



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 12, 2012

RE: GENEVA MOBILE HOME PARK  
OHIO EPA PERMIT 3PV00117  
GENEVA TWP, ASHTABULA COUNTY  
COMPLIANCE INSPECTION EVALUATION

Estate of Rudolf W. Herzog,  
dba Geneva Trailer Park  
Mr. William R. Herzog, Executor  
P.O. Box 2300  
Ashtabula, Ohio 44005-2300

**NOTICE OF VIOLATION**

Dear Mr. Herzog:

On April 11, 2012, a site inspection was conducted at the above referenced facility at 4546 North Ridge Road (U.S. Route 20), Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Marlene Knopsnider represented Lewis Wastewater Services, contract operator, during the inspection. Mr. Gregorio Martinez, park manager, was unavailable for the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on May 12, 2011.

The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge is removed from an aerated holding tank when needed to another publicly owned treatment works (POTW). The facility discharges to an unnamed tributary to Indian Creek adjacent to the west side of the facility. No backup power or alarms are provided to the facility.

**Observations and Notations**

The following observations and notations were made during the inspection:

1. The plant is operated by Marlene Knopsnider and Dustin Lewis of Lewis Wastewater Services on behalf of the Estate of Rudolf W. Herzog, dba Geneva Trailer Park.
2. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. The log book is compliant with Ohio Administrative Code (OAC) 3745-7-09.
3. The overall condition of the treatment plant during this inspection was satisfactory.
4. The trash trap was functioning properly during the inspection. Collected trash was containerized for disposal at a solid waste landfill.
5. The content of the aeration tank had a medium brown color, earthy odor, and good mixing. Sludge returns were a medium brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
6. The sludge holding tank was noted as cleaned and operating properly at the time of the inspection, and appeared to have been emptied since the last inspection.

7. The surface of the clarifier was clear and both the effluent weir and skimmer were functioning properly at the time of this inspection. Effluent weirs and channels need cleaned. This should be performed weekly.
8. Surface sand filter doing pumps cycled and were found in operating condition. The alarms could not be tested and their operating condition is unknown.
9. Surface sand filters were clean and operable. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged. A significant amount of raked sludge was noted around the perimeter of each bed. This should be removed and containerized for off-site disposal.
10. The chlorination tank was noted as needing cleaned. The tank will be cleaned and will be stocked the appropriate chemicals prior to commencement of the disinfection season. The dechlorination system installed to the west of the chlorine contact tank should also be stocked with the appropriate chemicals prior to commencement of the disinfection season.
11. Ohio EPA notes that Mr. Martinez is the park manager and maintains the facility in conjunction with Mr. Locy and Mr. Dustin Lewis and Ms. Marlene Knopsnider of Clean Stream, Inc.
12. Samples are collected by Lewis Wastewater Services, who perform on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity. Mr. Martinez also records daily readings of odor, color, and turbidity.
13. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
14. Clean Streams submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of Geneva Trailer Park.

#### **NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2011 through March 1, 2012 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit:

#### **Limit Violations**

No effluent limit violations are noted for the time period reviewed.

#### **Reporting Violations**

No reporting code or reporting frequency violations are noted for the time period reviewed.

#### **Other NPDES Violations**

The following additional NPDES permit violations are noted:

**Failure to Submit Annual Sludge Report:** Ohio EPA notes that Part II, Item K of your NPDES permit requires you to submit a report no later than January 31<sup>st</sup> summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report is required even if no sludge was removed the previous calendar year. Ohio EPA's

files reflect that Geneva Trailer Park has never submitted this report since the NPDES permit was issued in 2005. Please submit the report to Chris Moody of this office as prescribed by your NPDES permit.

Compliance Schedule

Ohio EPA notes the following regarding your compliance schedule contained within your NPDES permit:

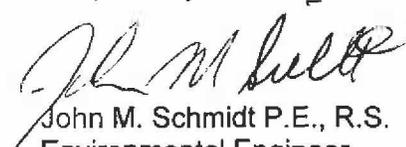
Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
04/1/2011	3/31/2016	4/1/2012	4/03/2012	95999	Other	E Coli Status Report
4/1/2011	3/31/2016	4/1/2012	N/A	-----	Other	E Coli PTI if Needed
4/1/2011	3/31/2016	10/1/2012	Not Complete	05699	Other	Achieve Final Limits

From examination of the data submitted through the eDMR system, it appears that the E Coli values submitted for May 2011, July 2011, and September 2011 exceed the E Coli limits that will become effective on May 1, 2012. From discussions with your contract operator, it appears that on at least one occasion the chlorination tablets were not kept stocked in the tablet chlorinator. It is imperative that chlorination and dechlorination tablets be maintained in the treatment process. If Geneva Trailer Park is unable to meet its disinfection requirements by October 1, 2012, it will be in violation with the requirement to submit a permit-to-install (PTI) for improvements to the disinfection system to ensure that compliance limits will be met as noted above.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions that will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1175.

Respectfully,

  
John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

cc: Mr. Michael B. Locy, A & C Mobile Homes Inc  
Mr. Dustin Lewis, Clear Stream, Inc.  
Marlene Knopsnider

File: Semipublic/Ashtabula/Geneva Twp/Geneva Trailer Park (3PV00117)