



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 28, 2008

RE: TRUMBULL COUNTY  
BRACEVILLE TOWNSHIP  
ARHAVEN ESTATES MOBILE HOME PARK  
NPDES PERMIT NO. OH0107484  
OHIO EPA PERMIT NO. 3PV00064

Mr. Anthony Casale, President  
Casan Ltd./Arhaven Estates Mobile Home Park  
211 Arhaven Drive  
Newton Falls, OH 44444

Dear Mr. Casale:

On October 14, 2008, this office conducted an Operation and Maintenance Inspection of the wastewater treatment plant serving the Arhaven Estates Mobile Home Park. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit. In attendance were representatives of Valley Environmental Labs.

The current 17,500 gallon/day treatment system, designed to serve 100 lots, consists of a flow equalization basin, extended aeration activated sludge package plant, final settling tank, slow surface sand filtration, sludge holding, and chlorination/dechlorination.

At the time of the inspection, the following observations, findings, and/or comments were noted:

1. All treatment units appeared to be in operation. It was noted that one of the EQ pumps had been removed for mechanical repair. The final effluent being discharged to the Mahoning River appeared to be of satisfactory quality.
2. The open crack in the pump station needs to be repaired.
3. The NPDES permit requires that flow rate be measured "Continuously". As such, the facility shall ensure that the flow meter is returned to an operational state.
4. The facility shall ensure that an adequate "dechlorination unit" is installed at the outlet of the Chlorine Contact Tank prior to May 2009.

A review of the facility's Discharge Monitoring Reports (EPA Form 4500) received by Ohio EPA for the period, August 2007 – September 2008, indicate violations of the final effluent limitations of the NPDES permit. The specific instances of non-compliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2008	001	Fecal Coliform	1D Conc	2000	2300.	6/5/2008
August 2008	001	Fecal Coliform	1D Conc	2000	2000.	8/5/2008

- **DMRs were not submitted for the months of August and November 2007.**

MR. ANTHONY CASALE, PRESIDENT  
CASAN LTD./ARHAVEN ESTATES MOBILE HOME PARK  
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In addition to the above, our review of the facility's data reporting procedures noted the following:

- We understand that Valley Environmental Lab is currently submitting the electronic DMRs (eDMRs) for the facility. Pursuant to Part III, Item 28 of your 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 corporations can only be signed and certified by a responsible corporate officer or by a duly authorized representative of said individual. Delegations of authority must be made in writing to the Director of Ohio EPA.

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 need a CROMERR-compliant PIN through Ohio EPA's eBusiness Center.

- Pursuant to the new recordkeeping requirements contained in Ohio Administrative Code (OAC) 3745-7-09, specific operation and maintenance records of the treatment system must now be kept on file at the facility. The complete Operator Certification rules are available online at <http://www.epa.state.oh.us/ddagw/oac.html>.

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 violation 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.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mh

File: Semipublic/Trumbull County/Braceville Twp./Arhaven MHP