



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

February 25, 2011

RE: TRUMBULL COUNTY  
BROOKFIELD TOWNSHIP  
WYNGATE MANOR MHP  
NPDES PERMIT NO. OH0044857  
OHIO EPA PERMIT NO. 3PV00019

Mr. Tim Matthews, President  
Superior Mobile Home Sales, Inc.  
535 West Third Street  
Dover, OH 44622

Dear Mr. Matthews:

On February 16, 2011, Mr. Richard Curl of the Trumbull County Health Department, Mr. Dean Stoll of the Ohio EPA, and the undersigned conducted an inspection of the wastewater treatment plant located at the above referenced address. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the NPDES permit.

The wet-stream treatment components consist of a trash trap, flow equalization basin, 30,000 gpd extended aeration activated sludge treatment process, final settling tank, tertiary slow surface sand filtration, and chlorination. Sludge handling consists of an aerated sludge holding tank. Final effluent discharge is to a tributary of Yankee Creek.

At the time of the inspection, the following observations were noted:

- Effluent quality was not visually confirmed due to snowfall and ice on the ground.
- One of the backup blowers for the aeration tanks was inoperative. This unit needs to be repaired and available for use.
- The clarifiers had a large amount of accumulated debris and floatable solids. The debris needs to be cleaned out and the solids skimmed.
- The overflow pipes in the sand filter beds are not permitted, and must be removed.
- The sand filter beds had a large amount of accumulated debris and vegetation. The vegetation needs to be pulled, the debris removed, and the sand raked.
- The sand filter wall joints are separating substantially, and could end up leaking. The separation between the joints needs to be repaired.
- Several of the grates over the tanks were quite rusty. These should be replaced.

- A black liquid was observed accumulating in a well next to the equalization tank located on the south side of the plant. This black liquid was being discharged directly through a PVC pipe into the creek on the east side of the plant. Ohio EPA understands that this well is only meant to be pumping and discharging ground water to prevent a flotation failure of the equalization tank. Please submit documentation to this office describing exactly why the fluid being discharged is black, and what measures will be implemented to remedy this.
- It was noted that the facility had not yet installed the UV disinfection system authorized pursuant to PTI No. 726427, issued on October 29, 2009. Please be aware that permits to install expire eighteen months after the date of issuance if construction is not initiated beforehand. A new PTI, along with the appropriate fees, is required to be submitted in the event that a previously issued PTI expires. Please be advised that a properly designed disinfection system must be installed prior to the May 2011 disinfection.
- Detailed records of all plant visits and any work done at the plant must be maintained on site and recorded in a bound and numbered book. Loose sheets are not acceptable as the sole means of recording site visits.
- The high level overflow on the equalization tank needs to be redirected such that it flows through the plant flow meter.

A review of the facility's Discharge Monitoring Reports received by Ohio EPA for the period October 2008 – February 2011 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of non-compliance are as follows:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2008	001	00530	Total Suspended Solids	1D Qty	2.54	3.08099	12/22/2008
January 2009	001	00530	Total Suspended Solids	1D Qty	2.54	2.90688	1/5/2009
February 2009	001	00530	Total Suspended Solids	1D Qty	2.54	3.31566	2/10/2009
February 2009	001	00530	Total Suspended Solids	1D Qty	2.54	4.36032	2/24/2009
May 2009	001	00530	Total Suspended Solids	30D Conc	12	12.75	5/1/2009
May 2009	001	00530	Total Suspended Solids	1D Conc	18	31.	5/19/2009
May 2009	001	00530	Total Suspended Solids	1D Qty	2.54	7.86145	5/19/2009
May 2009	001	00300	Dissolved Oxygen	1D Conc	5.0	3.4	5/19/2009
May 2009	001	80082	CBOD 5 day	1D Qty	3.2	3.80393	5/19/2009
April 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.7	4/13/2010
May 2010	001	00530	Total Suspended Solids	1D Qty	2.54	3.7093	5/18/2010
December 2010	001	00530	Total Suspended Solids	1D Qty	2.54	4.01967	12/9/2010
January 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.7	1/18/2011

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Based on the above information and the inspection findings, Wyngate Manor is considered to be in **significant non-compliance** with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

We understand that Mr. Brian Mosko and Mr. Ed Mosko, of Valley Environmental Labs, Inc., have been routinely submitting the DMRs electronically via an assigned Personal Identification Number (PIN). Pursuant to Part III of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22". 40 CFR 122.22 (a) states that reports for a corporation can only be signed and certified by an individual with decision making privileges, or by a duly authorized representative of said individual. Pursuant to 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.*

Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of a written contract between Wyngate Manor MHP and a state-certified operator. A copy of the contract must be submitted to Ohio EPA. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the services (i.e. inspection, monitoring, and supervision) necessary to maintain the reliable operation of the wastewater works. As the permit holder, it is the owner's responsibility to perform all daily operation and maintenance obligations not otherwise delegated to the certified operator.

