



**Environmental
Protection Agency**

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

June 2, 2011

RE: TRUMBULL COUNTY
WARREN TOWNSHIP
PLEASANT PARK MOBILE COURT
NPDES PERMIT NO. OH0107522
OHIO EPA PERMIT NO. 3PV00067
COMPLIANCE INSPECTION EVALUATION

Mr. Tom Chiarullo, Manager
Pleasant Park Mobile Court
5029 Parkman Road
Warren, Ohio 44481

Dear Mr. Chiarullo:

On May 24, 2011, this writer conducted an inspection of the sewage treatment plant serving the above referenced facility located at 5029 Parkman Road, Warren, Trumbull County. This writer was accompanied on this inspection by John Schmidt, Virginia Wilson and David Rischar all of the Ohio EPA. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit in conjunction with the renewal of said permit. The last compliance inspection was conducted on June 15, 2010.

The treatment system consists of a trash trap, flow equalization basin, 22,500 gpd extended aeration activated sludge treatment tanks, final settling tank, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of an aerated sludge holding tank and sludge drying beds. The facility discharges to Chocolate Run adjacent to the facility.

Observations

Following are observations made during the inspection.

1. The plant is operated by Edward Mosko of Valley Environmental Lab, Inc. on behalf of Pleasant Park Mobile Court. Valley Environmental Lab collects samples and electronically submits the data to the electronic discharge monitoring report (eDMR) system. In Accordance with Ohio Administrative Code (OAC) 3745-7, this facility must provide written notice regarding the name and certification of the designated operator(s) of record for the facility. Please complete the enclosed Operator of Record (ORC) Notification Form and return it to the specified address within 30 days of receipt of this letter.
2. Log books and the operation and maintenance manual could not be located at the site and were unavailable for inspection.
3. The general operation and maintenance of the treatment plant appear to be satisfactory. However, there are a few problems that require action.

4. The pump station was found in **unsatisfactory condition**. One of the two pumps was out of service and no motor for the second pump was present at the time of the inspection. Please identify how long this pump has been out of service and when it will be reinstalled.
5. The flow equalization tank was found in **unsatisfactory condition**. The blowers were cycled and one of the two blowers was found to be out of service. The alarms were tested and found to be out of service as well. Please indicate how long this equipment has been out of service and a time schedule for when the blower and the alarms will be repaired.
6. The content of the aeration tank had a light brown color and good mixing. Sludge returns were a light brown color with minimal foaming. The blowers were cycled and found to be in operating condition. There appears to be some leakage from around the aeration tanks. Please have this situation investigated and provide documentation to this office that the leak has been repaired.
7. The clarifiers were found in satisfactory condition and the surface was clear. The skimmer and return lines were in proper operation and the effluent channel and weir were clean.
8. The surface sand filter dosing pumps could not be cycled; therefore their operating condition is unknown. The alarms also could not be tested; therefore their operating condition is also unknown. Please provide follow-up on this situation.
9. The surface sand filters need to be raked flat and additional flow distribution, typically 4-6 inch rock, should be placed around the end of the distribution pipe to provide more energy dissipation and avoid scouring the sand. A proper plug should be installed in the distribution pipe not being used and the pipes should be checked for cracks or leaks.
10. The chlorination and dechlorination tanks were stocked with chemicals and operating properly. The chlorine tank appeared to be clear and free of vegetation. The post-disinfection aeration system was also operating properly.
11. The final discharge at the Chocolate Run was observed to be of acceptable visual quality.
12. The facility needs to make improvements to the fencing to prevent unauthorized access to the facility.

NPDES Permit Compliance Review

Pleasant Park Mobile Court operates the Pleasant Park Mobile Court wastewater treatment facility under Ohio NPDES Permit No. 3PR00067. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2010 through May 1, 2011 indicates the following noncompliance of the terms and conditions of your NPDES permit:

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Effluent Limit Violations

The following limit violation was noted for the reporting period reviewed:

<u>Station</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
001	00300	Dissolved Oxygen	1D Conc	5.0	2.2	9/16/2010

Effluent limit violations must be explained, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

The permittee must pursue the fence disrepair as indicated in comment number 12 above in the observation section of this report. The permittee was asked to address this issue in previous inspection letters from this office dated July 2, 2010, and October 10, 2008. This is a compliance violation as written in Part I.C. of the facility's NPDES permit. Please provide documentation that the fence has been repaired.

Other NPDES Violations

Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Part II, Item B requires you to designate an operator of record and notify Ohio EPA of the designated operator of record. Ohio EPA understands that Pleasant Park Mobile Court contracts or may have contracted with Edward Mosko of Valley Environmental Lab, Inc. as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA at the address listed on the form. As a courtesy, please provide a copy of this form in your response to this office.

Based upon the inspection findings and the overall compliance record of the facility, Pleasant Park Mobile Home Park is considered to be in compliance for its Pleasant Park Mobile Home Park wastewater treatment facility; however, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions that will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Along with the compliance inspection evaluation this writer is in the process of reviewing your application for coverage under the NPDES permit. The application has been reviewed and in order to process the permit further the following comments need to be addressed:

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- 1) Form 2E Section IV: Please provide at least one analysis for each pollutant or parameter listed (excluding COD and TOC).
- 2) Form 2S Section I A2: Please provide a line drawing of the sludge handling system.
- 3) Form 2S Section I A4: Please provide a response.
- 4) Form 2S Section I A5: Include the date that the sludge holding tank was installed or last modified.
- 5) Form 2S Section I B: Please fill out this section regarding the amount of sludge generated.
- 6) Form 2S Section I D: Please provide a response as to where the sludge is being taken and fill out the appropriate section for the disposal method.

These comments must be addressed before this office can process this application any further. Please submit revisions to this office within 21 days from the date of this letter. The project will be re-evaluated by this office when the revisions are received. Also, please include the permit number on all correspondence.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1138, or by e-mail at lindsie.macpherson@epa.state.oh.us.

Sincerely,



Lindsie MacPherson
Assistant to the District Engineer
Division of Surface Water

LM/mt



Figure 1: Sand filter beds