



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

June 27, 2007

RE: TRUMBULL COUNTY
VIENNATOWNSHIP
MIDWAY MOBILE HOME PARK 3
NPDES PERMIT NO. OH0102865
OHIO EPA PERMIT NO. 3PV00069

Mr. Larry Norton
Midway Mobile Homes LLC
1062 State Route 193
Vienna, OH 44423

Dear Mr. Norton:

On June 18, 2007, an inspection was conducted at the above referenced facility by the undersigned. The facility was represented by Mr. Larry Stadwick of B&J Environmental, Inc. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. In addition, information gathered during the inspection will be utilized in determining the renewal status of the NPDES permit

Inspection Findings/Compliance Status

The wet-stream treatment components consist of preliminary treatment (trash trap), 20,000-gpd extended aeration activated sludge treatment process, final settling tank, tertiary sand filtration, and disinfection facilities. Sludge handling consists of an aerated sludge holding tank.

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

1. The general operation and maintenance of the treatment plant appeared to be satisfactory. The effluent being discharged at the chlorine contact chamber was visually clear.
2. The riser/overflow pipes in the surface sand filter shall be eliminated. In addition, please ensure that the sand is graded to provide uniform distribution of the wastewater.
3. Please ensure that the flowmeter is calibrated on a yearly basis by a certified technician.

A review of the monthly operating reports received by Ohio EPA for the period January 2006 through May 2007 indicates violations of the effluent limitations contained in the NPDES permit. The specific instances of noncompliance are as follows:

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Effluent Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	13	25.7	3/8/2007
March 2007	001	Nitrogen, Ammonia (NH3)	7D Qty	0.98	1.16729	3/8/2007
March 2007	001	Nitrogen, Ammonia (NH3)	30D Conc	8.7	12.88	3/1/2007

Monitoring/Reporting Violations

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
March 2006	3/1/2006	001	Color, Severity	1/Day	1	0
March 2006	3/3/2006	001	Color, Severity	1/Day	1	0
March 2006	3/4/2006	001	Color, Severity	1/Day	1	0
March 2006	3/5/2006	001	Color, Severity	1/Day	1	0
March 2006	3/6/2006	001	Color, Severity	1/Day	1	0
March 2006	3/7/2006	001	Color, Severity	1/Day	1	0
March 2006	3/8/2006	001	Color, Severity	1/Day	1	0
March 2006	3/10/2006	001	Color, Severity	1/Day	1	0
March 2006	3/11/2006	001	Color, Severity	1/Day	1	0
March 2006	3/12/2006	001	Color, Severity	1/Day	1	0
March 2006	3/13/2006	001	Color, Severity	1/Day	1	0
March 2006	3/14/2006	001	Color, Severity	1/Day	1	0
March 2006	3/15/2006	001	Color, Severity	1/Day	1	0
March 2006	3/17/2006	001	Color, Severity	1/Day	1	0
March 2006	3/18/2006	001	Color, Severity	1/Day	1	0
March 2006	3/19/2006	001	Color, Severity	1/Day	1	0
March 2006	3/20/2006	001	Color, Severity	1/Day	1	0
March 2006	3/21/2006	001	Color, Severity	1/Day	1	0
March 2006	3/22/2006	001	Color, Severity	1/Day	1	0
March 2006	3/24/2006	001	Color, Severity	1/Day	1	0
March 2006	3/25/2006	001	Color, Severity	1/Day	1	0
March 2006	3/26/2006	001	Color, Severity	1/Day	1	0
March 2006	3/27/2006	001	Color, Severity	1/Day	1	0
March 2006	3/28/2006	001	Color, Severity	1/Day	1	0
March 2006	3/29/2006	001	Color, Severity	1/Day	1	0
March 2006	3/30/2006	001	Color, Severity	1/Day	1	0
March 2006	3/31/2006	001	Color, Severity	1/Day	1	0
March 2006	3/1/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/3/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/4/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/5/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/6/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/7/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/8/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/10/2006	001	Odor, Severity	1/Day	1	0

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March 2006	3/11/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/12/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/13/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/14/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/15/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/17/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/18/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/19/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/20/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/21/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/22/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/24/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/25/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/26/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/27/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/28/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/29/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/30/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/31/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/1/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/3/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/4/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/5/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/6/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/7/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/8/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/10/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/11/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/12/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/13/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/14/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/15/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/17/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/18/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/19/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/20/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/21/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/22/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/24/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/25/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/26/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/27/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/28/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/29/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/30/2006	001	Turbidity, Severity	1/Day	1	0

