



State of Ohio Environmental Protection Agency

Northeast District Office

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

August 25, 2009

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

Mr. Mitchell A. Naumoff
Office 156 6th St. NW
Barberton, OH 44203

Dear Mr. Naumoff:

On July 14, 2009, 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. The compliance record for the facility was also reviewed as part of this CEI.

Observations

- The aeration tank was a medium brown color at the time of the inspection.
- The flow monitoring trough was observed to have scum and sludge deposits that could have been affecting flow monitoring on the day of the inspection. The trough needs to be cleaned immediately and then cleaned weekly to prevent material from re-depositing.
- Sludge was identified floating in the dosing tank. The dosing tank should be cleaned and any floating sludge should be removed from the tank on a daily basis.
- No chlorination tablets were present in the tablet holder at the time of the inspection. Only de-chlorination tablets were present. Chlorination tablets must be kept in the system at all times during the disinfection season of May through October. This operational issue was identified in the previous inspection report dated May 14, 2009. The disinfection system must be checked daily and disinfection tablets must be added as needed.
- The effluent discharging at the time of the inspection was clear and odorless.
- The sand filters have not been upgraded despite a proposal by the park to upgrade the filters and other parts of the treatment system. A Permit-to-Install from Ohio EPA was issued on December 16, 2008 approving the plant upgrades.

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 May 2009 through July 2009. Following is a list of limit violations recorded for the review period.

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2009	Dissolved Oxygen	1D Conc.	6.0	3.9	5/14/2009
July 2009	Dissolved Oxygen	1D Conc.	6.0	4.8	7/15/2009

In addition to the limit violations noted above, the following frequency violations were identified.

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2009	Color, Severity	1/Day	1	0	05/22/2009
May 2009	Odor, Severity	1/Day	1	0	05/22/2009
May 2009	Turbidity, Severity	1/Day	1	0	05/22/2009
July 2009	Color, Severity	1/Day	1	0	07/22/2009
July 2009	Color, Severity	1/Day	1	0	07/29/2009
July 2009	Odor, Severity	1/Day	1	0	07/22/2009
July 2009	Odor, Severity	1/Day	1	0	07/29/2009
July 2009	Turbidity, Severity	1/Day	1	0	07/22/2009
July 2009	Turbidity, Severity	1/Day	1	0	07/29/2009

M&C MHP must submit analytical results each month at the frequency required by the permit. This is the second inspection where the M&C MHP has not reported at the correct frequency. The parameters above are simple observations that are to be made daily. The individual responsible for the daily inspections must record and report the necessary observations.

Plant Upgrades

On December 16, 2008, the M&C MHP received approval for proposed plant upgrades. The upgrades included installation of an equalization tank, modifying the clarifier and the dosing tank, installing new sand filters, and converting the dosing tank into a sludge holding tank. The upgrades had not been initiated at the time of this inspection.

The condition of the eastern-most filter reduces the capacity of the treatment plant since the filter is unusable. In addition, the clarifier is insufficient to treat the current design flow. The plant upgrades were intended to increase the capacity of the clarifier and to provide new filters that do not leak through the filter walls as was observed during a previous inspection. The upgrades were also necessary to provide aerated sludge storage capacity at the plant.

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In addition to authorizing the installation of the plant upgrades, the Permit-to-Install required the M&C mobile home park to submit an NPDES Permit modification request to reduce the design flow from 20,000 gpd to 10,000 gpd. The special condition of the Permit-to-Install was as follows.

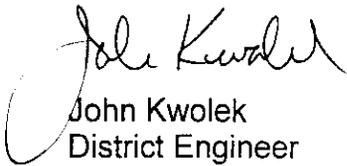
"Within 30 days of the date of this Permit-to-Install, the M&C Mobil Village shall submit to Ohio EPA, an application to modify the NPDES Permit. The requested modification will be to revise the design average daily flow of the treatment plant to 10,000 gallons per day. The application for requesting the permit modification can be found at the following Web address: http://www.epa.state.oh.us/dsw/permits/NPDESModForm_fis.pdf".

This reduced flow was necessary to bring the design flow of the treatment system in-line with the proposed modified sand filters and clarifier design. The NPDES Permit modification was to be submitted no later than January 16, 2009.

The plant upgrades should be initiated immediately and be completed by the end of November 2009. A permit modification application requesting a reduction of the design average daily flow of the plant must be submitted to this office no later September 25, 2009. A response to this inspection report must be provided confirming the start date of construction. The response should be provided to this office no later than September 11, 2009.

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

Respectfully


John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Joe Mansky, Mahoning County Department of Health