



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

December 5, 2012

RE: MAHONING COUNTY
COITSVILLE TWP
STATELINE MHP
NPDES PERMIT NO. 3PV00088
2013 CEI/NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Dan Kylie, Owner
Stateline MHP
301 Clemantis Street
West Palm Beach, FL 33401

Mr. Kylie:

On November 20, 2012, this writer inspected the wastewater treatment system for the Stateline Mobile Home Park. The intent of the inspection was to monitor the condition of the treatment system and to evaluate compliance with the National Pollutant Discharge Elimination System (NPDES) Permit.

Following are observations made at the time of the inspection:

- 1) The treatment system includes no equalization tank to equalize the influent flow of water. The absence of an equalization tank means that the system may be hydraulically overloaded during precipitation events or during periods of peak flow rates, which are usually experienced twice per day. Hydraulic surcharging of the treatment system has been identified in the past as a cause for noncompliance.
- 2) The treatment system includes only one blower to supply all the necessary air to the treatment system. A single blower is unacceptable. Since a continuous air supply to the treatment system is critical for proper treatment of the wastewater, a second blower is necessary in the event the first blower malfunctions.
- 3) The content of the aeration tank had good color and mixing. The color of the liquid in the tank was chocolate brown.
- 4) The clarifier remains in need of replacement. The weir has no v-notched plates attached to the sides of the effluent trough, and the clarifier appears to be undersized. The clarifier continues to be unsatisfactory.
- 5) There is no disinfection system at the plant. The absence of a properly designed disinfection system is the cause for violations of the bacteria limit in the expired NPDES Permit.
- 6) No sand filters are present at the plant to provide tertiary treatment. The absence of tertiary treatment is the cause for violations of the Total Suspended Solids limit in the NPDES Permit.

The plant upgrade previously approved by this office included slow surface sand filters to be installed for tertiary treatment of the wastewater prior to discharge.

The plant is in need of upgrading or replacement. In April 2009, a plant upgrade was approved but never implemented following the declaration of bankruptcy by the owner at the time. Be advised that the system must be upgraded to meet current design criteria established by Ohio EPA and to consistently comply with discharge permit limits. Current design standards can be found at the following web address: <http://epa.ohio.gov/portals/35/documents/greenbook.pdf>.

Any discharge of wastewater to Ohio streams requires that the source of wastewater hold an effective NPDES Permit. This is a requirement of the Federal Clean Water Act and Ohio Revised Code (R.C.) 6111.04. The Stateline Mobile Home Park does not currently hold an effective NPDES Permit and is therefore, in violation of the Federal Clean Water Act and R.C. 6111.04. An application for the permit was submitted by Mr. Arthur Menaldi on August 30, 2012; however, the application was not processed prior to the recent transfer of ownership. As the current owner of the facility, you must submit an updated application with current information regarding ownership of the facility. To update the application, you must submit a completed Form 1. Form 1 can be found at the following web address:

http://epa.ohio.gov/portals/35/permits/NPDESForm1_2_06_fis.pdf

A copy of Form 1 is enclosed with this letter. It must be completed and returned to this office no later than December 31, 2012. Failure to do so will cause this office to initiate enforcement action against the Stateline Mobile Home Park.

Once the updated application form is received at this office, the NPDES Permit will be processed and issued to the Stateline Mobile Home Park. The permit will include a schedule to upgrade the treatment system. The schedule will include a date to submit a Permit to Install application along with detailed plans for upgrading the system. The permit to Install is a requirement of Ohio Revised Code (R.C.) 6111.44 and Ohio Administrative Code (OAC) 3745-42. All information necessary to complete the Permit-to-Install (PTI) application is provided at <http://epa.ohio.gov/dsw/pti/index.aspx>.

In addition to a date for submitting the PTI application, the NPDES Permit will include dates to initiate and complete construction of the upgrades. A final date for compliance will also be included in the permit. The compliance schedule to be included in the NPDES Permit must be followed or this office will initiate enforcement action against the Stateline Mobile Home Park.

Compliance Review

As part of this inspection, the compliance record for the Stateline MHP was reviewed. The period of review was November 2011 through October 2012. Following is a list of limit violations identified during the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2011	Total Suspended Solids	30D Conc	12.0	15.5	11/1/2011
December 2011	Total Suspended Solids	30D Conc	12.0	13.5	12/1/2011
December 2011	Total Suspended Solids	30D Qty	0.44	.45988	12/1/2011
January 2012	Total Suspended Solids	30D Qty	0.44	.45042	1/1/2012
February 2012	Total Suspended Solids	30D Conc	12.0	21.	2/1/2012

