facilities (a 10,000-gpd Topco WWTP) do not meet our current design criteria.
- 4) The treatment plant discharged to the creek on the south side of the property according to the original approval. The final effluent discharges to a small unnamed tributary of the Mahoning River.

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- 5) The National Pollutant Discharge Elimination System (NPDES) permit for this treatment plant was effective on August 1, 2009.

Non Compliance Issues

The mobile home park is considered to be in significant noncompliance for the following violations of its current NPDES permit:

- 1) Part I, A, Final Outfall: The facility is violating the final effluent limits at the final outfall of the wastewater treatment plant. The violations are attached.
- 2) Part I, C, Schedule of Compliance: Detail Plans for improvements to comply with the final effluent limits was to have been submitted by February 1, 2010. To date this office has not received a permit to install for the necessary improvements. Construction of the new facilities was to have been completed by February 1, 2011. The improvements have not been installed.
- 3) Parts II, J., by no later than January 31, of each calendar year submit an annual sludge report. This office has not received the sludge report.
- 4) Part II, K.: Failure to erect a stream marker on the stream bank at the regulated outfall.

It is our experience the existing facilities will not meet the above discharge criteria. The following treatment structures must be added to the existing wastewater treatment plant in order to discharge adequately treated wastewater and to upgrade the treatment system to current standards:

- a) Tertiary sand filters to filter any solids prior to discharge must be added to the system. The sand filters will enable the system to meet the solids limit that is established in the NPDES permit. A dosing chamber with dual alternating submersible pumps must be installed before the filters to properly dose them.
- b) A chlorination/dechlorination system to disinfect the wastewater prior to discharge must be added to the treatment system.
- c) A second, redundant air blower must be added to the treatment system. The existing blower and the new blower must be periodically alternated to ensure their operation.
- d) A flow meter must be added in order to report actual flow from the treatment system. The flow meter must be properly sized. As an alternative, dosing pumps used to dose the sand filters may be fitted with hour meters to measure flow through the treatment system.

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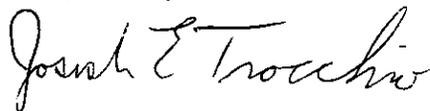
- e) A sludge holding tank will be necessary to store sludge removed from the clarifier until it can be hauled away for proper disposal. It is necessary to maintain a proper solids balance within the aeration tank and clarifier for proper treatment of the wastewater.
- f) A flow equalization tank will be necessary to minimize peak flows at the wastewater treatment plant due to leaking sewers and storm events. Flow equalization will help reduce peak flows that can cause plant upsets.
- g) An engineering evaluation of the existing trash trap and extended aeration wastewater treatment plant will be necessary to insure they are adequate to handle the park's existing capacity for mobile homes. The plant must be evaluated for compliance with "Sewage: Collection, Treatment & Disposal", the Agency design document for small wastewater treatment systems. If these units are not adequate for the Agency's current design standards, then they must be replaced.

Schedule

Any future owner will need to request a permit modification to revise the schedule of compliance to upgrade the wastewater treatment facilities.

Should you have any comments or questions, feel free to contact me at (330) 963-1193.

