



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

February 22, 2011

RE: TRUMBULL COUNTY  
WEATHERSFIELD TOWNSHIP  
BRENTWOOD MOBILE MANOR  
2990 DEFOREST-TOWNLINE ROAD  
NPDES PERMIT NO. OH0107506  
OHIO EPA PERMIT NO. 3PV00065

Mr. Jack Boyd Smith  
P.O. Box 1968  
1810 Lusher Avenue  
Elkart, Indiana 46515

Dear Mr. Smith:

On February 16, 2011, Mr. Richard Curl of the Trumbull County Health Department, Mr. Dean Stoll of the Ohio EPA, and the undersigned conducted an inspection of the wastewater treatment plant located at the above referenced address. 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, 32,000 gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge handling consists of an aerated sludge holding tank.

At the time of the inspection, the overall performance of the treatment plant appeared to be satisfactory. The effluent discharge to the receiving stream appeared to be of satisfactory visual quality. However, several site specific deficiencies were observed. They include the following:

- One of the two aeration blowers was inoperative. Additionally, the missing safety guards have yet to be replaced around the blower belt mechanisms.
- Several of the connections between pipes and concrete tank walls throughout the plant are deteriorating badly. Some of these joints have pulled apart completely, leaving large holes.
- Several of the grates over the various tanks were quite rusty, and appeared to have a reduced load-bearing capacity.
- The filter on the blower motor that serves the equalization tank was not secured to the motor. Additionally, metal bits were observed entering the motor unit. The filter should be replaced, and securely fastened to the motor.
- Excessive "slap" was observed in the belt on the equalization tank motor. The belt needs to be tightened.

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- Heavy vegetation and debris were observed in the sand filter beds. The vegetation and debris need to be removed and the filter beds raked.
- The filter sand does not appear to meet EPA size specifications (effective size 0.4 - 1.0 mm, uniformity coefficient not greater than 3.0).
- The concrete distribution box for the sand filters is deteriorating badly.
- The concrete dividing wall between the two south filter beds has a large crack that was leaking.
- Detailed records of all plant visits and any work done at the plant must be maintained on-site and recorded in a bound and numbered book. Loose sheets are not acceptable as the sole means of recording site visits.
- The overflow pipes in the sand filter beds are not permitted.

A review of the facility's monthly Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period December 2008 through February 2011 indicates violations of the effluent limitations contained in the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2009	001	80082	CBOD 5 day	1D Conc	15	29.	1/6/2009
January 2009	001	80082	CBOD 5 day	30D Conc	10	12.95	1/1/2009
January 2009	001	80082	CBOD 5 day	1D Qty	1.8	1.86601	1/6/2009
April 2009	001	00530	Total Suspended Solids	1D Conc	18	25.	4/15/2009
April 2009	001	00530	Total Suspended Solids	1D Qty	2.2	6.71838	4/15/2009
April 2009	001	00530	Total Suspended Solids	30D Qty	1.5	2.35711	4/1/2009
April 2009	001	80082	CBOD 5 day	1D Conc	15	25.	4/15/2009
April 2009	001	80082	CBOD 5 day	1D Qty	1.8	6.71838	4/15/2009
April 2009	001	80082	CBOD 5 day	30D Qty	1.2	1.95741	4/1/2009
May 2009	001	00530	Total Suspended Solids	1D Conc	18	22.	5/19/2009
May 2009	001	80082	CBOD 5 day	1D Conc	15	20.	5/5/2009
May 2009	001	80082	CBOD 5 day	30D Conc	10	10.3	5/1/2009
June 2009	001	00530	Total Suspended Solids	1D Conc	18	19.	6/16/2009
July 2009	001	00530	Total Suspended Solids	1D Qty	2.2	3.1794	7/22/2009
February 2010	001	00530	Total Suspended Solids	1D Qty	2.2	2.45268	2/23/2010
September 2010	001	00530	Total Suspended Solids	1D Conc	18	26.	9/9/2010
September 2010	001	00530	Total Suspended Solids	1D Conc	18	23.	9/23/2010
September 2010	001	00530	Total Suspended Solids	30D Conc	12	16.75	9/1/2010
December 2010	001	00530	Total Suspended Solids	1D Qty	2.2	6.07493	12/1/2010
December 2010	001	00530	Total Suspended Solids	30D Qty	1.5	2.19719	12/1/2010
December 2010	001	80082	CBOD 5 day	1D Qty	1.8	2.99696	12/1/2010

