



Environmental
Protection Agency

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

February 8, 2011

RE: TRUMBULL COUNTY
BROOKFIELD TOWNSHIP
RONCO RENTALS APARTMENTS
NPDES PERMIT NO. OH0128481
OHIO EPA PERMIT NO. 3PW00026

Mr. Ron Germadnik
6747 Warren Sharon Road
Brookfield, OH 44403

Dear Mr. Germadnik:

On January 6, 2011, Mr. Erm Gomes of Ohio EPA, Mr. Richard Curl of the Trumbull County Health Department, and the undersigned conducted an inspection of the wastewater treatment plant serving the above referenced apartment complex. 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 current 1,000 gallon/day treatment system consists of two 1,000 gallon septic tanks, 1,000 gallon recirculation/blend tank, 225 sq. ft. recirculating sand filter (RSF), and 405 gallon chlorination/dechlorination tank. At the time of the inspection, the following observations and comments were noted and discussed with you:

1. All treatment units appeared to be in operation. The final effluent being discharged appeared to be of satisfactory visual quality.
2. "Wet" spots were noted on the surface of the RSF. The cause(s) of this condition must be investigated and appropriate corrective actions implemented.
3. When the recirculation/blend tank pumps were cycled, no noticeable drop in water level was observed in the tank. Additionally, no noticeable increase in flow to the chlorination/dechlorination system was observed during the pump cycles. The cause(s) of this condition must be investigated and appropriate corrective actions implemented.
4. A site observation revealed possible issues with freezing in the piping feeding the RSF. Mulching and landscaping over the RSF was discussed as a possible alternative to insulate the RSF, and prevent this problem.
5. The tank lids should be secured, e.g. locked or bolted, to prevent unauthorized or accidental access to the tanks.

6. Pursuant to recordkeeping requirements contained in Ohio Administrative Code (OAC) 3745-7-09, specific operation and maintenance records of the sewage system must be kept on file at the facility.

A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period April 2008 through February 2011 indicates violations of the effluent limitations and/or monitoring requirements contained in the NPDES permit. The specific instances of noncompliance are as follows:

| Reporting Period | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|------------------|---------|----------------|------------------------|------------|-------|----------------|----------------|
| December 2008 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 4.5 | 4.68 | 12/1/2008 |
| December 2008 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.5 | 12/2/2008 |
| June 2008 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 2.4 | 6/10/2008 |
| December 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 4.5 | 4.93 | 12/1/2010 |
| March 2009 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 1D Conc | 6.75 | 17.2 | 3/2/2009 |
| March 2009 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 4.5 | 17.2 | 3/1/2009 |
| March 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.1 | 3/2/2009 |
| August 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 1D Conc | 3.0 | 4.91 | 8/4/2010 |
| August 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 2.0 | 4.91 | 8/1/2010 |
| August 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 1.8 | 8/4/2010 |
| March 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 1D Conc | 6.75 | 19.1 | 3/9/2010 |
| March 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 4.5 | 19.1 | 3/1/2010 |
| August 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.6 | 8/4/2009 |
| June 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 1D Conc | 3.0 | 13.9 | 6/24/2010 |
| June 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 2.0 | 13.9 | 6/1/2010 |
| June 2010 | 001 | 31616 | Fecal Coliform | 1D Conc | 2000 | 10000 | 6/24/2010 |
| June 2010 | 001 | 31616 | Fecal Coliform | 30D Conc | 1000 | 10000 | 6/1/2010 |
| June 2010 | 001 | 80082 | CBOD 5 day | 30D Conc | 10 | 11 | 6/1/2010 |
| June 2009 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 1D Conc | 3.0 | 3.14 | 6/2/2009 |
| June 2009 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 2.0 | 3.14 | 6/1/2009 |
| June 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4 | 6/2/2009 |

| Reporting Period | Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported | Violation Date |
|------------------|---------|----------------|---------------------|------------------|----------|----------|----------------|
| January 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 01/01/2009 |
| January 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 01/01/2009 |
| January 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 01/01/2009 |
| January 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 01/08/2009 |
| January 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 01/08/2009 |
| January 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 01/08/2009 |
| January 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 01/15/2009 |

| Reporting Period | Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported | Violation Date |
|------------------|---------|----------------|---------------------|------------------|----------|----------|----------------|
| January 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 01/15/2009 |
| January 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 01/15/2009 |
| January 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 01/22/2009 |
| January 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 01/22/2009 |
| January 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 01/22/2009 |
| May 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 05/01/2009 |
| May 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 05/01/2009 |
| May 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 05/01/2009 |
| May 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 05/08/2009 |
| May 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 05/08/2009 |
| May 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 05/08/2009 |
| May 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 05/15/2009 |
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| May 2009 | 001 | 00083 | Color, Severity | 1/Week | 1 | 0 | 05/22/2009 |
| May 2009 | 001 | 01330 | Odor, Severity | 1/Week | 1 | 0 | 05/22/2009 |
| May 2009 | 001 | 01350 | Turbidity, Severity | 1/Week | 1 | 0 | 05/22/2009 |

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 sole proprietorship can only be signed and certified by the proprietor 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.***

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Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of a written contract between Mr. Germadnik 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.

Please be advised that failure to comply with the terms and conditions of the NPDES permit may be 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. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violations and/or deficiencies. Your response should include specific dates for completion of the actions.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer II
Division of Surface Water

TP/mt

cc: Richard Curl, Trumbull County Health Department
Brian Mosko, Valley Environmental Labs, Inc.