



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 14, 2010

RE: MAHONING COUNTY  
COITSVILLE TWP  
STATELINE MHP  
NPDES PERMIT NO. 3PV00088  
2010 CEI AND NOTICE OF VIOLATION

**CERTIFIED MAIL**

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

Dear Mr. Holley:

On January 6, 2010, this writer inspected the wastewater treatment system for the Stateline Mobile Home Park. The intent of the inspection was to monitor the condition of the treatment system and to evaluate compliance with the NPDES Permit. The inspection also was intended to determine if the system had been upgraded as required by the NPDES Permit and as approved by PTI No. 656182 on April 22, 2009.

**Observations**

The treatment system was unsatisfactory at the time of the inspection. Following are observations during the inspection.

- 1) The content of the aeration tank had good color and mixing. The color of the liquid in the tank was chocolate brown.
- 2) The clarifier remains in need of replacement. The weir has no v-notched plates attached to the sides of the effluent trough and the clarifier appears to be undersized. The clarifier continues to be unsatisfactory.
- 3) There is not disinfection system at the plant. Attempts at disinfection continue to occur in the clarifier with no dechlorination of the wastewater prior to discharge. The method of disinfection continues to be satisfactory.
- 4) No sand filters are present at the plant. Therefore, any solids that are discharged from the clarifier are also discharged to waters of the state. The plant upgrade previously approved by this office includes slow surface sand filters to be installed for tertiary treatment of the wastewater prior to discharge.
- 5) The new equalization tank had not been installed at the time of the inspection. The equalization tank must be installed as approved to address concerns regarding inflow and infiltration to the system. In addition, surface drainage directly into the aeration tank must be diverted around the system to prevent the washout of solids.

**Compliance Review**

As part of this inspection, the compliance record for the Stateline MHP was reviewed. The period of review was July 2008 through November 2009. Following is a list of limit violations identified during the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2008	Total Suspended Solids	30D Conc	12.0	18.	7/1/2008
July 2008	Fecal Coliform	30D Conc	1000	95000.	7/1/2008
July 2008	Dissolved Oxygen	1D Conc	6.0	4.	7/7/2008
July 2008	Dissolved Oxygen	1D Conc	6.0	5.	7/14/2008
July 2008	Fecal Coliform	7D Conc	2000	95000.	7/15/2008
July 2008	Chlorine, Total Residu	1D Conc	0.019	.06	7/16/2008
July 2008	Dissolved Oxygen	1D Conc	6.0	5.1	7/16/2008
July 2008	Chlorine, Total Residu	1D Conc	0.019	.05	7/21/2008
July 2008	Dissolved Oxygen	1D Conc	6.0	4.	7/21/2008
July 2008	Dissolved Oxygen	1D Conc	6.0	5.	7/28/2008
August 2008	Total Suspended Solids	30D Conc	12.0	21.5	8/1/2008
August 2008	Fecal Coliform	30D Conc	1000	6000.	8/1/2008
August 2008	Dissolved Oxygen	1D Conc	6.0	5.	8/4/2008
August 2008	Dissolved Oxygen	1D Conc	6.0	5.	8/11/2008
August 2008	Total Suspended Solids	7D Conc	18.0	21.5	8/15/2008
August 2008	Fecal Coliform	7D Conc	2000	6000.	8/15/2008
August 2008	Dissolved Oxygen	1D Conc	6.0	5.	8/25/2008
September 2008	Fecal Coliform	30D Conc	1000	6600.	9/1/2008
September 2008	Dissolved Oxygen	1D Conc	6.0	5.	9/2/2008
September 2008	Dissolved Oxygen	1D Conc	6.0	5.	9/8/2008
September 2008	Fecal Coliform	7D Conc	2000	6600.	9/15/2008
October 2008	Fecal Coliform	30D Conc	1000	5600.	10/1/2008
November 2008	Total Suspended Solids	30D Conc	12.0	18.5	11/1/2008
November 2008	Total Suspended Solids	30D Qty	0.44	.77025	11/1/2008
November 2008	Total Suspended Solids	7D Conc	18.0	18.5	11/22/2008
November 2008	Total Suspended Solids	7D Qty	0.67	.77025	11/22/2008
December 2008	Total Suspended Solids	30D Conc	12.0	21.5	12/1/2008
December 2008	Total Suspended Solids	30D Qty	0.44	.65102	12/1/2008
December 2008	Total Suspended Solids	7D Conc	18.0	21.5	12/22/2008
January 2009	Total Suspended Solids	30D Conc	12.0	16.5	1/1/2009
February 2009	Total Suspended Solids	30D Conc	12.0	17.5	2/1/2009
March 2009	Total Suspended Solids	30D Conc	12.0	28.5	3/1/2009
March 2009	Total Suspended Solids	30D Qty	0.44	184.677	3/1/2009
March 2009	CBOD 5 day	30D Qty	0.37	44.4522	3/1/2009
March 2009	Total Suspended Solids	7D Conc	18.0	28.5	3/22/2009
March 2009	Total Suspended Solids	7D Qty	0.67	184.677	3/22/2009
March 2009	CBOD 5 day	7D Qty	0.55	44.4522	3/22/2009
April 2009	Total Suspended Solids	30D Conc	12.0	18.3	4/1/2009
April 2009	Total Suspended Solids	30D Qty	0.44	97.9414	4/1/2009
April 2009	CBOD 5 day	30D Qty	0.37	13.4334	4/1/2009
May 2009	Fecal Coliform	30D Conc	1000	2455.	5/1/2009
May 2009	Fecal Coliform	7D Conc	2000	2455.	5/22/2009
May 2009	Chlorine, Total Residu	1D Conc	0.019	.1	5/26/2009