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March 2006	3/31/2006	001	Turbidity, Severity	1/Day	1	0
May 2006	5/1/2006	001	Chlorine, Total Residual	1/2Weeks	1	0
May 2006	5/15/2006	001	Chlorine, Total Residual	1/2Weeks	1	0
September 2006	9/1/2006	001	Fecal Coliform	1/Month	1	0
October 2006	10/1/2006	001	Fecal Coliform	1/Month	1	0
January 2007	1/1/2007	001	Color, Severity	1/Day	1	0
January 2007	1/3/2007	001	Color, Severity	1/Day	1	0
January 2007	1/4/2007	001	Color, Severity	1/Day	1	0
January 2007	1/5/2007	001	Color, Severity	1/Day	1	0
January 2007	1/6/2007	001	Color, Severity	1/Day	1	0
January 2007	1/7/2007	001	Color, Severity	1/Day	1	0
January 2007	1/8/2007	001	Color, Severity	1/Day	1	0
January 2007	1/10/2007	001	Color, Severity	1/Day	1	0
January 2007	1/11/2007	001	Color, Severity	1/Day	1	0
January 2007	1/12/2007	001	Color, Severity	1/Day	1	0
January 2007	1/13/2007	001	Color, Severity	1/Day	1	0
January 2007	1/14/2007	001	Color, Severity	1/Day	1	0
January 2007	1/15/2007	001	Color, Severity	1/Day	1	0
January 2007	1/16/2007	001	Color, Severity	1/Day	1	0
January 2007	1/17/2007	001	Color, Severity	1/Day	1	0
January 2007	1/19/2007	001	Color, Severity	1/Day	1	0
January 2007	1/20/2007	001	Color, Severity	1/Day	1	0
January 2007	1/21/2007	001	Color, Severity	1/Day	1	0
January 2007	1/22/2007	001	Color, Severity	1/Day	1	0
January 2007	1/24/2007	001	Color, Severity	1/Day	1	0
January 2007	1/25/2007	001	Color, Severity	1/Day	1	0
January 2007	1/26/2007	001	Color, Severity	1/Day	1	0
January 2007	1/27/2007	001	Color, Severity	1/Day	1	0
January 2007	1/28/2007	001	Color, Severity	1/Day	1	0
January 2007	1/29/2007	001	Color, Severity	1/Day	1	0
January 2007	1/30/2007	001	Color, Severity	1/Day	1	0
January 2007	1/31/2007	001	Color, Severity	1/Day	1	0
January 2007	1/1/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/3/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/4/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/5/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/6/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/7/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/8/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/10/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/11/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/12/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/13/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/14/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/15/2007	001	Odor, Severity	1/Day	1	0

January 2007	1/16/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/17/2007	001	Odor, Severity	1/Day	1	0
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January 2007	1/26/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/27/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/28/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/29/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/30/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/31/2007	001	Odor, Severity	1/Day	1	0
January 2007	1/1/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/3/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/4/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/5/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/6/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/7/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/8/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/10/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/11/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/12/2007	001	Turbidity, Severity	1/Day	1	0
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January 2007	1/20/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/21/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/22/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/24/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/25/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/26/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/27/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/28/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/29/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/30/2007	001	Turbidity, Severity	1/Day	1	0
January 2007	1/31/2007	001	Turbidity, Severity	1/Day	1	0
April 2007	4/1/2007	001	Fecal Coliform	1/Month	1	0
April 2007	4/1/2007	001	Chlorine, Total Residual	1/2Weeks	1	0
April 2007	4/15/2007	001	Chlorine, Total Residual	1/2Weeks	1	0

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

1. We understand that B&J Environmental has been routinely submitting electronic monthly operating reports for the facility. 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. As such, reports for companies can only be signed and certified by a corporate officer, general partner, 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.***

Copies of all reports, and substantiating documentation, shall be maintained on site for a period of at least 3 years.

2. Ohio Administrative Code (OAC)3745-7-02 requires that you have a written 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 services (i.e., **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of the contract for submission of Monthly Operating Reports. A copy of the completed contract should be forwarded to this office.
3. The facility currently utilizes Geauga County Laboratory for the analyses of Total Suspended Solids, CBOD, Ammonia-N, and Fecal Coliform. The facility shall ensure that detailed analytical reports, including a complete chain of custody record, are received from its contract laboratory.

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4. Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures shall be developed for all analyses performed on site, e.g., pH, DO, etc. Calibration records must be maintained for all in-house analytical instrumentation.
5. Please note that values of "0" should not be reported on the monthly reports for analytical parameters, e.g. Chlorine. An "AA" code shall be utilized whenever the reported result is below the method detection limit (MDL) of the test procedure.

Summary/Conclusion

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 this office.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt