



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 2, 2012

RE: TRUMBULL COUNTY
HUBBARD TOWNSHIP
STONEBROOKE VILLAGE MHP
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:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on June 26, 2012. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The existing treatment components consist of a trash trap, flow equalization basin, 30,000 gpd extended aeration package plant, final settling tank, slow surface sand filters, and chlorination/dechlorination. Sludge handling consists of an aerated sludge holding tank and sludge drying beds. Treated effluent is discharged to a tributary of Crab Creek.

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

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment components appeared to be in working order. The final effluent was clear, and was not causing any immediately noticeable, adverse impacts to the receiving stream.
2. Floating solids were observed in the clarifier.
3. Ponded water was observed in the active sand filter.
4. Part II, K of the facility's NPDES permit requires that an outfall marker be erected no later than 4 months from the effective date of this permit. No such marker was noted at Outfall 001. Refer to the referenced portion of the NPDES permit for instructions on the content, configuration, and sizing of the sign.

A review of the facility's electronic discharge monitoring reports (eDMRs) received by Ohio EPA for the period September 2009 through May 2012 indicated 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 |
|------------------|---------|----------------|------------------------|------------------|----------|----------|----------------|
| September 2009 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 09/01/2009 |
| September 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 09/01/2009 |
| September 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 09/01/2009 |
| September 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 09/01/2009 |
| September 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 09/01/2009 |
| October 2009 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 10/01/2009 |
| October 2009 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 10/02/2009 |
| October 2009 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 10/05/2009 |
| October 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 10/01/2009 |
| October 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 10/02/2009 |
| October 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 10/05/2009 |
| October 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 10/01/2009 |
| October 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 10/02/2009 |
| October 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 10/05/2009 |
| October 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 10/01/2009 |
| October 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 10/02/2009 |
| October 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 10/05/2009 |
| October 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 10/01/2009 |
| October 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 10/02/2009 |
| October 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 10/05/2009 |
| November 2009 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 11/02/2009 |
| November 2009 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 11/11/2009 |
| November 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 11/02/2009 |
| November 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 11/09/2009 |
| November 2009 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 11/11/2009 |
| November 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 11/02/2009 |
| November 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 11/09/2009 |
| November 2009 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 11/11/2009 |
| November 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 11/02/2009 |
| November 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 11/09/2009 |

| | | | | | | | |
|----------------|-----|-------|------------------------|-------|---|---|------------|
| November 2009 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 11/11/2009 |
| April 2010 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 04/21/2010 |
| April 2010 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 04/21/2010 |
| April 2010 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 04/21/2010 |
| April 2010 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 04/21/2010 |
| September 2010 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 09/15/2010 |
| September 2010 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 09/15/2010 |
| September 2010 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 09/15/2010 |
| September 2010 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 09/15/2010 |
| November 2010 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 11/01/2010 |
| November 2010 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 11/01/2010 |
| November 2010 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 11/01/2010 |
| November 2010 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 11/01/2010 |
| December 2010 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 12/08/2010 |
| December 2010 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 12/08/2010 |
| December 2010 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 12/08/2010 |
| June 2011 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 06/01/2011 |
| June 2011 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 06/01/2011 |
| June 2011 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 06/01/2011 |
| June 2011 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 06/01/2011 |
| June 2011 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/01/2011 |
| August 2011 | 001 | 00010 | Water Temperature | 1/Day | 1 | 0 | 08/01/2011 |
| August 2011 | 001 | 00083 | Color, Severity | 1/Day | 1 | 0 | 08/01/2011 |
| August 2011 | 001 | 01330 | Odor, Severity | 1/Day | 1 | 0 | 08/01/2011 |
| August 2011 | 001 | 01350 | Turbidity, Severity | 1/Day | 1 | 0 | 08/01/2011 |
| August 2011 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 08/01/2011 |

In addition to the above, our review of the facility's data reporting procedures noted that Mr. Edward Mosko of Valley Environmental Laboratories, Inc. has been submitting the facility's eDMR data. Pursuant to Part III, Item 28 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 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

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A person is a duly authorized representative 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,

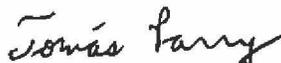
(3) The written authorization is submitted to the Director.

Based on the requirements outlined in 40 CFR 122.22, Mr. Mosko may not submit eDMR data on behalf of Stoneybrook Village MHP.

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 14 days' receipt of this notification, as to the actions that have been 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.

Should you have any questions or comments regarding this letter, please contact this office at 330-963-1120.

Respectfully,



Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP:bo

attachments: photographs

pc: Valley Environmental Laboratories, Inc.

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