

**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korieski, Director

September 20, 2010

RE: MAHONING COUNTY  
COITSVILLE TWP  
STATELINE MHP  
NPDES PERMIT NO. 3PV00088  
2011 CEI AND NOTICE OF VIOLATION

**CERTIFIED MAIL**

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

Dear Mr. Holley:

On September 16, 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 medium 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 no adequate 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 unsatisfactory.
- 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.
- 5) The new equalization tank had not been installed at the time of the inspection. The equalization tank must be installed as approved. The tank is intended 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

The compliance record for the Stateline MHP was reviewed as part of this inspection. The period of review was December 2009 through August 2010. Following is a list of limit violations identified during the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2010	Total Suspended Solids	30D Qty	0.44	43.1717	1/1/2010
January 2010	Total Suspended Solids	7D Qty	0.67	43.1717	1/22/2010
February 2010	Total Suspended Solids	30D Conc	12.0	15.	2/1/2010
February 2010	Total Suspended Solids	30D Qty	0.44	.4542	2/1/2010
March 2010	Total Suspended Solids	30D Conc	12.0	25.5	3/1/2010
March 2010	Total Suspended Solids	30D Qty	0.44	.96518	3/1/2010
March 2010	Total Suspended Solids	7D Conc	18.0	25.5	3/15/2010
March 2010	Total Suspended Solids	7D Qty	0.67	.96518	3/15/2010
May 2010	Fecal Coliform	30D Conc	1000	27000.	5/1/2010
May 2010	Chlorine, Total Residu	1D Conc	0.019	.07	5/3/2010
May 2010	Dissolved Oxygen	1D Conc	6.0	5.	5/3/2010
May 2010	Fecal Coliform	7D Conc	2000	27000.	5/8/2010
May 2010	Chlorine, Total Residu	1D Conc	0.019	.1	5/11/2010
May 2010	Chlorine, Total Residu	1D Conc	0.019	.09	5/17/2010
June 2010	Fecal Coliform	30D Conc	1000	55000.	6/1/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.08	6/1/2010
June 2010	Fecal Coliform	7D Conc	2000	55000.	6/8/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.07	6/8/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.08	6/14/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.08	6/21/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.07	6/28/2010
July 2010	Total Suspended Solids	30D Conc	12.0	12.5	7/1/2010
July 2010	Fecal Coliform	30D Conc	1000	14000.	7/1/2010
July 2010	CBOD 5 day	30D Conc	10	10.2	7/1/2010
July 2010	Chlorine, Total Residu	1D Conc	0.019	.08	7/4/2010
July 2010	Fecal Coliform	7D Conc	2000	14000.	7/8/2010
July 2010	Chlorine, Total Residu	1D Conc	0.019	.05	7/12/2010

Be advised that the Stateline MHP continues in Significant Noncompliance with the NPDES Permit. Violations of the NPDES Permit constitute violations of Ohio Revised Code (R.C.) 6111.07

## 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 reports dated July 8, 2008 and January 14, 2010, 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 later than September 15, 2008. However, the information was never received.

#### Electronic Discharge Monitoring Reports

As discussed in the previous inspection report dated January 14, 2010, 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.

#### **NPDES Permit:**

The NPDES Permit is due to expire on October 31, 2010. The NPDES Permit requires the Stateline Mobile Home Park to submit a renewal application not later than 180 days prior to the expiration date. A renewal application should have been submitted no later than May 1, 2010. Failure to submit the permit renewal application places the Stateline

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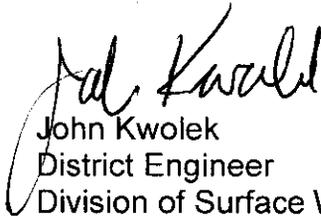
Mobile Home Park in violation of page 1, paragraph 4 of the permit. The renewal application must be submitted no later than October 1, 2010

### Conclusion

It is understood that you have filed for bankruptcy. This office requests that you provide a response to this letter explaining your plans for the Stateline MHP. Please explain if you plan to maintain ownership of the park or if you plan to sell the park to a new owner. If the park is to be sold, the potential owner(s) must be made aware of the liabilities associated with the wastewater treatment system.

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

Respectfully,



John Kwolek  
District Engineer  
Division of Surface Water

JK:bo

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

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

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9/20/10

Sent To Ron Volley  
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