



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

June 29, 2007

RE: TRUMBULL COUNTY
HUBBARD TOWNSHIP
STONEBROOKE VILLAGE MHP
2870 SEIFERT-LEWIS ROAD
NPDES PERMIT NO. OH0092461
OHIO EPA PERMIT NO. 3PY00001

Mr. Carl Casale, Owner
Stoneybrooke Village Mobile Home Park
2870 Seifert-Lewis Road
Hubbard, OH 44425

Dear Mr. Casale:

On June 18, 2007, an inspection was conducted at the above referenced facility by the undersigned. The purpose of the inspection was to evaluate the facility's compliance status with respect to 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), 30,000-gpd extended aeration activated sludge treatment process, final settling tank, tertiary sand filtration, and disinfection. Sludge handling consists of an aerated sludge holding tank.

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

1. All treatment units appeared to be in operation.
2. There appeared to a consistent pin floc flowing over the clarifier weir. As evidenced by the excessive accumulation of solids, the walls of the clarifier appeared to be in need of cleaning.
3. The walls of the surface sand filters need to be rehabilitated or replaced. Additionally, the 8-inch overflow pipe must be removed.
4. The chlorine tablets in the feed chamber were not in contact with the flowing water. Hence, the wastewater was not being disinfected as required by the permit. Additionally, there were no tablets in the dechlorination unit. The feed units must be checked on a daily basis and replenished as necessary.
5. Please ensure that the flow meter is calibrated on a yearly basis by a certified technician.
6. The sludge stored in the plastic bags is considered to be a solid waste and, hence, must be disposed at a solid waste landfill.
7. A cover or guard shall be installed over the blower belts.
8. Acceptable grating and/or guardrail shall be installed over/around all open tanks, e.g., aeration tank.
9. All exposed wiring, particularly those running along the ground, must be placed in conduit. Connection must be made in approved boxes.

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A review of the monthly operating reports received by Ohio EPA for the period January 2005 through May 2007 indicates violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Effluent Limitation Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2005	001	CBOD 5 day	7D Qty	1.7	2.0	12/15/2005
May 2006	001	Chlorine, Total Residual	1D Conc	0.019	.08	5/18/2006
May 2006	001	Chlorine, Total Residual	1D Conc	0.019	.06	5/22/2006
January 2005	001	Dissolved Oxygen	1D Conc	5.0	4.6	1/3/2005
January 2005	001	Dissolved Oxygen	1D Conc	5.0	4.6	1/12/2005
January 2005	001	Dissolved Oxygen	1D Conc	5.0	4.4	1/24/2005
February 2005	001	Dissolved Oxygen	1D Conc	5.0	3.6	2/3/2005
April 2005	001	Dissolved Oxygen	1D Conc	5.0	4.1	4/20/2005
December 2005	001	Dissolved Oxygen	1D Conc	5.0	4.4	12/6/2005
June 2006	001	Dissolved Oxygen	1D Conc	5.0	4.7	6/20/2006
June 2006	001	Dissolved Oxygen	1D Conc	5.0	4.3	6/27/2006
July 2006	001	Dissolved Oxygen	1D Conc	5.0	4.	7/3/2006
January 2007	001	Dissolved Oxygen	1D Conc	5.0	4.6	1/2/2007
April 2007	001	Dissolved Oxygen	1D Conc	5.0	3.9	4/24/2007
May 2007	001	Dissolved Oxygen	1D Conc	5.0	2.9	5/1/2007
May 2007	001	Dissolved Oxygen	1D Conc	5.0	4.	5/15/2007
May 2007	001	Dissolved Oxygen	1D Conc	5.0	3.3	5/29/2007
December 2005	001	pH	1D Conc	6.5	6.1	12/6/2005
December 2005	001	Total Suspended Solids	30D Qty	1.4	1.6	12/1/2005
December 2005	001	Total Suspended Solids	7D Qty	2.0	3.1	12/15/2005

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
February 2005	2/8/2005	001	CBOD 5 day	1/Week	1	0
February 2005	2/8/2005	001	CBOD 5 day	1/Week	1	0
February 2005	2/8/2005	001	CBOD 5 day	1/Week	1	0
February 2005	2/8/2005	001	CBOD 5 day	1/Week	1	0
March 2005	3/8/2005	001	CBOD 5 day	1/Week	1	0
June 2005	6/8/2005	001	CBOD 5 day	1/Week	1	0
September 2005	9/8/2005	001	CBOD 5 day	1/Week	1	0
October 2005	10/3/2005	001	Chlorine, Total Residual	1/Day	1	0
October 2005	10/4/2005	001	Chlorine, Total Residual	1/Day	1	0
June 2006	6/2/2006	001	Chlorine, Total Residual	1/Day	1	0
August 2006	8/1/2006	001	Chlorine, Total Residual	1/Day	1	0
September 2006	9/1/2006	001	Chlorine, Total Residual	1/Day	1	0
February 2005	2/1/2005	001	Color, Severity	1/Day	1	0
February 2005	2/4/2005	001	Color, Severity	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
February 2005	2/11/2005	001	Color, Severity	1/Day	1	0
February 2005	2/23/2005	001	Color, Severity	1/Day	1	0
March 2005	3/1/2005	001	Color, Severity	1/Day	1	0
October 2005	10/3/2005	001	Color, Severity	1/Day	1	0
October 2005	10/4/2005	001	Color, Severity	1/Day	1	0
October 2005	10/31/2005	001	Color, Severity	1/Day	1	0
December 2005	12/1/2005	001	Color, Severity	1/Day	1	0
December 2005	12/2/2005	001	Color, Severity	1/Day	1	0
December 2005	12/5/2005	001	Color, Severity	1/Day	1	0
December 2005	12/16/2005	001	Color, Severity	1/Day	1	0
December 2005	12/22/2005	001	Color, Severity	1/Day	1	0
December 2005	12/23/2005	001	Color, Severity	1/Day	1	0
December 2005	12/26/2005	001	Color, Severity	1/Day	1	0
January 2006	1/31/2006	001	Color, Severity	1/Day	1	0
February 2006	2/28/2006	001	Color, Severity	1/Day	1	0
March 2006	3/24/2006	001	Color, Severity	1/Day	1	0
April 2006	4/3/2006	001	Color, Severity	1/Day	1	0
April 2006	4/27/2006	001	Color, Severity	1/Day	1	0
May 2006	5/1/2006	001	Color, Severity	1/Day	1	0
May 2006	5/18/2006	001	Color, Severity	1/Day	1	0
June 2006	6/2/2006	001	Color, Severity	1/Day	1	0
August 2006	8/1/2006	001	Color, Severity	1/Day	1	0
September 2006	9/1/2006	001	Color, Severity	1/Day	1	0
November 2006	11/1/2006	001	Color, Severity	1/Day	1	0
April 2007	4/27/2007	001	Color, Severity	1/Day	1	0
May 2007	5/4/2007	001	Color, Severity	1/Day	1	0
February 2005	2/8/2005	001	Dissolved Oxygen	1/Week	1	0
March 2005	3/8/2005	001	Dissolved Oxygen	1/Week	1	0
June 2005	6/8/2005	001	Dissolved Oxygen	1/Week	1	0
September 2005	9/8/2005	001	Dissolved Oxygen	1/Week	1	0
April 2007	4/15/2007	001	Dissolved Oxygen	1/Week	1	0
February 2005	2/1/2005	001	Odor, Severity	1/Day	1	0
February 2005	2/4/2005	001	Odor, Severity	1/Day	1	0
February 2005	2/11/2005	001	Odor, Severity	1/Day	1	0
February 2005	2/23/2005	001	Odor, Severity	1/Day	1	0