This office received an NPDES permit renewal application on December 9, 2010. NPDES permit renewal applications must be complete before they can be processed, and continued coverage to discharge re-issued under a new permit. To date, this application is considered incomplete because there are no current records on file designating a certified operator of the plant.

In accordance with OAC 3745-7, the facility must provide written notice regarding the name and certification of the designated certified operator(s) of record for the facility. Please complete the enclosed Operator of Record (ORC) Notification Form and return it to the

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specified address within 30 days of receipt of this letter. Failure to submit the required documentation as described above will lead to the expiration of the current NPDES permit. Once a permit expires, the facility will be prohibited to continue discharging treated sewage to waters of the state. Continued discharge of treated sewage to waters of the state without the coverage of an NPDES permit is a direct violation of OAC 3745, and would subject the facility to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code

Please inform this office, in writing, within 10 days of receipt of this notification as to the reasons for the above violations and/or deficiencies, and actions that will be undertaken to remedy them. Please be advised that past or current acts of non-compliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Tomás Parry  
Environmental Engineer  
Division of Surface Water

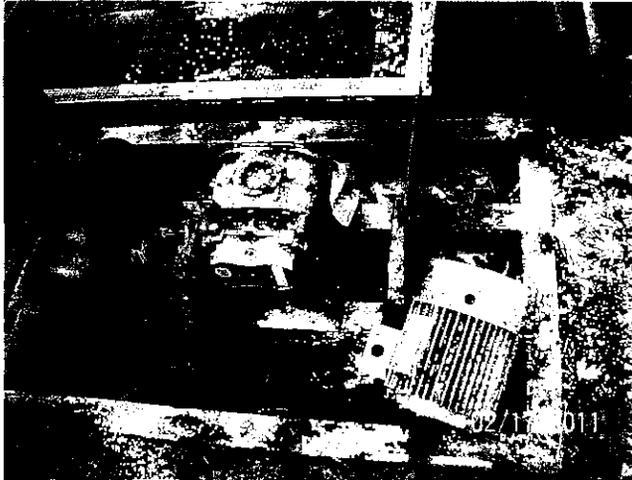
TP/mt

Attachment: photos

enclosure: Operator of Record Notification Form

cc: Richard Curl, Trumbull County Health Department  
Ed and Brian Mosko, Valley Environmental Lab, Inc.