Respectfully,



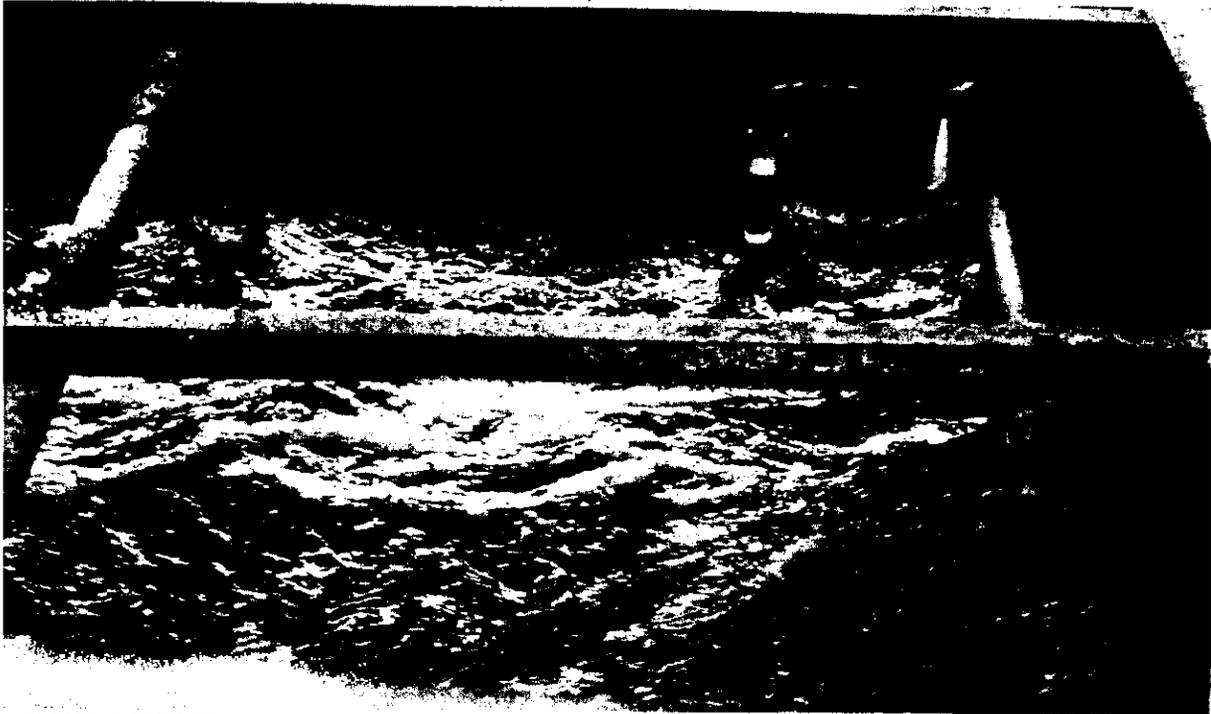
Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

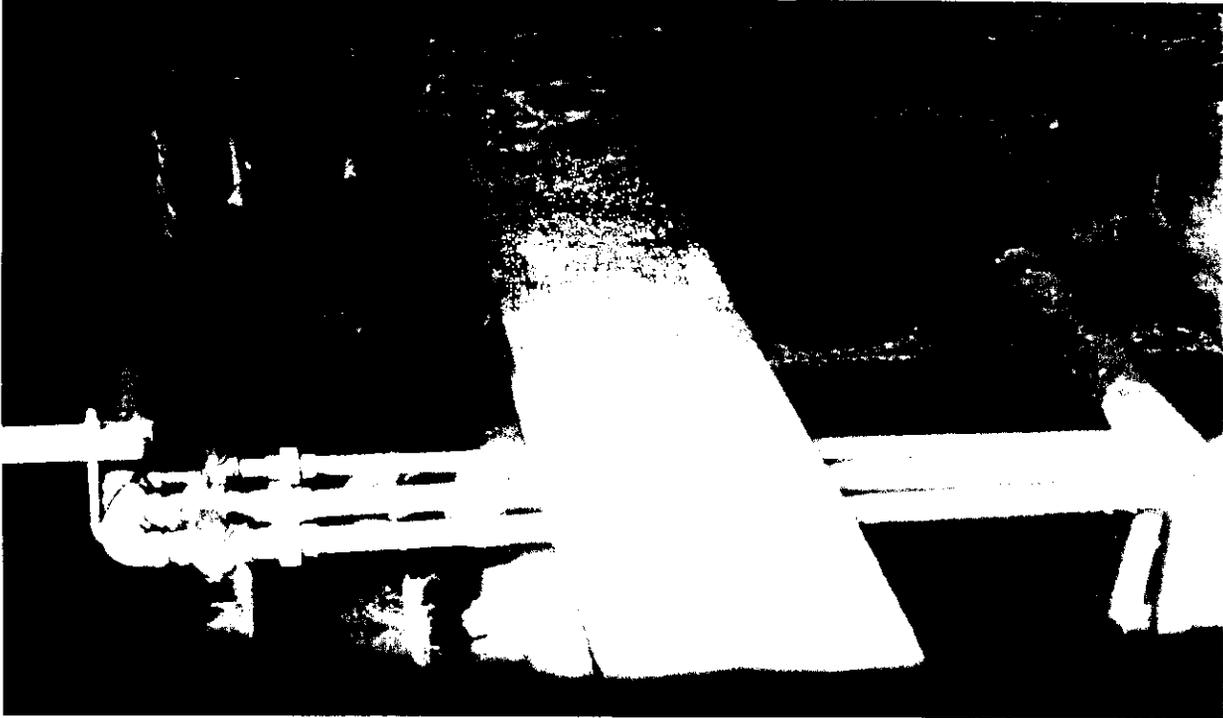
cc: Lori J. Barnes, R.S., Columbiana County Health Department

