



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 10, 2008

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

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

Dear Mr. Casale:

On November 5, 2008, an inspection was conducted at the above referenced facility by the undersigned. In attendance were representatives of Valley Environmental Lab, Inc. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the NPDES permit. In addition, information gathered during the inspection will be utilized in determining the renewal status of the NPDES permit.

Inspection Findings/Compliance Status

The wet-stream treatment components consist of a trash trap, flow equalization basin, 30,000 gpd extended aeration activated sludge treatment process, final settling tank, tertiary slow surface sand filtration, and chlorination/dechlorination. Sludge handling consists of an aerated sludge holding tank and sludge drying beds. Final effluent discharge is to a tributary of Crab Creek.

At the time of the inspection, the general operation and maintenance of the treatment plant appeared to be satisfactory. The final effluent was clear with no observable adverse impact to the receiving stream. There was no evidence of an unusual or uncharacteristic nuisance odor.

A review of the facility's Discharge Monitoring Reports (EPA Form 4500) received by Ohio EPA for the period June 2007 through October 2008 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
July 2007	001	Dissolved Oxygen	1D Conc	5.0	3.	7/17/2007
July 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	7.4	9.54	7/22/2007
July 2007	001	Dissolved Oxygen	1D Conc	5.0	3.3	7/24/2007
August 2007	001	Dissolved Oxygen	1D Conc	5.0	2.5	8/8/2007
June 2008	001	Dissolved Oxygen	1D Conc	5.0	4.5	6/10/2008
July 2008	001	Dissolved Oxygen	1D Conc	5.0	4.2	7/8/2008

Monitoring/Reporting Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2007	001	Water Temperature	1/Day	1	0	06/01/2007
June 2007	001	Color, Severity	1/Day	1	0	06/01/2007
June 2007	001	Odor, Severity	1/Day	1	0	06/01/2007
June 2007	001	Turbidity, Severity	1/Day	1	0	06/01/2007
June 2007	001	Chlorine, Total Residu	1/Day	1	0	06/01/2007
October 2007	001	Water Temperature	1/Day	1	0	10/01/2007
October 2007	001	Color, Severity	1/Day	1	0	10/01/2007
October 2007	001	Odor, Severity	1/Day	1	0	10/01/2007
October 2007	001	Turbidity, Severity	1/Day	1	0	10/01/2007
October 2007	001	Chlorine, Total Residu	1/Day	1	0	10/01/2007
December 2007	001	Water Temperature	1/Day	1	0	12/03/2007
December 2007	001	Color, Severity	1/Day	1	0	12/03/2007
December 2007	001	Odor, Severity	1/Day	1	0	12/03/2007
December 2007	001	Turbidity, Severity	1/Day	1	0	12/03/2007
December 2007	001	Water Temperature	1/Day	1	0	12/24/2007
December 2007	001	Color, Severity	1/Day	1	0	12/24/2007
December 2007	001	Odor, Severity	1/Day	1	0	12/24/2007
December 2007	001	Turbidity, Severity	1/Day	1	0	12/24/2007
January 2008	001	Water Temperature	1/Day	1	0	01/14/2008
January 2008	001	Color, Severity	1/Day	1	0	01/14/2008
January 2008	001	Odor, Severity	1/Day	1	0	01/14/2008
January 2008	001	Turbidity, Severity	1/Day	1	0	01/14/2008
February 2008	001	Water Temperature	1/Day	1	0	02/01/2008
February 2008	001	Color, Severity	1/Day	1	0	02/01/2008
February 2008	001	Odor, Severity	1/Day	1	0	02/01/2008
February 2008	001	Turbidity, Severity	1/Day	1	0	02/01/2008
February 2008	001	Water Temperature	1/Day	1	0	02/04/2008
February 2008	001	Color, Severity	1/Day	1	0	02/04/2008
February 2008	001	Odor, Severity	1/Day	1	0	02/04/2008
February 2008	001	Turbidity, Severity	1/Day	1	0	02/04/2008
May 2008	001	Water Temperature	1/Day	1	0	05/23/2008
May 2008	001	Color, Severity	1/Day	1	0	05/23/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/23/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/23/2008
May 2008	001	Chlorine, Total Residu	1/Day	1	0	05/23/2008

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

- We understand that Valley Environmental is currently submitting the electronic DMRs (eDMRs) for the facility. Pursuant to Part III, Item 28 of your NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the

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requirements of 40 CFR 122.22". 40 CFR 122.22 (a) states that reports for corporations can only be signed and certified by a responsible corporate officer or by a duly authorized representative of said individual. Delegations of authority must be made in writing to the Director of Ohio EPA.

Ohio EPA has recently revised the electronic data reporting process, including the assignment of Personal Identification Numbers (PINs), to comply with new federal regulations. Information regarding this new process is available at:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

- Pursuant to the new recordkeeping requirements contained in Ohio Administrative Code (OAC) 3745-7-09, specific operation and maintenance records of the treatment system must now be kept on file at the facility. The complete Operator Certification rules are available online at <http://www.epa.state.oh.us/ddagw/oac.html>.

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 violations and/or deficiencies. Your response should include specific dates for completion of the actions.

Summary/Conclusion

The above compliance issues notwithstanding, based on the inspection findings and the facility's recent compliance record, this office anticipates drafting and public-noticing the renewal permit for public review and comment. Comments received during the public-notice period will be considered by Ohio EPA prior to issuance of a final permit. Please be advised, however, that issuance of a final permit will be contingent upon a satisfactory response to the items referenced above.

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