

**Environmental
Protection Agency**

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

April 27, 2011

RE: TRUMBULL COUNTY
BAZETTA TOWNSHIP
LAKEVIEW MOBILE HOME PARK
NPDES PERMIT NO. OH0044881
OHIO EPA PERMIT NO. 3PV00020

Mr. Jay Plymale, Owner
Lakeview Mobile Home Park
7437 Birkner Drive
Kent, Ohio 44417

Dear Mr. Plymale:

On March 31, 2011, an inspection of the above referenced wastewater treatment plant was conducted by Mr. Richard Curl of the Trumbull County Health Department and the undersigned. The inspection was performed to evaluate the operational performance of the treatment system and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit

The current 50,000 gallon/day treatment system consists of an extended aeration activated sludge package plant, final settling tank, up-flow clarifier, slow surface sand filter, sludge holding tank, and disinfection.

At the time of the inspection, the general operation and maintenance of the treatment plant was poor. The following observations and/or deficiencies were noted:

1. The walls separating the sludge holding tanks from the aeration tanks are badly corroding (i.e. north tank). The walls shall either be properly repaired, or plans must be developed and submitted to this office for the installation of a separate sludge holding tank.
2. The railing and grating system throughout the plant is quite corroded, and poses a real health risk to anyone utilizing it. Rusted gratings and railings need to be replaced.
3. Black plastic sheeting is not an acceptable means of sand filter weed control, and needs to be removed. Permeable cloth landscaping fabrics are an acceptable alternative.
4. There was no visit/maintenance log book on site. Bound and numbered log books should be kept on site as a means to record all site visits by maintenance and operating personnel. Any and all work or maintenance done at the plant should be recorded in these log books, along with the times of arrival and departure. Please note that loose sheets of paper are not acceptable as the sole means of recording site visits.
5. The existing sand in the filters does not appear to meet Ohio EPA regulations for particle size. Sand must have an effective size of .4 – 1.0 mm, and a uniformity coefficient not greater than 3.0. Additionally, excessive amounts of sludge/solids buildup and

vegetation were observed in the sand filters. The filters need to be completely cleaned and thoroughly raked. Once the filters have been cleaned and raked, please verify the existing depth of sand, which should be 18". If there is not 18" of sand, new sand meeting Ohio EPA size requirements will need to be added until the proper depth is obtained.

6. The circuit box located in the treatment plant's equipment building has a large bird nest inside. This poses a real fire hazard, and should be removed immediately.
7. Threaded U-bolts are not an acceptable means of securing lock bars on in-ground tanks (see photos).
8. There were several leaky spots in the sand filter walls. These need to be repaired.
9. The sand filter distribution box needs to be cleaned and weeded.
10. The overflow openings located in the sand filter walls are strictly prohibited, and need to be permanently capped.

A review of the facility's monthly Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period November 2008 – March 2011 indicates the following violations of the effluent limitations contained in the NPDES permit:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	5.91	5/18/2010
May 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.04	5/1/2010
May 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.57	1.27505	5/18/2010
May 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.38	.64171	5/1/2010
May 2010	001	80082	CBOD 5 day	1D Conc	15	17.	5/18/2010
May 2010	001	80082	CBOD 5 day	1D Qty	2.8	3.66767	5/18/2010
May 2010	001	00300	Dissolved Oxygen	1D Conc	6.0	3.1	5/25/2010
October 2009	001	00400	pH	1D Conc	9.0	9.1	10/13/2009
October 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.7	10/7/2009
June 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	10.3	6/1/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	12.4	6/15/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	11.35	6/1/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.57	1.63739	6/1/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.57	.70401	6/15/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.38	1.1707	6/1/2010
June 2010	001	00300	Dissolved Oxygen	1D Conc	6.0	4.	6/1/2010
June 2010	001	00300	Dissolved Oxygen	1D Conc	6.0	3.6	6/8/2010
June 2010	001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	6/15/2010
August 2009	001	31616	Fecal Coliform	1D Conc	2000	12000.	8/4/2009
August 2009	001	31616	Fecal Coliform	30D Conc	1000	12000.	8/1/2009

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2010	001	00530	Total Suspended Solids	1D Conc	18	59	9/2/2010
September 2010	001	00530	Total Suspended Solids	30D Conc	12	15.75	9/1/2010
September 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	9.79	9/16/2010
September 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	4.955	9/1/2010
September 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.57	.88932	9/16/2010
September 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.38	.44784	9/1/2010
April 2010	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	4/6/2010
September 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	9/15/2009
September 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	9/22/2009

Please note that upon renewal of the facility's NPDES permit, there will be a number of monitoring changes made. Because of this, Ohio EPA advises that the permittee read through the new permit carefully once it is issued. The new permit will be phasing out fecal coliform monitoring limits, and replacing it with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. The permittee will also be required to begin monitoring right away for Total Kjeldahl Nitrogen (TKN), Nitrite and Nitrate, and Phosphorus. Monitoring requirements for all new parameters will be described in the new permit.