File: Semipublic/Columbiana County/Knox Township/Country Squire MHP

JANUARY 27, 2010, INSPECTION PHOTOS



SOME OF THE DIFFUSERS ARE INOPERABLE AND MAY NEED CLEANED



SOLIDS GOING OUT THE EFFLUENT WIER

COUNTRY SQUIRE MHP EFFLUENT VIOLATIONS: AUG 2009 - JAN 2011

| Permit No | Reporting Period | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|------------------------|------------|-------|----------------|----------------|
| 3PV00130*AD | April 2010 | Total Suspended Solids | 30D Conc | 30 | 468. | 4/1/2010 |
| 3PV00130*AD | April 2010 | Total Suspended Solids | 7D Conc | 45 | 468. | 4/15/2010 |
| 3PV00130*AD | April 2010 | CBOD 5 day | 30D Conc | 30 | 236. | 4/1/2010 |
| 3PV00130*AD | April 2010 | CBOD 5 day | 7D Conc | 45 | 236. | 4/15/2010 |
| 3PV00130*AD | April 2010 | pH | 1D Conc | 6.5 | 5. | 4/5/2010 |
| 3PV00130*AD | February 2010 | Total Suspended Solids | 30D Conc | 30 | 48. | 2/1/2010 |
| 3PV00130*AD | February 2010 | Total Suspended Solids | 7D Conc | 45 | 48. | 2/22/2010 |
| 3PV00130*AD | February 2010 | CBOD 5 day | 30D Conc | 30 | 108. | 2/1/2010 |
| 3PV00130*AD | February 2010 | CBOD 5 day | 7D Conc | 45 | 108. | 2/22/2010 |
| 3PV00130*AD | July 2010 | Total Suspended Solids | 30D Conc | 30 | 48. | 7/1/2010 |
| 3PV00130*AD | July 2010 | Total Suspended Solids | 7D Conc | 45 | 48. | 7/15/2010 |
| 3PV00130*AD | March 2010 | Total Suspended Solids | 30D Conc | 30 | 86. | 3/1/2010 |
| 3PV00130*AD | March 2010 | Total Suspended Solids | 7D Conc | 45 | 86. | 3/15/2010 |
| 3PV00130*AD | March 2010 | CBOD 5 day | 30D Conc | 30 | 92.2 | 3/1/2010 |
| 3PV00130*AD | March 2010 | CBOD 5 day | 7D Conc | 45 | 92.2 | 3/15/2010 |
| 3PV00130*AD | January 2010 | Total Suspended Solids | 30D Conc | 30 | 67.5 | 1/1/2010 |
| 3PV00130*AD | January 2010 | Total Suspended Solids | 7D Conc | 45 | 67.5 | 1/22/2010 |
| 3PV00130*AD | January 2010 | CBOD 5 day | 30D Conc | 30 | 52.2 | 1/1/2010 |
| 3PV00130*AD | January 2010 | CBOD 5 day | 7D Conc | 45 | 52.2 | 1/15/2010 |
| 3PV00130*AD | October 2009 | Total Suspended Solids | 30D Conc | 30 | 52.6 | 10/1/2009 |
| 3PV00130*AD | October 2009 | Total Suspended Solids | 7D Conc | 45 | 52.6 | 10/22/2009 |
| 3PV00130*AD | November 2010 | Total Suspended Solids | 30D Conc | 30 | 31.5 | 11/1/2010 |