ec: Dean Stoll, Ohio EPA NEDO



inoperative blower motor



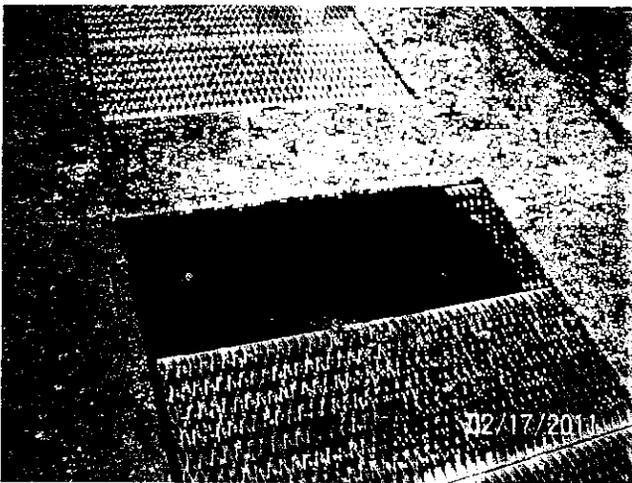
inoperative blower



heavy floatable solids accumulation



debris and solids in weir trough



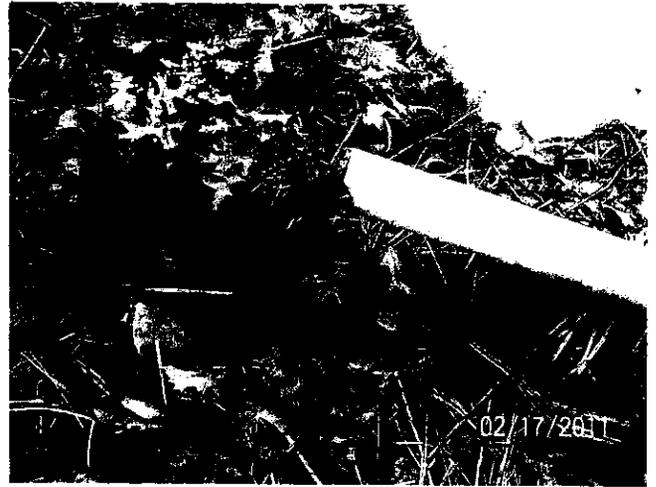
rusty grating



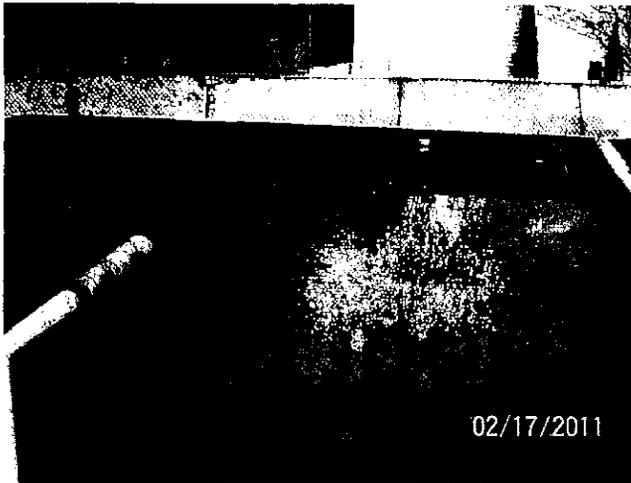
pumping well



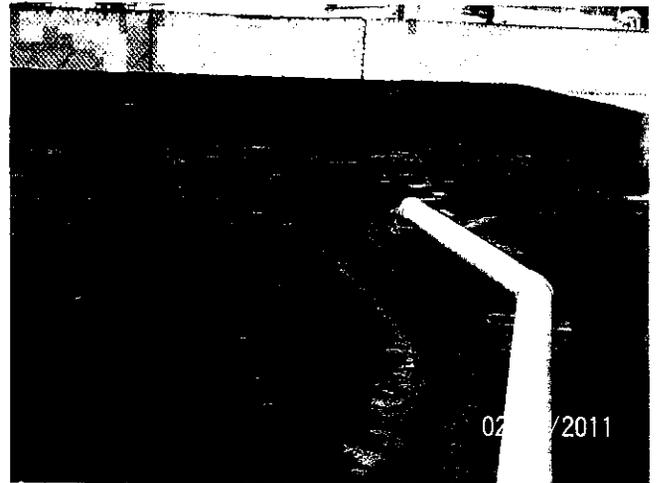
pumping well discharge pipe to creek



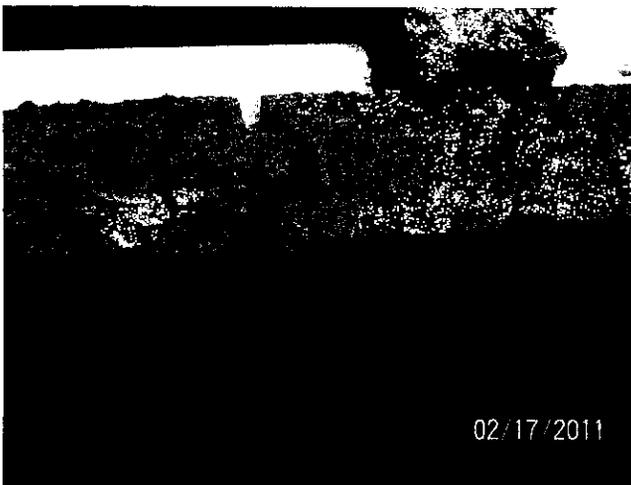
black liquid discharge at creek



vegetation in sand filters



accumulated debris in sand filters



separated sand filter wall joint



visible, illegal overflow pipes in sand filters