We understand that Mr. Brian 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 Lakeview 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.

Mr. Jay Plymale
Lakeview Mobile Home Park
April 27, 2011
Page 4

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.

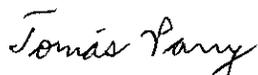
Ohio Administrative Code (OAC) 3745-7 requires that you have an up-to-date contract with your certified operator. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the onsite services (i.e. **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. If applicable, the signatory authority required pursuant to 40 CFR 122.22 (b) must be addressed under the terms of the contract for submission of DMRs. Please provide to this office a copy of the contract between Valley MHP and its certified plant operator.

Ohio EPA has no records on file that identify a certified operator for this plant. Please complete and submit the enclosed Operator of Record Notification form so that this requirement is met. Please note that submission of the ORC form will be a new requirement in the renewal permit.

Please be advised that failure to comply with the terms and conditions of your 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 referenced violations and/or deficiencies. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/mt

Attachments: ORC Form
photos

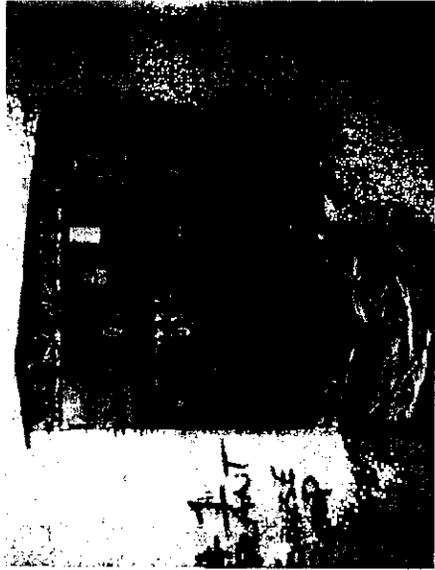
cc: Valley Environmental Lab, Inc.
Richard Curli, R.S., Trumbull County Health Department



severely corroded tank walls



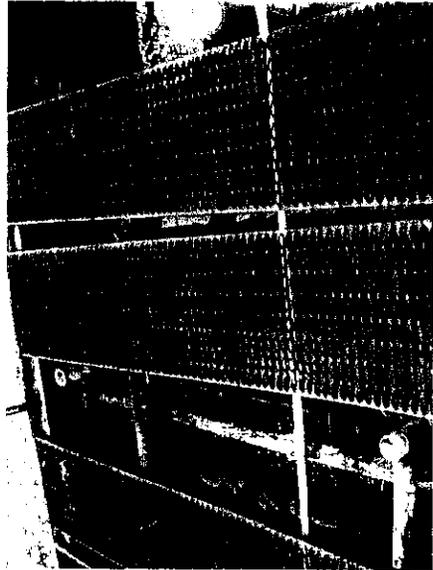
scum buildup



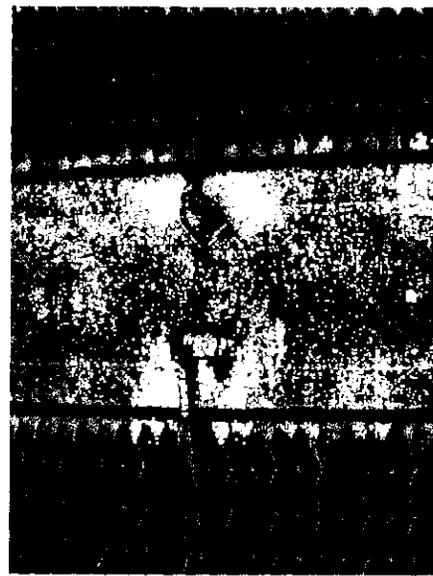
bird nest in fuse box



plastic sheeting in sand filter



rusted grating



threaded U-bolts



heavy sludge accumulation in sand filter



leaky sand filter walls



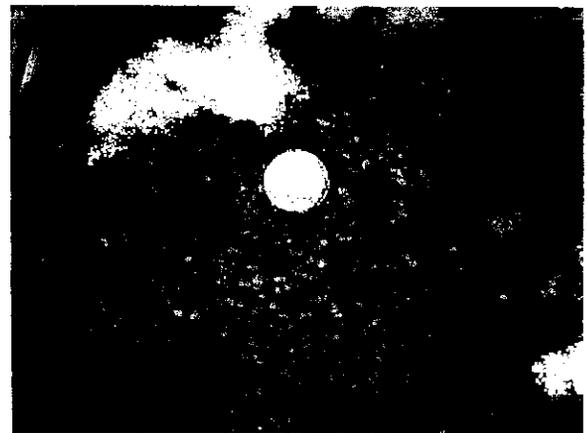
overflow holes in sand filter walls



excessive vegetation in distribution box



excessive floating solids in flooded sand filter



sand grain size with quarter for perspective



Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit

Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____
 PWS ID/NPDES Permit #: _____ STU # _____ Classification: _____

 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	