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2009	Chlorine, Total Residu	1D Conc	0.019	.5	5/28/2009
May 2009	Dissolved Oxygen	1D Conc	6.0	5.8	5/28/2009
June 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.07	.45432	6/1/2009
June 2009	Fecal Coliform	30D Conc	1000	2818.	6/1/2009
June 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.11	.45432	6/22/2009
June 2009	Fecal Coliform	7D Conc	2000	2818.	6/22/2009
July 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.07	.34703	7/1/2009
July 2009	Chlorine, Total Residu	1D Conc	0.019	.05	7/6/2009
July 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.11	.34703	7/22/2009
August 2009	Total Suspended Solids	30D Qty	0.44	30.0907	8/1/2009
August 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.07	.68206	8/1/2009
August 2009	Fecal Coliform	30D Conc	1000	4545.	8/1/2009
August 2009	Total Suspended Solids	7D Qty	0.67	30.0907	8/22/2009
August 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.11	.68206	8/22/2009
August 2009	Fecal Coliform	7D Conc	2000	4545.	8/22/2009
September 2009	Fecal Coliform	30D Conc	1000	90000.	9/1/2009
September 2009	Chlorine, Total Residu	1D Conc	0.019	.214	9/8/2009
September 2009	Chlorine, Total Residu	1D Conc	0.019	.203	9/21/2009
September 2009	Dissolved Oxygen	1D Conc	6.0	5.	9/21/2009
September 2009	Fecal Coliform	7D Conc	2000	90000.	9/22/2009
September 2009	Chlorine, Total Residu	1D Conc	0.019	.3	9/22/2009
October 2009	Chlorine, Total Residu	1D Conc	0.019	.195	10/5/2009
October 2009	Chlorine, Total Residu	1D Conc	0.019	.201	10/19/2009
October 2009	Chlorine, Total Residu	1D Conc	0.019	.18	10/22/2009

Be advised that the Stateline MHP is in Significant Noncompliance (SNC) with the NPDES Permit. This office will initiate enforcement against the mobile home park in the event the plant upgrade is not immediately undertaken. You must immediately arrange for the manufacture and delivery of the necessary equipment included in the approved upgrade. You also must keep this office informed of your activities for upgrading the plant. The plant upgrades must be initiated no later than March 31, 2010. Failure to do so will result in enforcement action against the facility.

Operator of Record

The wastewater treatment plant for the Stateline MHP is identified as a Class I plant in the NPDES Permit. This requires that an Operator of Record with at least a Class I license be responsible for operations of the plant.

In the previous inspection report dated July 8, 2008; this writer requested that you provide a written response to this office indicating the name and telephone number of the licensed operator currently responsible for the treatment system. It was also requested that you provide to this office, a signed contract for services the operator is responsible to perform and the frequency of those services. The requested information was to be submitted to this office no

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later than September 15, 2008. However, the information was never received. **The information regarding the operator of record must be immediately submitted to this office.**

#### Electronic Discharge Monitoring Reports

A review of Agency records indicates that electronic Discharge Monitoring Reports (DMRs) are being submitted and **certified** by your contract laboratory. While eDMR allows permitted facilities to enter and submit DMR data, federal and state regulations specify who can legally sign and certify the reports. Pursuant to the regulations, DMRs can **only** be signed and certified by a facility's responsible official, i.e. owner, principal executive officer, or ranking elected official, or by a duly authorized representative of said official. Pursuant to Title 40 Code of Federal Regulations (40 CFR) 122.22 (b), 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.

The Personal Identification Number, or PIN, assigned by Ohio EPA uniquely identifies and serves as the **electronic signature** of the responsible or duly-authorized official.

Under the eDMR program, the PIN holder can delegate individuals, such as lab personnel, with the privilege to view, create and edit DMRs, but not submit eDMR data. These individuals must have an eBusiness Center account, but do not need a PIN. Since they do not have the privilege of actually certifying the data, the law does not require them to have a PIN. Once these users perform the data entry or review the data, the DMR is saved and the PIN holder can log on and submit the DMR.

#### Conclusion

This office is trying to work with you to address all concerns regarding the treatment plant and the legal requirements for operations and reporting in lieu of initiating enforcement action. However, it appears that you have not responded in good faith to these concerns and requirements. It is recommended that you respond to this inspection report by taking the following actions.

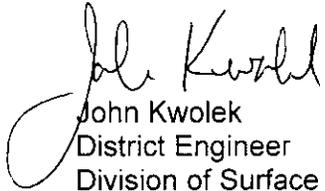
- 1) You must immediately order the equipment necessary to upgrade the treatment system as approved by this office in 2009.
- 2) You must begin construction of the plant upgrade no later than March 31, 2010.

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- 3) You must immediately provide the information regarding the operator of record requested above including the contract you have with the operator. In the event a contract with the operator has not been established, you will have until March 31, 2010 to provide that information. However, you must immediately provide a written response to this office including the name of the licensed operator responsible for the treatment plant.
- 4) You must immediately apply for and receive a Personal Identification Number (PIN) that provides you, the owner of the facility, the authority to submit the electronic Discharge Monitoring Reports. You can authorize the operator of record to submit the reports; however, that person must be formally authorized in accordance with the above procedures. Additional information regarding the electronic Discharge Monitoring Reports can be found at the following Web address: <http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>.

You may contact this office at (330) 963-1251 to discuss any questions you may have regarding this inspection report. You may also contact this writer at the following e-mail address: [john.kwolek@epa.state.oh.us](mailto:john.kwolek@epa.state.oh.us).

Respectfully,

  
John Kwolek  
District Engineer  
Division of Surface Water

JK/mt

cc: Joe Mansky, Mahoning County Department of Health  
John Hallas, Mahoning County Department of Health

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

