

**Environmental  
Protection Agency**

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

June 2, 2010

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, Ohio 44240

Dear Ms. Brueggeman:

On April 29, 2010, an inspection was conducted of the Southington Estates LLC mobile home park's wastewater treatment plant by the undersigned. The facility was represented by Mr. Raleigh Basinger. 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, findings, and/or comments were noted:

- The general operation and maintenance of the treatment plant appear to be satisfactory.
- The final effluent being discharged to the receiving stream appeared to be of satisfactory visual quality.

A review of the facility's Discharge Monitoring Reports (DMRs), received by Ohio EPA for the period, April 2008 – April 2010, indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2009	001	Fecal Coliform	1/Month	1	0	05/01/2009

In addition to the above, our review of the facility's data reporting procedures noted the following:

- We understand that the facility currently employs Charles Yanucci for operational oversight of the treatment system. However, our review of the facility's data reporting procedures noted that Mr. Brian Mosko, of Valley Environmental

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Laboratory, continues to submit and certify the discharge monitoring reports (DMRs) for the facility using the eDMR system. While eDMR allows permitted facilities to enter, sign, and submit DMRs on the internet, federal and state regulations specify who can legally sign and certify the reports. Pursuant to Part III of the NPDES permit, DMRs can only be signed and certified by a facility's responsible official, e.g. owner, 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.***

Based on the above requirements, Mr. Mosko cannot sign and certify the DMRs.

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.

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

File: Semipublic/Trumbull County/Southington Twp./Southington Estates