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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 referenced violations and/or deficiencies. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Ohio EPA was recently notified that the Trumbull County Health Department sent out a notice dated February 4, 2011 requiring the abandonment of the existing treatment works due to sanitary sewers recently becoming available and accessible along Deforest-Townline Road. Proper abandonment of an existing treatment works and connecting to available public sanitary sewers is a requirement of Ohio Administrative Code 3745-33-08, and is also a requirement outlined in Part II of the current NPDES permit, which expires on July 31, 2011. Since Brentwood Mobile Manor is now obligated to connect to the existing sanitary sewers, Ohio EPA will not process the NPDES permit renewal application that was received on December 6, 2010. This office encourages you to work with the County to establish a reasonable timeframe for the connection.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,

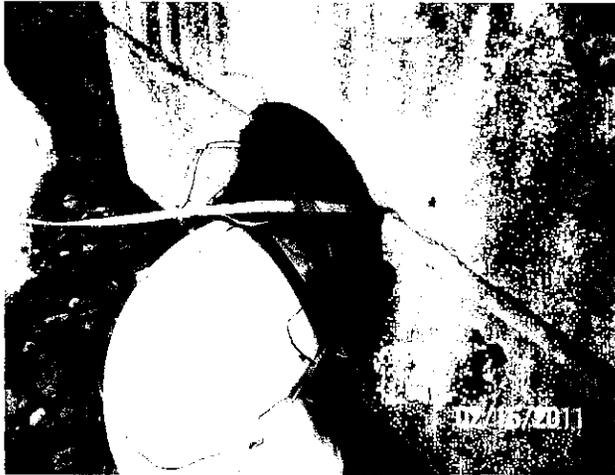


Tomás Parry  
Environmental Engineer II  
Division of Surface Water

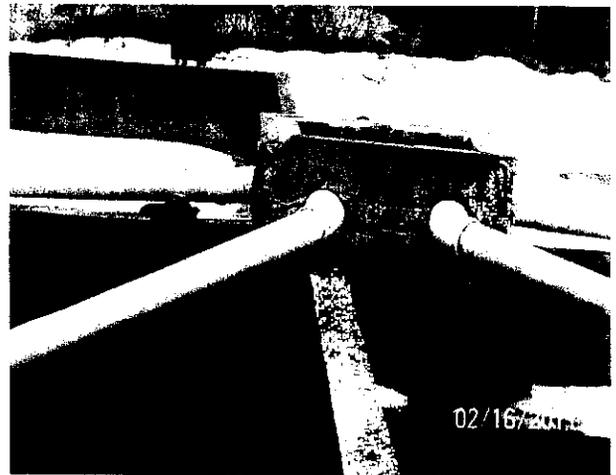
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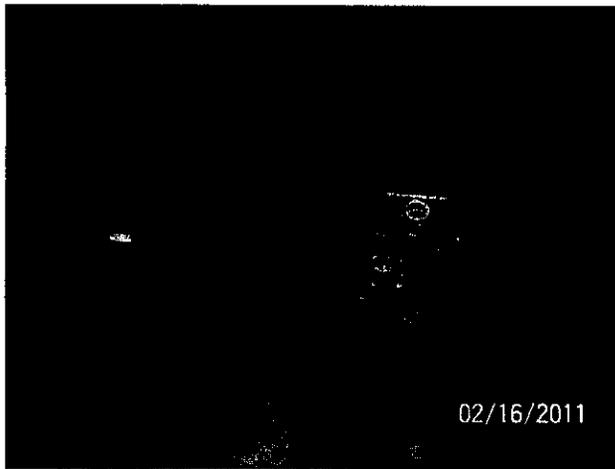
cc: Richard Curl, Trumbull County Health Department  
Valley Environmental Labs



deteriorating pipe connection



deteriorating distribution box



inoperative backup blower motor



leaky crack in dividing wall of sand filters



heavy vegetation in sand filter beds



sand particle size