



State of Ohio Environmental Protection Agency

Northeast District Office

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2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

August 14, 2007

RE: TRUMBULL COUNTY  
FOWLER TOWNSHIP  
FOWLER MOBILE HOME PARK  
2819 SODOM-HUTCHINGS ROAD  
NPDES PERMIT NO. OH0084140  
OHIO EPA PERMIT NO. 3PV00040

Mr. Lester Swetel  
Fowler Mobile Home Park  
2819 Sodom-Hutchings Road  
Fowler, OH 44418

Dear Mr. Swetel:

An inspection was conducted by the undersigned of the sanitary wastewater treatment plant serving the above referenced facility on August 1, 2007. The facility was represented by your contract operator, Mr. Dwane Stull. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

**Inspection Findings/Compliance Status**

The current 12,000-gallon/day treatment system consists of an extended aeration activated sludge "package" plant, final settling tank, slow surface sand filtration, sludge holding, and chlorination/dechlorination.

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

1. The plant was producing an effluent of satisfactory visual quality. There was no visual evidence of excessive suspended solids or oil and grease being discharged to "waters of the state".
2. A cover or guard shall be installed over the blower belt(s).
3. Please ensure that the locking bars over all tanks are secured in place to prevent unauthorized access to the tanks.
4. It was noted that an enclosure had been installed around the surface sand filter.

A review of the facility's monthly operating reports received by Ohio EPA for the period August 2005 through June 2007 indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Report Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
Oct 2005	001	Chlorine, Total Residual	1D Conc	0.038	0.05	10/5/2005
May 2006	001	Fecal Coliform	30D Conc	1000	1500	5/1/2006
Jul 2006	001	Chlorine, Total Residual	1D Conc	0.038	0.06	7/5/2006
Aug 2006	001	Chlorine, Total Residual	1D Conc	0.038	0.06	8/16/2006
Sep 2006	001	Chlorine, Total Residual	1D Conc	0.038	0.09	9/6/2006
Sep 2006	001	Chlorine, Total Residual	1D Conc	0.038	0.06	9/20/2006

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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.

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

1. We understand that Mr. Stull 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 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.
3. The facility currently utilizes North Coast Environmental Laboratories, Inc., Streetsboro, 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.
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, Chlorine, etc. Calibration records must be maintained for all in-house analytical instrumentation.

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**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 me at (330) 963-1196.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mt