



State of Ohio Environmental Protection Agency

Northeast District Office

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

April 16, 2008

RE: TRUMBULL COUNTY  
SOUTHINGTON TOWNSHIP  
SOUTHINGTON ESTATES LLC  
NPDES PERMIT NO. OH0107514  
OHIO EPA PERMIT NO. 3PV00066

Ms. Myrna Apel-Brueggeman  
657 Longmere Drive  
Kent, OH 44240

Dear Ms. Brueggeman:

On April 10, 2008, an inspection was conducted of the Southington Estates LLC mobile home park's wastewater treatment plant by the undersigned. The facility was represented by Messrs. Earl Brueggeman, Raleigh Basinger, and Charles Yannucci. 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 flow equalization basin, extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, and UV disinfection. Sludge handling consists of an aerated sludge holding tank and sludge drying beds.

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

1. The treatment plant appeared to be experiencing a problem with excessive foaming. It was suspected that the problem may be associated with a "young" sludge. Although fluffy and light in appearance, the sludge settled appreciably well (approx. 50%) during a 30-minute settleability test. The final effluent at Outfall 001 was clear with no observable impact to the receiving stream.
2. Mr. Basinger was in the process of cleaning sludge deposits that had accumulated on the surface sand filters over the winter months. It was noted that the facility planned to install a geotextile fabric over the sand filters to facilitate cleaning, as well as for preventative weed control.
3. The facility had initiated smoke testing in areas of the collection system suspected of contributing excessive infiltration/inflow (I/I) to the treatment plant.

A review of the facility's Discharge Monitoring Reports (DMRs), formerly known as Monthly Operating Reports (MORs), received by Ohio EPA for the period January 2007 through March 2008 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance are as follows:

SOUTHINGTON ESTATES MHP			4/2007 - 3/2008			
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2007	001	CBOD 5 day	1D Conc	15	23.	4/17/2007
August 2007	001	CBOD 5 day	1D Conc	15	21.	8/27/2007

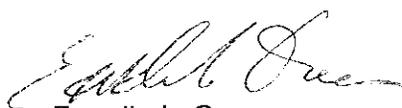
SOUTHINGTON ESTATES MHP			4/2007 – 3/2008			
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2008	001	CBOD 5 day	1D Conc	15	27.	2/4/2008
February 2008	001	CBOD 5 day	1D Conc	15	27.	2/28/2008
February 2008	001	CBOD 5 day	1D Qty	1.704	2.0439	2/4/2008
February 2008	001	CBOD 5 day	30D Conc	10	15.8166	2/1/2008
March 2007	001	CBOD 5 day	7D Conc	15	21.	3/22/2007
May 2007	001	Nitrogen, Ammonia (NH3)	1D Conc	2.25	4.24	5/1/2007
October 2007	001	Nitrogen, Ammonia (NH3)	1D Conc	2.25	2.28	10/1/2007
October 2007	001	Nitrogen, Ammonia (NH3)	1D Conc	2.25	2.46	10/19/2007
May 2007	001	Nitrogen, Ammonia (NH3)	1D Qty	0.26	.36911	5/1/2007
January 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	6.0	6.26	1/15/2007
April 2007	001	Total Suspended Solids	1D Conc	18	34.	4/10/2007
September 2007	001	Total Suspended Solids	1D Conc	18	21.	9/17/2007

Please be advised that the above violations are 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 while the facility contracts with Mr. Yannucci for operations supervision, Valley Environmental Lab has been routinely submitting the eDMRs. Pursuant to Part III, Item 28 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 partnerships can only be signed and certified by a general partner or by a duly authorized representative of said individual. Ohio EPA is currently engaged in a process to revise the electronic data reporting process, including the assignment of Personal Identification Numbers (PINs), to comply with the requirements of the 2005 Cross-Media Electronic Reporting Regulation (CROMERR). Only the person(s) who have the privilege of submitting data, i.e. the responsible or authorized official(s), will eventually need a CROMERR-compliant PIN through Ohio EPA's eBusiness Center. A facility will also have the ability to designate individuals, e.g. Valley, that only have the privilege to view, create and edit, but not submit eDMR data. The new system is expected to be available by no later than fall 2008.

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

Respectfully,



Ermelindo Gomes  
 Environmental Engineer  
 Division of Surface Water

EG/mt