



**Environmental
Protection Agency**

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

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March 15, 2011

RE: TRUMBULL COUNTY
CITY OF HUBBARD
VALLEY MOBILE HOME PARK
NPDES PERMIT NO. OH0128953
OHIO EPA PERMIT NO. 3PV00096

Mr. Todd Jones, Owner
Valley MHP
5925 Youngstown-Hubbard Rd.
Hubbard, OH 44425

Dear Mr. Jones:

On March 9, 2011, an inspection of the above referenced wastewater treatment plant was conducted by Mr. Richard Curl of the Trumbull County Health Department and the undersigned. The purpose of the inspection was to evaluate the operational performance of the treatment system, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The current 15,000 gallon/day treatment system consists of a flow equalization basin, extended aeration activated sludge "package" plant, final settling tank, slow surface sand filtration, sludge holding, and chlorination/dechlorination.

During the inspection, the following observations and deficiencies were noted:

1. Both gates to the plant were unlocked. Gates and fencing around wastewater treatment plants need to be securely locked. We understand that Valley Mobile Home Park (MHP) is currently working on getting new locks for the gates. These new locks need to be obtained and put into use within 10 days of receipt of this letter.
2. There was no visit/maintenance log book on site. Bound and numbered log books should be kept on site as a means to record all site visits by maintenance and operating personnel. Any and all work or maintenance done at the plant should be recorded in these log books, along with the times of arrival and departure. Loose sheets are not acceptable as the sole means of recording site visits.
3. There was very heavy scum buildup in the north clarifier. The scum should be directed into the skimmer pipe to reduce the solids loading on the sand filters. This task should be completed regularly as part of normal plant operation and maintenance.

4. Please be aware that upon renewal of the plant's NPDES permit, there will be language requiring a sign to be placed at the outfall. Details regarding what needs to be displayed on the sign will be described in the new permit.
5. The overflow pipes in the sand filters are illegal, and must be removed.
6. The backup aeration tank blower motor was not operable. It needs to be repaired and available for use at all times.
7. Several of the grates over the various plant tanks were severely rusted. This poses a high risk of grate failure to plant personnel. These grates need to be replaced immediately.
8. The sand filters were full of heavy solids buildup and dense vegetation. The vegetation and accumulated solids need to be completely removed, and the sand raked. Improved performance of the clarifiers will help reduce the solids loading on the sand filters.
9. The fencing on the north side of the maintenance barn is quite low where it connects with the barn. Fencing at this location should be raised to match the height of the rest of the perimeter fencing.
10. Final effluent appeared to be clear.

A review of the facility's monthly discharge monitoring reports (DMRs) received by Ohio EPA for the period, September 2009 – March 2011, indicates violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2009	001	00083	Color, Severity	1/Day	1	0	12/24/2009
December 2009	001	01330	Odor, Severity	1/Day	1	0	12/24/2009
December 2009	001	01350	Turbidity, Severity	1/Day	1	0	12/24/2009
December 2009	001	00083	Color, Severity	1/Day	1	0	12/31/2009
December 2009	001	01330	Odor, Severity	1/Day	1	0	12/31/2009
December 2009	001	01350	Turbidity, Severity	1/Day	1	0	12/31/2009
May 2010	001	00083	Color, Severity	1/Day	1	0	05/28/2010
May 2010	001	01330	Odor, Severity	1/Day	1	0	05/28/2010
May 2010	001	01350	Turbidity, Severity	1/Day	1	0	05/28/2010
July 2010	001	00083	Color, Severity	1/Day	1	0	07/29/2010
July 2010	001	01330	Odor, Severity	1/Day	1	0	07/29/2010
July 2010	001	01350	Turbidity, Severity	1/Day	1	0	07/29/2010
July 2010	001	00083	Color, Severity	1/Day	1	0	07/30/2010

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2010	001	01330	Odor, Severity	1/Day	1	0	07/30/2010
July 2010	001	01350	Turbidity, Severity	1/Day	1	0	07/30/2010
January 2011	001	00083	Color, Severity	1/Day	1	0	01/26/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	01/26/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	01/26/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	01/27/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	01/27/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	01/27/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	01/28/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	01/28/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	01/28/2011
January 2011	001	00083	Color, Severity	1/Day	1	0	01/31/2011
January 2011	001	01330	Odor, Severity	1/Day	1	0	01/31/2011
January 2011	001	01350	Turbidity, Severity	1/Day	1	0	01/31/2011

Since there will be a number of changes made to the new NPDES permit, Ohio EPA advises that the permittee read through it carefully once it is issued. The new permit will be phasing out fecal coliform monitoring limits, and replacing it with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. The permittee will also be required to begin monitoring right away for Total Kjeldahl Nitrogen (TKN), Nitrite and Nitrate, and Phosphorus. Monitoring requirements for all new parameters will be described in the new permit.

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

- Ohio Administrative Code (OAC) 3745-7 requires that you have an up-to-date 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 onsite services (i.e. **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. If applicable, the signatory authority required pursuant to 40 CFR 122.22 (b) must be addressed under the terms of the contract for submission of DMRs. Please provide to this office a copy of the contract between Valley MHP and its certified plant operator.

Ohio EPA has no records on file that identify a certified operator for this plant. Please complete and submit the enclosed Operator of Record Notification form so that this requirement is met.

- Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures **shall be** developed for all analyses **required** to be performed onsite, e.g. pH, DO, etc. Calibration and maintenance records must be maintained for the analytical instrumentation.
- The facility shall make sure that detailed analytical reports, including a complete chain of custody record, are received from the laboratory.

We understand that Mr. Ed Mosko and Mr. Brian Mosko, of Valley Environmental Labs, Inc., have been routinely submitting the DMRs electronically via an assigned Personal Identification Number (PIN). 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". 40 CFR 122.22 (a) states that reports for a sole proprietorship can only be signed and certified by the 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.***

Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of a written contract between Valley MHP and a state-certified operator. A copy of the contract must be submitted to Ohio EPA. As the permit holder, it is the owner's responsibility to perform all daily operation and maintenance obligations not otherwise delegated to the certified operator.

Valley Mobile Home Park has been discharging treated effluent without coverage of an up-to-date NPDES permit since December 31, 2010, which is when the previous permit expired. While Ohio EPA did receive a permit renewal application, several key pieces of information were missing. An application for renewal cannot be processed until it is considered complete.

Mr. Todd Jones
Valley MHP
March 15, 2011
Page 5

Ohio EPA contacted Valley Environmental Labs, the company that prepared and submitted the renewal application, about several items in the application that needed to be revised before it could be considered complete. During a follow-up phone call, Valley explained that the revisions had been made, and the amended application sent to Mr. Todd Jones for him to sign and forward to Ohio EPA. To date, this office has not received the requested modifications. Continued discharge of treated sewage to waters of the state without the coverage of an NPDES permit is a direct violation of OAC 3745, and could subject the facility to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code.

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. Please inform this office, in writing, within 10 days of receipt of this notification, as to the actions that will be taken 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 at (330) 963-1120.

Respectfully,

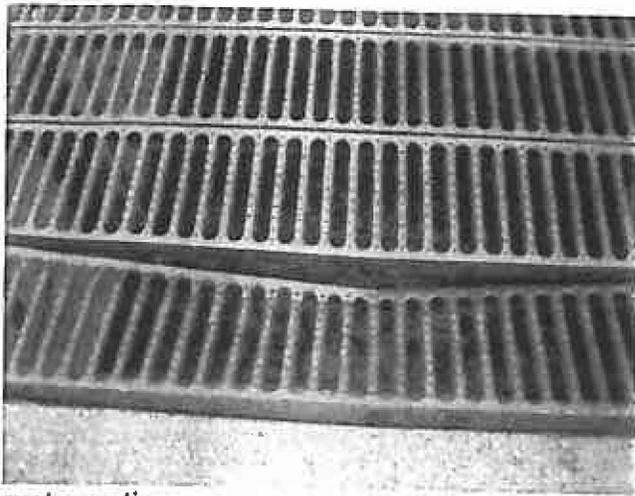


Tomás Parry
Environmental Engineer
Division of Surface Water

TP/mt

enclosures: Operator of Record Notification Form and photos

cc: Richard Curl, Trumbull County Health Department
Ed and Brian Mosko, Valley Environmental Lab, Inc.



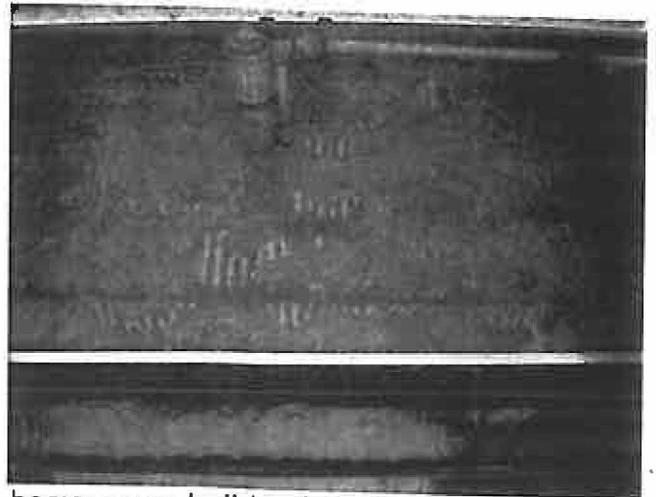
rusty grating



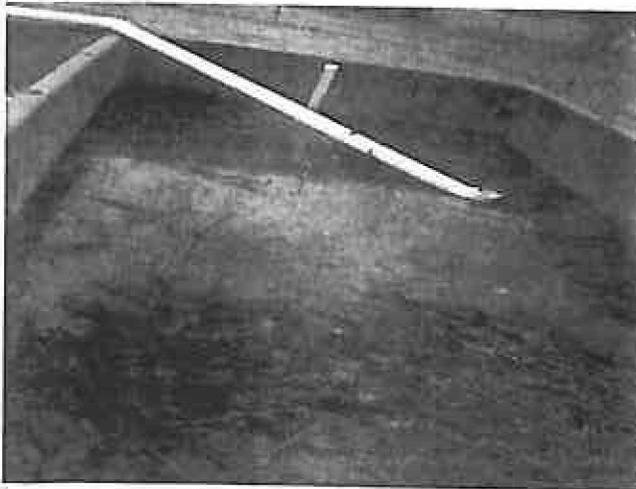
backup aeration motor out of service



low spot in fence



heavy scum buildup in north clarifier



heavy vegetation and illegal overflow pipe