

**Environmental  
Protection Agency**

Governor  
Lt. Governor  
Director

October 19, 2011

RE: DFC MOBILE HOME PARK WWTP  
NPDES PERMIT NO. 3PV00081  
LENOX TOWNSHIP, ASHTABULA CO.

**NOTICE OF VIOLATION**

**CERTIFIED MAIL**

Ms. Lois Adkins, Owner  
DFC Mobile Home Park and Sales  
1600 Lenox-New Lyme Road  
Jefferson, OH 44047

Dear Ms. Adkins:

During a review of Ohio EPA's electronic Discharge Monitoring Report (eDMR) information for the above referenced facility at 1600 Lenox-New Lyme Road, Lenox Township, Ashtabula County. The Ohio EPA notes that the facility is in Significant Noncompliance (SNC) for ammonia-nitrogen. The U.S. EPA defines significant noncompliance for ammonia-nitrogen if a facility exceeds the limits established by the facility's National Pollutant Discharge Elimination System (NPDES) Permit by more than 40% for two or more months during the consecutive quarter review. The review period reviewed is January 2010 through August 2011. You were notified of significant noncompliance in letters from this office dated August 5, 2010 and November 8, 2010.

Ohio EPA notes that the system consists of a trash trap, flow equalization basin, extended aeration tanks, clarifiers, dosing tank and surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the clarifier tanks to another POTW. The facility discharges to an unnamed tributary to Mill Creek.

A review of the eDMR information for ammonia-nitrogen indicated the following exceedence:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	3.83	1/1/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.83	1/28/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	13.6	5/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.23679	5/1/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	13.6	5/25/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.23679	5/25/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	9.03	11/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.08886	11/1/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	9.03	11/24/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.08886	11/24/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.56	12/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	9.57	1/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.1304	1/1/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	9.57	1/27/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.1304	1/27/2011

MS. LOIS ADKINS  
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001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	9.4	2/1/2011
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.05	.15655	2/1/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	9.4	2/25/2011
001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.08	.15655	2/25/2011
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.259	4/1/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	12.	4/13/2011
001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.08	.16351	4/13/2011
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	4.82	5/1/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	4.82	5/18/2011
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	7.035	6/1/2011
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.05	.07396	6/1/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	3.17	6/7/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	10.9	6/15/2011
001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.08	.11552	6/15/2011
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	3.17	7/1/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	3.17	7/20/2011

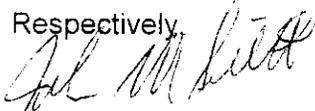
Regarding responses to the violations noted in the August 5, 2010, and November 8, 2010, correspondence, you indicated that you made repairs to your sand filters. Repairs have been completed, yet violations continue. Ohio EPA notes that this facility does not have a designated operator of record, and lack of proper oversight may be contributing to these continuing violations.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions that have been or will be taken to correct the above noncompliance. 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.

If you determine that additional treatment units are necessary in order to achieve compliance, please note that you must submit a Permit-to-Install (PTI) application, along with the necessary application forms, associated fees, and detailed plans and specifications to this office for review. Additional information on the PTI process may be found at <http://epa.ohio.gov/dsw/pti/index.aspx>. Application forms may be found at <http://epa.ohio.gov/dsw/pti/PTIForms.aspx>.

If you have any questions or comments regarding this notification, please feel free to contact me at (330)963-1175.

Respectively,



John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

File: Semipublic/Ashtabula/Lenox Twp./DFC MHP (3PV00081)

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MS. LOIS ADKINS, OWNER  
 DFC MOBILE HOME PARK AND  
 SALES  
 1600 LENOX-NEW LYME ROAD  
 JEFFERSON, OH 44047

2. Article Number

(Transfer from service label)

7008 3230 0003 5419 6813

Schmidt  
10/19/11

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Lois Adkins*

- Agent
- Addressee

B. Received by (Printed Name)

Lois Adkins

C. Date of Delivery

D. Is delivery address different from Item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- Certified Mail
- Registered
- Insured Mail
- Express Mail
- Return Receipt for Merchandise
- C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

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MS. LOIS ADKINS, OWNER  
 DFC MOBILE HOME PARK AND  
 SALES  
 1600 LENOX-NEW LYME ROAD  
 JEFFERSON, OH 44047

10/19/11

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