



John R. Kasich, Governor

Mary Taylor, Lt. Governor

February 13, 2013
Scott V. Nally, Director

RE: COUNTRY SQUIRE MHP
OEPA PERMIT # 3PV00130
COMPLIANCE EVALUATION INSPECTION
S.R. 62 AND KNOX SCHOOL ROAD
KNOX TOWNSHIP
COLUMBIANA COUNTY

NOTICE OF VIOLATION

Mr. Bob Greenwald
Country Squire MHP
32125 Solon Rd.
Solon, OH 44095

Dear Mr. Greenwald:

On February 6, 2013, this writer conducted a compliance evaluation inspection of the Country Squire MHP wastewater treatment plant (WWTP). This correspondence is being provided as an update of the park's current status since you are coordinating with the bankruptcy courts and the sale of the property to Mr. Krafft. The WWTP is currently producing a marginal effluent and there are many noncompliance issues with the Ohio Revised Code. The Country Squire MHP is considered to be in significant noncompliance.

The following is a summary of our observations:

- 1) The trash trap was not inspected; however, there appeared to excavation going on in this area.
- 2) The aeration tank had a good brown color. The plant was getting a good roll across the tank from the diffusers. The effluent had some minor solids going over the weir. The sludge return appeared to be operating at a high rate which will inhibit good settling of the floc. A settleability test should be done regularly to adjust the return rates of the mixed liquor. This facility did not have any filters or chlorination/dechlorination facilities.
- 3) Our records indicate the facility was originally approved on June 29, 1967, for a maximum of 58 trailer spaces at a design flow of 150 gpd per mobile home. The current licenses issued by the Columbiana Health Department states that 66 park lots are occupied. At our current design flow of 300 gpd per mobile home the expected design flow would be 19,800 gpd. The existing facilities (a 10,000-gpd Topco WWTP) do not meet our current design criteria. Mr. Krafft's Engineer has indicated the design of the new plant will be 20,000 gpd.
- 4) The treatment plant discharged to the creek on the south side of the property according to the original approval. The final effluent discharges to a small unnamed tributary of the Mahoning River.

- 5) The National Pollutant Discharge Elimination System (NPDES) permit for this treatment plant was effective on August 1, 2009.
- 6) The monthly monitoring reports for this facility were reviewed for the period of January 2011, through December 2012. The violations are attached to this letter.

Non-Compliance Issues

The mobile home park is considered to be in significant noncompliance for the following violations of its current NPDES permit:

- 1) Part I, A, Final Outfall: The facility is violating the final effluent limits at the final outfall of the WWTP. The violations are attached.
- 2) Part I, C, Schedule of Compliance: Detail Plans for improvements to comply with the final effluent limits were to have been submitted by February 1, 2010. To date, this office has not received a permit to install for the necessary improvements. Construction of the new facilities was to have been completed by February 1, 2011. The improvements have not been installed.
- 3) Part I, F, Schedule of Compliance: The WWTP was to achieved compliance with final effluent limits by March 1, 2011. To date the necessary improvements have not been installed and the facility is not in compliance with its final table effluent limits.

It is our experience the existing facilities will not meet the above discharge criteria. The following treatment structures must be added to the existing WWTP in order to discharge adequately treated wastewater and to upgrade the treatment system to current standards:

- a) Tertiary sand filters to filter any solids prior to discharge must be added to the system. The sand filters will enable the system to meet the solids limit that is established in the NPDES permit. A dosing chamber with dual alternating submersible pumps must be installed before the filters to properly dose them.
- b) A chlorination/dechlorination system to disinfect the wastewater prior to discharge must be added to the treatment system.
- c) A second, redundant air blower must be added to the treatment system. The existing blower and the new blower must be periodically alternated to ensure their operation.
- d) A flow meter must be added in order to report actual flow from the treatment system. The flow meter must be properly sized. As an alternative, dosing pumps used to dose the sand filters may be fitted with hour meters to measure flow through the treatment system.
- e) A sludge holding tank will be necessary to store sludge removed from the clarifier until it can be hauled away for proper disposal. It is necessary to maintain a proper solids balance within the aeration tank and clarifier for proper treatment of the wastewater.

