



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 29, 2011

RE: TRUMBULL COUNTY
VILLAGE OF LORDSTOWN
IMPERIAL MOBILE HOME PARK
NPDES PERMIT NO. OH0107450
OHIO EPA PERMIT NO. 3PV00062

Mr. Ronald Radka, President
Imperial Trailer Park, Inc.
3293 Ellsworth Bailey Road
Warren, OH 44481

Dear Mr. Radka:

Ohio EPA (OEPA) conducted a compliance evaluation inspection (CEI) of the above-referenced facility on October 12, 2011. Mr. Tom Cowie represented Imperial MHP and the undersigned represented OEPA. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

Existing treatment components consist of preliminary treatment (trash traps), 75,000-gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, and UV disinfection. Sludge handling consists of an aerated sludge holding tank and sludge drying beds. Treated effluent is discharged to an unnamed tributary of Mud Creek.

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

1. The general operation and maintenance of the treatment plant was found to be satisfactory. The final effluent was clear, and was causing no immediately observable, adverse impacts to the receiving stream.
2. We understand that sanitary sewers have been constructed nearby, and that there is ongoing litigation to determine ownership of the sewers. Once this issue is resolved, Imperial MHP will be required to connect to these sewers if it's determined that they are available and accessible.
3. Please ensure that bound and numbered log books are used to record all operation and maintenance activities that are performed at the treatment plant. Operation and maintenance personnel shall include their arrival and departure times, their initials, and a description of the work performed.
4. If samples are being refrigerated on site, then a thermometer needs to be kept in the refrigerator to ensure samples are maintained at a proper temperature. Samples should be stored within a temperature range of 0° C - 6° C.
5. Buildup was observed on the clarifier walls.

6. Foaming was observed in the aeration tanks.
7. A fence or other type of suitable enclosure must be installed to prevent unauthorized access to the sand filters.
8. All sand filters must be weeded, cleaned, raked, and leveled on a regular basis to ensure proper dissipation of wastewater.
9. Solids accumulation was observed on the surface of the sand filters.
10. Please ensure that the drainage pipe in the disinfection chamber is permanently capped.
11. Part II, L of the facility's NPDES permit, which went effective on September 1, 2007, requires that an outfall sign be erected no later than four months after the effective date of this permit. During the inspection, no such sign was noted.
12. Please be aware that the current NPDES permit expires on August 31, 2012. Pursuant to Ohio Administrative Code 3745-33-04, permit renewal applications must be submitted at least 180 days in advance of the expiration date. This means Imperial MHP must submit its renewal application to this office by no later than March 5, 2012.

A review of the facility's monthly operating reports received by Ohio EPA for the period May 2007 – October 2011 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2007	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2	3.89	5/1/2007
May 2007	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3	5.35	5/1/2007
September 2007	001	31616	Fecal Coliform	30D Conc	1000	1610.	9/1/2007
May 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.125	5/1/2008
May 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.4	5/1/2008
June 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	5.125	6/1/2008
June 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	6.8	6/1/2008
June 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.45	6/15/2008
September 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.75	9/1/2008
September 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	4.1	9/15/2008
January 2009	001	00530	Total Suspended Solids	30D Conc	12	14.3333	1/1/2009
January 2009	001	00530	Total Suspended Solids	7D Conc	18	26.	1/15/2009
May 2009	001	00530	Total Suspended Solids	30D Conc	12	21.5	5/1/2009
May 2009	001	00530	Total Suspended Solids	7D Conc	18	20.	5/1/2009
May 2009	001	00530	Total Suspended Solids	7D Conc	18	41.	5/8/2009
June 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.02	6/1/2009
June 2009	001	00530	Total Suspended Solids	7D Conc	18	20.	6/8/2009

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June 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.6	6/15/2009
July 2009	001	00530	Total Suspended Solids	30D Conc	12	17.	7/1/2009
July 2009	001	00530	Total Suspended Solids	7D Conc	18	19.	7/1/2009
July 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	5.975	7/1/2009
July 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	5.7	7/1/2009
July 2009	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.57	.59439	7/1/2009
July 2009	001	80082	CBOD 5 day	7D Conc	15	26.	7/1/2009
July 2009	001	00530	Total Suspended Solids	7D Conc	18	25.	7/8/2009
July 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	6.25	7/15/2009
August 2009	001	00530	Total Suspended Solids	30D Conc	12	14.	8/1/2009
August 2009	001	00530	Total Suspended Solids	7D Conc	18	32.	8/1/2009
August 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	4.625	8/1/2009
August 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	6.4	8/15/2009
February 2010	001	00400	pH	1D Conc	6.5	6.3	2/24/2010
July 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.675	7/1/2010
July 2010	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	5.05	7/1/2010
September 2010	001	31616	Fecal Coliform	30D Conc	1000	6160.	9/1/2010
September 2010	001	31616	Fecal Coliform	7D Conc	2000	6160.	9/1/2010
October 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.225	10/1/2010
October 2010	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	4.05	10/15/2010
November 2010	001	00530	Total Suspended Solids	7D Conc	18	19.	11/8/2010
April 2011	001	00530	Total Suspended Solids	7D Conc	18	24.	4/22/2011
May 2011	001	00530	Total Suspended Solids	7D Conc	18	23.	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	5.58	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	8.5	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.57	.97513	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.85	1.51532	5/1/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Reported Value	Violation Date
3PV00062*ED	February 2008	001	00530	Total Suspended Solids	AF	2/6/2008
3PV00062*ED	February 2008	001	00610	Nitrogen, Ammonia (NH3	AF	2/6/2008
3PV00062*ED	February 2008	001	00610	Nitrogen, Ammonia (NH3	AF	2/6/2008
3PV00062*ED	February 2008	001	00610	Nitrogen, Ammonia (NH3	AF	2/6/2008
3PV00062*ED	February 2008	001	00610	Nitrogen, Ammonia (NH3	AF	2/6/2008
3PV00062*ED	February 2008	001	80082	CBOD 5 day	AF	2/6/2008
3PV00062*ED	February 2008	001	00400	pH	AF	2/6/2008
3PV00062*ED	February 2008	001	00300	Dissolved Oxygen	AF	2/6/2008
3PV00062*ED	January 2009	001	00530	Total Suspended Solids	AF	1/28/2009
3PV00062*ED	January 2009	001	80082	CBOD 5 day	AF	1/28/2009
3PV00062*ED	January 2009	001	00400	pH	AF	1/28/2009
3PV00062*ED	January 2009	001	00300	Dissolved Oxygen	AF	1/28/2009

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Please inform this office, in writing, within 14 days' receipt of this notification, as to the actions taken or proposed to address the above-referenced violations and/or deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. 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) 963-1200.

Respectfully,

A handwritten signature in cursive script that reads "Tomás Parry".

Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

cc: Dwane Stull

Attachments: Photographs



