



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 16, 2007

RE: MAHONING COUNTY
MILTON TWP.
M&C MHP
NPDES PERMIT NO. 3PV00089

*NOTICE OF VIOLATION

Mr. Richard Sickler, Owner
M&C Mobile Village
480 15th Street, NW
Barberton, OH 44203

Dear Mr. Sickler:

On July 10, 2007, an unannounced Compliance Evaluation Inspection (CEI) of the M&C MHP wastewater treatment system was conducted by this writer. The intent of the inspection was to evaluate operations and maintenance of the facility. In addition, the compliance record for the facility was reviewed.

The condition of the treatment system was again found to be unsatisfactory at the time of the inspection. Following are observations made during the inspection.

- 1) The aeration tank had good color.
- 2) At the time of the inspection, Ed Mosko of Valley Environmental Labs, Inc. was installing the flow monitoring system. The system is necessary to monitor response of the system to storm events.
- 3) In order to install the flow meter, Mr. Mosko had to pump down the contents of the narrow tank located between the clarifier and the dosing tank. The contents of the liquid being pumped appeared black and anaerobic like sewage sludge. The material was pumped into the dosing tank.

In the event the black liquid is pumped from the dosing tank to the sand filter, the sludge will cause greater problems with the sand filters. The material should have been removed from the system by using a septage hauler to haul the material off-site. Transferring the material to the dosing tank with the possibility of the material being pumped to the sand filters was inappropriate. A septage hauler should immediately pump the dosing tank and the adjacent narrow tank and haul the black, anaerobic material off-site.

- 4) The sand filters show no improvement relative to the April 19, 2007, inspection when this writer met with Mike Rice and Brian Mosko. The western-most filter was dry, but covered with what appeared to be dead weeds. This filter was not in use during the inspection. The eastern-most filter remains in a state of disrepair and appears to be unusable. The center filter was in use at the time of this inspection. The filter was covered with weeds and black, septic water. The condition of the sand filters remains unsatisfactory.
- 5) The disinfection tank was covered with weeds and was nearly inaccessible. Chlorine tablets were identified, but de-chlorination tablets were not in the system. In addition, the outlet from the disinfection tank was clogged. Actions that must be immediately taken is to clear the weeds around the disinfection tank, clear the outlet clog, and insert de-chlorination tablets into the tablet holder. Be advised that chlorine and de-chlorination tablets must be maintained in the system at all times during the period of May 1 through October 31 of each year. The condition of the disinfection system was unacceptable at the time of the inspection.
- 6) The stream appeared to be impacted by the discharge of wastewater from the mobile home park. The stream downstream of the discharge location was discolored. The discoloration of the stream sediment constitutes a violation of Ohio Administrative Code 3745-1-04 and Ohio Revised Code 6111.04. Such violations are subject to enforcement actions including the possibility of fines up to \$10,000.00 per day per violation.

Compliance Review

The compliance record for the treatment plant was reviewed as part of this inspection. The record of review was the Monthly Operating Reports from March through June 2007. Following is a list of limit violations recorded for the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	Total Suspended Solids	30D Conc.	12	14.	3/1/2007
March 2007	Total Suspended Solids	30D Qty.	0.91	1.0598	3/1/2007
March 2007	Nitrogen, Ammonia	30D Conc.	4.5	7.36	3/1/2007
March 2007	Nitrogen, Ammonia	30D Qty.	0.34	.55715	3/1/2007
March 2007	CBOD 5 day	30D Conc.	10	28.	3/1/2007
March 2007	CBOD 5 day	30D Qty.	0.76	2.1196	3/1/2007
March 2007	Nitrogen, Ammonia	1D Conc.	6.75	7.36	3/6/2007
March 2007	Nitrogen, Ammonia	1D Qty.	0.51	.55715	3/6/2007

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	CBOD 5 day	1D Conc.	15.0	28.	3/6/2007
March 2007	CBOD 5 day	1D Qty.	1.14	2.1196	3/6/2007
March 2007	Dissolved Oxygen	1D Conc.	6.0	4.9	3/20/2007
March 2007	Dissolved Oxygen	1D Conc.	6.0	5.3	3/27/2007
April 2007	Total Suspended Solids	30D Conc.	12	20.	4/1/2007
April 2007	Total Suspended Solids	30D Qty.	0.91	1.514	4/1/2007
April 2007	Nitrogen, Ammonia	30D Conc.	4.5	11.	4/1/2007
April 2007	Nitrogen, Ammonia	30D Qty.	0.34	.8327	4/1/2007
April 2007	Total Suspended Solids	1D Conc.	18.0	20.	4/3/2007
April 2007	Total Suspended Solids	1D Qty.	1.36	1.514	4/3/2007
April 2007	Nitrogen, Ammonia	1D Conc.	6.75	11.	4/3/2007
April 2007	Nitrogen, Ammonia	1D Qty.	0.51	.8327	4/3/2007
May 2007	Dissolved Oxygen	1D Conc.	6.0	5.9	5/22/2007
May 2007	Dissolved Oxygen	1D Conc.	6.0	4.9	5/29/2007
June 2007	Nitrogen, Ammonia	30D Conc.	1.5	3.09	6/1/2007
June 2007	Nitrogen, Ammonia	30D Qty.	0.11	.23391	6/1/2007
June 2007	Nitrogen, Ammonia	1D Conc.	2.25	3.09	6/5/2007
June 2007	Nitrogen, Ammonia	1D Qty.	0.17	.23391	6/5/2007
June 2007	Dissolved Oxygen	1D Conc.	6.0	4.2	6/5/2007
June 2007	Dissolved Oxygen	1D Conc.	6.0	5.	6/12/2007
June 2007	Dissolved Oxygen	1D Conc.	6.0	3.8	6/21/2007
June 2007	Dissolved Oxygen	1D Conc.	6.0	5.5	6/28/2007

In addition to the limit violation noted above, the following violations of the NPDES Permit were again identified.

1. Failure to properly maintain the treatment system constitutes a violation of Part III. Item 3.A of the permit.
2. Failure to report violations to OhioEPA within 24 hrs becoming aware of violations constitute violations of Part III, Item 12 of the permit.
3. An air line was constructed to the disinfection tank. This constitutes a modification of the treatment system without a Permit-to-Install from Ohio EPA. This is a violation of Ohio Administrative Code 3745-42.

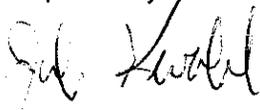
Each of the violations identified above constitute violations of Ohio Revised Code 6111.07. Such violations are subject to fines of up to \$10,000.00 per day per violation.

A response must be provided to this office describing actions that will be taken to return the treatment system to consistent compliance. At a minimum, the response must describe how the filters will be cleaned and re-furbished. Finally, the response must provide the name and telephone number of the certified operator for the system. The response must be provided no later than August 15, 2007.

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You may contact this office at (330) 963-1251 to discuss any questions you may have regarding this inspection report.

Respectfully

A handwritten signature in black ink, appearing to read "John Kwolek". The signature is written in a cursive style with a large initial "J".

John Kwolek
District Engineer
Division of Surface Water

JK:bo

cc. Joe Mansky, Mahoning County Department of Health
Brian Mosko, Valley Environmental Labs, Inc.
Mike Rice, Park Manager, M&C MHP