- f) A flow equalization tank will be necessary to minimize peak flows at the WWTP due to leaking sewers and storm events. Flow equalization will help reduce peak flows that can result in plant upsets.
- g) Mr. Krafft's engineer has indicated a new system will replace the old one. An engineering evaluation of the existing trash trap and extended aeration WWTP will be necessary to insure they are adequate to handle the park's existing capacity for mobile homes if they are intended for future use at some later date. The new plant must be evaluated for compliance with "Sewage: Collection, Treatment & Disposal", the Agency design document for small wastewater treatment systems.

Schedule

Mr. Krafft must submit a Permit-to-Install for the upgraded facilities within 45 days of the receipt of this letter. The permit modification must also accompany the Permit to Install. A realistic schedule for construction of the new facilities must be included. The NPDES permit transfer was processed by this office on February 13, 2013. The transferred permit should be delivered to Mr. Krafft in the next few weeks.

Should you have any comments or questions, feel free to contact me at (330) 963-1193.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/cs

cc: Lori J. Barnes, R.S., Columbiana County Health Department
Mr. Wilbur Krafft, Owner, Country Squire MHP
Kathleen R. Bender, P.E., KRB Engineering

ec: Dean Stoll, P.E., Enforcement Coordinator, Ohio EPA, DSW, NEDO

File: Semipublic/Columbiana County/Knox Township/Country Squire MHP

Country Squire MHP effluent violations: January 2012 - December 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00130*AD	January 2012	Nitrogen, Ammonia (NH3)	30D Conc	3	28.5	1/1/2012
3PV00130*AD	January 2012	Nitrogen, Ammonia (NH3)	7D Conc	4.5	28.5	1/1/2012
3PV00130*AD	January 2012	Nitrogen, Ammonia (NH3)	30D Qty	0.23	1.07873	1/1/2012
3PV00130*AD	January 2012	Nitrogen, Ammonia (NH3)	7D Qty	0.34	1.07873	1/1/2012
3PV00130*AD	February 2012	Total Suspended Solids	30D Conc	12	18.5	2/1/2012
3PV00130*AD	February 2012	Nitrogen, Ammonia (NH3)	30D Conc	3	10.8	2/1/2012
3PV00130*AD	February 2012	Nitrogen, Ammonia (NH3)	30D Qty	0.23	.40878	2/1/2012
3PV00130*AD	February 2012	CBOD 5 day	30D Conc	10	25.3	2/1/2012
3PV00130*AD	February 2012	CBOD 5 day	30D Qty	0.8	.95761	2/1/2012
3PV00130*AD	February 2012	Total Suspended Solids	7D Conc	18	18.5	2/15/2012
3PV00130*AD	February 2012	Nitrogen, Ammonia (NH3)	7D Conc	4.5	10.8	2/15/2012
3PV00130*AD	February 2012	Nitrogen, Ammonia (NH3)	7D Qty	0.34	.40878	2/15/2012
3PV00130*AD	February 2012	CBOD 5 day	7D Conc	15	25.3	2/15/2012
3PV00130*AD	February 2012	Dissolved Oxygen	1D Conc	6.0	5.8	2/15/2012
3PV00130*AD	March 2012	Total Suspended Solids	30D Conc	12	40.	3/1/2012