March 2005	3/1/2005	001	Odor, Severity	1/Day	1	0
October 2005	10/3/2005	001	Odor, Severity	1/Day	1	0
October 2005	10/4/2005	001	Odor, Severity	1/Day	1	0
October 2005	10/31/2005	001	Odor, Severity	1/Day	1	0
December 2005	12/1/2005	001	Odor, Severity	1/Day	1	0
December 2005	12/2/2005	001	Odor, Severity	1/Day	1	0
December 2005	12/5/2005	001	Odor, Severity	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
December 2005	12/16/2005	001	Odor, Severity	1/Day	1	0
December 2005	12/22/2005	001	Odor, Severity	1/Day	1	0
December 2005	12/23/2005	001	Odor, Severity	1/Day	1	0
December 2005	12/26/2005	001	Odor, Severity	1/Day	1	0
January 2006	1/31/2006	001	Odor, Severity	1/Day	1	0
February 2006	2/28/2006	001	Odor, Severity	1/Day	1	0
March 2006	3/24/2006	001	Odor, Severity	1/Day	1	0
April 2006	4/3/2006	001	Odor, Severity	1/Day	1	0
April 2006	4/27/2006	001	Odor, Severity	1/Day	1	0
May 2006	5/1/2006	001	Odor, Severity	1/Day	1	0
May 2006	5/18/2006	001	Odor, Severity	1/Day	1	0
June 2006	6/2/2006	001	Odor, Severity	1/Day	1	0
August 2006	8/1/2006	001	Odor, Severity	1/Day	1	0
September 2006	9/1/2006	001	Odor, Severity	1/Day	1	0
November 2006	11/1/2006	001	Odor, Severity	1/Day	1	0
April 2007	4/27/2007	001	Odor, Severity	1/Day	1	0
May 2007	5/4/2007	001	Odor, Severity	1/Day	1	0
February 2005	2/8/2005	001	pH	1/Week	1	0
February 2005	2/8/2005	001	pH	1/Week	1	0
March 2005	3/8/2005	001	pH	1/Week	1	0
June 2005	6/8/2005	001	pH	1/Week	1	0
September 2005	9/8/2005	001	pH	1/Week	1	0
February 2005	2/8/2005	001	Total Suspended Solids	1/Week	1	0
February 2005	2/8/2005	001	Total Suspended Solids	1/Week	1	0
February 2005	2/8/2005	001	Total Suspended Solids	1/Week	1	0
February 2005	2/8/2005	001	Total Suspended Solids	1/Week	1	0
March 2005	3/8/2005	001	Total Suspended Solids	1/Week	1	0
June 2005	6/8/2005	001	Total Suspended Solids	1/Week	1	0
September 2005	9/8/2005	001	Total Suspended Solids	1/Week	1	0
February 2005	2/1/2005	001	Turbidity, Severity	1/Day	1	0
February 2005	2/4/2005	001	Turbidity, Severity	1/Day	1	0
February 2005	2/11/2005	001	Turbidity, Severity	1/Day	1	0
February 2005	2/23/2005	001	Turbidity, Severity	1/Day	1	0
March 2005	3/1/2005	001	Turbidity, Severity	1/Day	1	0
October 2005	10/3/2005	001	Turbidity, Severity	1/Day	1	0
October 2005	10/4/2005	001	Turbidity, Severity	1/Day	1	0
October 2005	10/31/2005	001	Turbidity, Severity	1/Day	1	0
December 2005	12/1/2005	001	Turbidity, Severity	1/Day	1	0
December 2005	12/2/2005	001	Turbidity, Severity	1/Day	1	0
December 2005	12/5/2005	001	Turbidity, Severity	1/Day	1	0
December 2005	12/16/2005	001	Turbidity, Severity	1/Day	1	0
December 2005	12/22/2005	001	Turbidity, Severity	1/Day	1	0