STATELINE MHP
 DECEMBER 5, 2012
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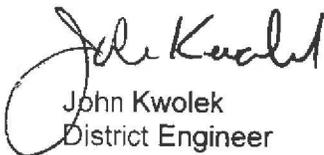
February 2012	Total Suspended Solids	30D Qty	0.44	87434	2/1/2012
February 2012	CBOD 5 day	30D Conc	10	10.1	2/1/2012
February 2012	CBOD 5 day	30D Qty	0.37	.42051	2/1/2012
February 2012	Total Suspended Solids	7D Conc	18.0	21	2/8/2012
February 2012	Total Suspended Solids	7D Qty	0.67	87434	2/8/2012
March 2012	Total Suspended Solids	30D Conc	12.0	36	3/1/2012
March 2012	Total Suspended Solids	30D Qty	0.44	1.90764	3/1/2012
March 2012	Total Suspended Solids	7D Conc	18.0	36	3/15/2012
March 2012	Total Suspended Solids	7D Qty	0.67	1.90764	3/15/2012
May 2012	Nitrogen, Ammonia	30D Conc	2.0	7.65	5/1/2012
May 2012	Nitrogen, Ammonia	30D Qty	0.07	.11582	5/1/2012
May 2012	Fecal Coliform	30D Conc	1000	7000.	5/1/2012
May 2012	Dissolved Oxygen	1D Conc	6.0	5.	5/1/2012
May 2012	Fecal Coliform	7D Conc	2000	7000.	5/8/2012
May 2012	Chlorine, Total Residu	1D Conc	0.019	.19	5/8/2012
May 2012	Dissolved Oxygen	1D Conc	6.0	4.	5/8/2012
May 2012	Nitrogen, Ammonia	7D Conc	3.0	7.65	5/15/2012
May 2012	Nitrogen, Ammonia	7D Qty	0.11	.11582	5/15/2012
May 2012	Chlorine, Total Residu	1D Conc	0.019	.11	5/15/2012
May 2012	Dissolved Oxygen	1D Conc	6.0	2.22	5/15/2012
May 2012	Chlorine, Total Residu	1D Conc	0.019	.16	5/22/2012
May 2012	Dissolved Oxygen	1D Conc	6.0	4.	5/22/2012
May 2012	Chlorine, Total Residu	1D Conc	0.019	.16	5/29/2012
May 2012	Dissolved Oxygen	1D Conc	6.0	5.	5/29/2012
June 2012	Nitrogen, Ammonia	30D Conc	2.0	2.92	6/1/2012
June 2012	Chlorine, Total Residu	1D Conc	0.019	.1	6/4/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	5.	6/4/2012
June 2012	Chlorine, Total Residu	1D Conc	0.019	.08	6/12/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	4.	6/12/2012
June 2012	Chlorine, Total Residu	1D Conc	0.019	.07	6/13/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	4.04	6/13/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	5.	6/18/2012
June 2012	Dissolved Oxygen	1D Conc	6.0	5.	6/25/2012
July 2012	Fecal Coliform	30D Conc	1000	12000.	7/1/2012
July 2012	Fecal Coliform	7D Conc	2000	12000.	7/8/2012
July 2012	Dissolved Oxygen	1D Conc	6.0	5.85	7/19/2012
August 2012	Fecal Coliform	30D Conc	1000	12000.	8/1/2012
August 2012	Chlorine, Total Residu	1D Conc	0.019	.09	8/9/2012
August 2012	Chlorine, Total Residu	1D Conc	0.019	.12	8/13/2012
August 2012	Dissolved Oxygen	1D Conc	6.0	5.	8/13/2012
August 2012	Fecal Coliform	7D Conc	2000	12000.	8/15/2012
August 2012	Chlorine, Total Residu	1D Conc	0.019	.08	8/20/2012
August 2012	Dissolved Oxygen	1D Conc	6.0	4.	8/20/2012
August 2012	Chlorine, Total Residu	1D Conc	0.019	.08	8/27/2012
August 2012	Dissolved Oxygen	1D Conc	6.0	4.	8/27/2012
September 2012	Chlorine, Total Residu	1D Conc	0.019	.8	9/7/2012
September 2012	Dissolved Oxygen	1D Conc	6.0	4.	9/7/2012
September 2012	Chlorine, Total Residu	1D Conc	0.019	.12	9/14/2012
September 2012	Dissolved Oxygen	1D Conc	6.0	5.	9/14/2012

September 2012	Chlorine, Total Residu	1D Conc	0.019	.08	9/15/2012
September 2012	Chlorine, Total Residu	1D Conc	0.019	.8	9/24/2012
September 2012	Dissolved Oxygen	1D Conc	6.0	4.	9/24/2012
October 2012	Chlorine, Total Residu	1D Conc	0.019	.05	10/4/2012
October 2012	Dissolved Oxygen	1D Conc	6.0	1.97	10/4/2012
October 2012	Chlorine, Total Residu	1D Conc	0.019	.09	10/8/2012
October 2012	Chlorine, Total Residu	1D Conc	0.019	.08	10/17/2012
October 2012	Chlorine, Total Residu	1D Conc	0.019	.07	10/22/2012
October 2012	Dissolved Oxygen	1D Conc	6.0	5.	10/22/2012
October 2012	Chlorine, Total Residu	1D Conc	0.019	.09	10/29/2012

Be advised that the Stateline MHP is in Significant Noncompliance (SNC) with the NPDES Permit. Such violations are subject to enforcement action by the State of Ohio.

You may contact this office at (330) 963-1251 to discuss any questions you may have regarding this inspection report. You may also contact this writer at the following e-mail address: john.kwolek@epa.state.oh.us.

Respectfully,


 John Kwolek
 District Engineer
 Division of Surface Water

JK/cs

Enclosures (1)

cc. Dave Beaver, Mahoning County Department of Health
 John Hallas, Mahoning County Department of Health

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature X  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:	B. Received by (Printed Name)	C. Date of Delivery 12-12-12
Mr. Dan Kylie, Owner Stateline MHP 301 Clematis Street West Palm Beach, FL 33401	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label)	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
PS Form 3811, February 2004	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	7012 1010 0000 94675793 DSW 12-6-12 102595-02-M-1540