



State of Ohio Environmental Protection Agency

Northeast District Office

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

August 13, 2007

RE: MAHONING COUNTY
COITSVILLE TWP
STATELINE MHP
NPDES PERMIT NO. 3PV00088
2008 CEI

Mr. Ron Holley
P.O. Box 157
Clinton, OH 44216

Dear Mr. Holley:

On August 7, 2007, this writer inspected the wastewater treatment system for the Stateline Mobile Home Park. Just prior to the inspection, a storm of approximately 2.5 in. passed through the area. The intent of the inspection was to monitor the condition of the treatment system and to monitor how the treatment system reacts to storm events.

Observations

The treatment system was unsatisfactory and appeared to be severely impacted by the rain event. A significant flow was entering the plant and the clarifier was surcharged. The outlet trough following the clarifier was full of wastewater and the weir trough in the clarifier was submerged under approximately four inches of water.

The blower was off during the inspection. The contents of the aeration tank and the clarifier appeared to be muddy water from the storm. The southwest corner of the system had black water on the surface of the concrete indicating the tank had apparently overflowed during the rain event.

Of particular concern was that the outlet trough had fecal material that was eventually discharged from the system to the receiving stream. The fecal material was pushed through the system during the rain event.

The wastewater treatment system does not have a disinfection system to disinfect the wastewater prior to discharge. Chlorine tablets are placed in the clarifier in an attempt to disinfect wastewater. However, such a system is only temporary until a new disinfection tank can be installed.

Compliance Review

As part of this inspection, the compliance record for the Stateline MHP was reviewed. The period of review was July 2006 through June 2007. Following are permit violations identified during the review period.

Limit Violations

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
Sep. 2006	TSS	30D Conc.	12.0	17	9/1/2006
Sep. 2006	TSS	30D Qty.	0.44	0.59841	9/1/2006
Dec. 2006	TSS	30D Conc.	12.0	58	12/1/2006
Dec. 2006	TSS	7D Conc.	18.0	58	12/15/2006
May 2007	Nitrogen, Ammonia	30D Conc.	2.0	4.19	5/1/2007
June 2007	Nitrogen, Ammonia	30D Conc.	2.0	14	6/1/2007
June 2007	Nitrogen, Ammonia	30D Qty.	0.07	0.15367	6/1/2007
June 2007	Nitrogen, Ammonia	7D Conc.	3.0	14	6/15/2007
June 2007	Nitrogen, Ammonia	7D Qty.	0.11	0.15367	6/15/2007

Frequency Violations for Non-reporting

Reporting Period	Violation Date	Parameter	Sample Frequency	Expected	Reported
July 2006	7/1/2006	Chlorine, Total Residual	1/2Weeks	1	0
July 2006	7/15/2006	Chlorine, Total Residual	1/2Weeks	1	0
Aug. 2006	8/1/2006	Chlorine, Total Residual	1/2Weeks	1	0
Aug. 2006	8/15/2006	Chlorine, Total Residual	1/2Weeks	1	0
Aug. 2006	8/1/2006	pH	1/2Weeks	1	0
Sep. 2006	9/1/2006	Chlorine, Total Residual	1/2Weeks	1	0
Sep. 2006	9/15/2006	Chlorine, Total Residual	1/2Weeks	1	0
Jan. 2007	1/1/2007	Dissolved Oxygen	1/Week	1	0
May 2007	5/1/2007	Chlorine, Total Residual	1/2Weeks	1	0
May 2007	5/15/2007	Chlorine, Total Residual	1/2Weeks	1	0
May 2007	5/22/2007	Dissolved Oxygen	1/Week	1	0
June 2007	6/1/2007	Chlorine, Total Residual	1/2Weeks	1	0
June 2007	6/15/2007	Chlorine, Total Residual	1/2Weeks	1	0

Be advised that limit and frequency violations of the NPDES Permit constitute violations of Ohio Revised Code 6111.04 and are subject to enforcement action including fines of \$10,000.00 per day per violation.

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Necessary Upgrades for Compliance

In addition to the limit and frequency violations noted above, Stateline MHP is in violation of the construction schedule included in Part I.C of the NPDES Permit. The schedule required that the system be upgraded in order to consistently comply with the fecal coliform and residual chlorine limits. However, based on observations during the recent inspection, the following upgrades to the treatment system must be made.

1. Installation of a new trash trap;
2. Installation of an equalization tank at the front of the system;
3. Installation of two new blowers;
4. Installation of a new clarifier weir trough;
5. Installation of a new dosing system and slow surface sand filters; and
6. Installation of a new aerated sludge holding tank.

The aeration tank and the clarifier must be evaluated for compliance with the design criteria established by Ohio EPA in the guidance manual, "Sewage: Collection, Treatment and Disposal Where Public Sewers are Not Available." The guidance document is available at the following web address:

<http://www.epa.state.oh.us/dsw/guidance/guidance.html>

In addition, the new processes identified above must be properly designed in accordance with the Ohio EPA guidance manual.

Required Permit-to-Install

A Permit-to-Install application for the plant upgrades must be submitted to this office no later than October 31, 2007. Failure to submit the permit-to-install application by October 31, 2007, will result in this writer initiating enforcement action against the Stateline MHP.

Mobile Home Park License

This letter is being forwarded to the Mahoning County Department of Health. This letter is notification that the wastewater system is considered a nonfunctioning system because of its inability to consistently comply with the requirements of the NPDES Permit. Be advised that licensing of the mobile home park is dependent on, among other requirements, maintenance of a functioning wastewater treatment system. Failure to properly upgrade the system will result in a recommendation by this writer to cancel the park's license.

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Response Required

You must provide a written response to this inspection report. The response must be provided no later than August 31, 2007. Failure to submit the required response will result in referral of the State Line MHP for enforcement action. The response must include a commitment to properly upgrade the treatment system as described above and a commitment to submit the Permit-to-Install application no later than October 31, 2007.

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:bo

cc. Joe Mansky, Mahoning County Department of Health

File: Semi-public/Mahoning Co./Coitsville Twp./Stateline MHP