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Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
December 2005	12/23/2005	001	Turbidity, Severity	1/Day	1	0
December 2005	12/26/2005	001	Turbidity, Severity	1/Day	1	0
January 2006	1/31/2006	001	Turbidity, Severity	1/Day	1	0
February 2006	2/28/2006	001	Turbidity, Severity	1/Day	1	0
March 2006	3/24/2006	001	Turbidity, Severity	1/Day	1	0
April 2006	4/3/2006	001	Turbidity, Severity	1/Day	1	0
April 2006	4/27/2006	001	Turbidity, Severity	1/Day	1	0
May 2006	5/1/2006	001	Turbidity, Severity	1/Day	1	0
May 2006	5/18/2006	001	Turbidity, Severity	1/Day	1	0
June 2006	6/2/2006	001	Turbidity, Severity	1/Day	1	0
August 2006	8/1/2006	001	Turbidity, Severity	1/Day	1	0
September 2006	9/1/2006	001	Turbidity, Severity	1/Day	1	0
November 2006	11/1/2006	001	Turbidity, Severity	1/Day	1	0
April 2007	4/27/2007	001	Turbidity, Severity	1/Day	1	0
May 2007	5/4/2007	001	Turbidity, Severity	1/Day	1	0
February 2005	2/1/2005	001	Water Temperature	1/Day	1	0
February 2005	2/4/2005	001	Water Temperature	1/Day	1	0
February 2005	2/11/2005	001	Water Temperature	1/Day	1	0
February 2005	2/23/2005	001	Water Temperature	1/Day	1	0
March 2005	3/1/2005	001	Water Temperature	1/Day	1	0
October 2005	10/3/2005	001	Water Temperature	1/Day	1	0
October 2005	10/4/2005	001	Water Temperature	1/Day	1	0
October 2005	10/31/2005	001	Water Temperature	1/Day	1	0
December 2005	12/1/2005	001	Water Temperature	1/Day	1	0
December 2005	12/2/2005	001	Water Temperature	1/Day	1	0
December 2005	12/5/2005	001	Water Temperature	1/Day	1	0
December 2005	12/16/2005	001	Water Temperature	1/Day	1	0
December 2005	12/22/2005	001	Water Temperature	1/Day	1	0
December 2005	12/23/2005	001	Water Temperature	1/Day	1	0
December 2005	12/26/2005	001	Water Temperature	1/Day	1	0
January 2006	1/31/2006	001	Water Temperature	1/Day	1	0
February 2006	2/28/2006	001	Water Temperature	1/Day	1	0
March 2006	3/24/2006	001	Water Temperature	1/Day	1	0
April 2006	4/3/2006	001	Water Temperature	1/Day	1	0
April 2006	4/27/2006	001	Water Temperature	1/Day	1	0
May 2006	5/1/2006	001	Water Temperature	1/Day	1	0
May 2006	5/18/2006	001	Water Temperature	1/Day	1	0
June 2006	6/2/2006	001	Water Temperature	1/Day	1	0
August 2006	8/1/2006	001	Water Temperature	1/Day	1	0
September 2006	9/1/2006	001	Water Temperature	1/Day	1	0
November 2006	11/1/2006	001	Water Temperature	1/Day	1	0
March 2007	3/1/2007	001	Water Temperature	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
March 2007	3/2/2007	001	Water Temperature	1/Day	1	0
March 2007	3/5/2007	001	Water Temperature	1/Day	1	0
March 2007	3/7/2007	001	Water Temperature	1/Day	1	0
March 2007	3/8/2007	001	Water Temperature	1/Day	1	0
March 2007	3/9/2007	001	Water Temperature	1/Day	1	0
April 2007	4/27/2007	001	Water Temperature	1/Day	1	0
May 2007	5/4/2007	001	Water Temperature	1/Day	1	0

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

1. We understand that Valley Environmental Labs 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 three 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.

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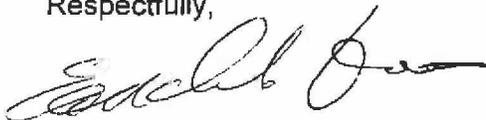
3. The facility shall ensure that certified analytical reports, including a complete chain of custody record, are received from its contract laboratory.
4. Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures shall be developed for all analyses performed on site, e.g., pH, DO, etc. Calibration records must be maintained for all in-house analytical instrumentation.

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