



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 28, 2007

RE: TRUMBULL COUNTY
VIENNA TOWNSHIP
FOUR SEASONS MHP
NPDES PERMIT NO.OH004510
OHIO EPA PERMIT NO.3PV00025

Mr. William Hagood
Tri-City Mobile Homes, Inc.
Four Seasons Mobile Home Park
1394 State Route 193
Vienna, OH 44473

Dear Mr. Hagood:

On June 21, 2007, an Operation and Maintenance Inspection was conducted of the wastewater treatment plant serving Four Seasons Mobile Home Park. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

Inspection Findings/Compliance Status

The wet-stream treatment components consist of preliminary treatment (trash trap), flow equalization basin, 35,000-gpd extended aeration activated sludge treatment process, final settling tank, upflow clarifier, surface sand filtration, and chlorination/dechlorination contact tank. 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 from the facility was visually clear.
2. The facility should follow a regimented schedule for wasting sludge to the holding tank.
3. Please ensure that the flow meter is calibrated on a yearly basis by a certified technician.
4. Tablets were added to the dechlorination unit during the inspection. Please ensure that the feed systems are checked daily and replenished as necessary.
5. A fence should be installed around the plant to prevent unauthorized entry into the facility. Additionally, sturdy grating must be placed over all tank openings, e.g., clarifiers.

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:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2007	001	Chlorine, Total Residual	1D Conc	0.019	0.07	5/1/2007
June 2006	001	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.78	6/1/2006
October 2006	001	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.53	10/1/2006
March 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	13.0	13.7	3/1/2006
June 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	3.0	5.09	6/1/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	3.0	4.97	10/22/2006
August 2006	001	Nitrogen, Ammonia (NH3)	7D Qty	0.4	0.43	8/1/2006
August 2006	001	Total Suspended Solids	30D Qty	1.6	1.8	8/1/2006

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

1. Ohio Administrative Code (OAC) 3745-7-02 requires that you have a 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.
2. Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures shall be developed for all analyses performed onsite, e.g., pH, Chlorine, DO, etc. Calibration records must be maintained for all in-house analytical instrumentation.
3. The facility currently utilizes Valley Environmental Labs, Inc., for the analyses of Total Suspended Solids, CBOD, Ammonia-N, and Fecal Coliform. The facility shall ensure that certified detailed analytical reports, including a complete chain of custody record, are received from its contract laboratory.

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