3PV00130*AD	March 2012	Total Suspended Solids	30D Qty	0.9	1.514	3/1/2012
3PV00130*AD	March 2012	Nitrogen, Ammonia (NH3)	30D Conc	3	14.8	3/1/2012
3PV00130*AD	March 2012	Nitrogen, Ammonia (NH3)	30D Qty	0.23	.56018	3/1/2012
3PV00130*AD	March 2012	CBOD 5 day	30D Conc	10	36.	3/1/2012
3PV00130*AD	March 2012	CBOD 5 day	30D Qty	0.8	1.3626	3/1/2012
3PV00130*AD	March 2012	Nitrogen, Ammonia (NH3)	7D Conc	4.5	14.8	3/8/2012
3PV00130*AD	March 2012	Nitrogen, Ammonia (NH3)	7D Qty	0.34	.56018	3/8/2012
3PV00130*AD	March 2012	Dissolved Oxygen	1D Conc	6.0	3.43	3/14/2012
3PV00130*AD	March 2012	Total Suspended Solids	7D Conc	18	40.	3/15/2012
3PV00130*AD	March 2012	Total Suspended Solids	7D Qty	1.35	1.514	3/15/2012
3PV00130*AD	March 2012	CBOD 5 day	7D Conc	15	36.	3/15/2012
3PV00130*AD	March 2012	CBOD 5 day	7D Qty	1.13	1.3626	3/15/2012
3PV00130*AD	April 2012	Nitrogen, Ammonia (NH3)	30D Conc	3	4.81	4/1/2012
3PV00130*AD	April 2012	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.81	4/15/2012
3PV00130*AD	April 2012	Dissolved Oxygen	1D Conc	6.0	1.98	4/16/2012
3PV00130*AD	May 2012	Total Suspended Solids	30D Conc	12	44.	5/1/2012
3PV00130*AD	May 2012	Total Suspended Solids	30D Qty	0.9	1.6654	5/1/2012
3PV00130*AD	May 2012	Fecal Coliform	30D Conc	1000	150000.	5/1/2012
3PV00130*AD	May 2012	Total Suspended Solids	7D Conc	18	44.	5/15/2012
3PV00130*AD	May 2012	Total Suspended Solids	7D Qty	1.35	1.6654	5/15/2012
3PV00130*AD	May 2012	Fecal Coliform	7D Conc	2000	150000.	5/15/2012
3PV00130*AD	May 2012	Chlorine, Total Residu	1D Conc	0.019	.1	5/15/2012
3PV00130*AD	May 2012	Dissolved Oxygen	1D Conc	6.0	2.1	5/15/2012
3PV00130*AD	June 2012	Total Suspended Solids	30D Conc	12	46.7	6/1/2012
3PV00130*AD	June 2012	Total Suspended Solids	30D Qty	0.9	1.7676	6/1/2012
3PV00130*AD	June 2012	Fecal Coliform	30D Conc	1000	4600.	6/1/2012
3PV00130*AD	June 2012	Total Suspended Solids	7D Conc	18	46.7	6/8/2012
3PV00130*AD	June 2012	Total Suspended Solids	7D Qty	1.35	1.7676	6/8/2012

Country Squire MHP effluent violations: January 2012 - December 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00130*AD	June 2012	Fecal Coliform	7D Conc	2000	4600.	6/8/2012
3PV00130*AD	June 2012	Dissolved Oxygen	1D Conc	6.0	3.45	6/12/2012
3PV00130*AD	July 2012	Total Suspended Solids	30D Conc	12	16.	7/1/2012
3PV00130*AD	July 2012	Fecal Coliform	30D Conc	1000	2000.	7/1/2012
3PV00130*AD	July 2012	Fecal Coliform	7D Conc	2000	2000.	7/15/2012
3PV00130*AD	July 2012	Chlorine, Total Residu	1D Conc	0.019	.06	7/18/2012
3PV00130*AD	July 2012	Dissolved Oxygen	1D Conc	6.0	3.48	7/18/2012
3PV00130*AD	August 2012	Total Suspended Solids	30D Conc	12	31.	8/1/2012
3PV00130*AD	August 2012	Total Suspended Solids	30D Qty	0.9	1.17335	8/1/2012
3PV00130*AD	August 2012	Nitrogen, Ammonia (NH3)	30D Conc	1	1.95	8/1/2012
3PV00130*AD	August 2012	Total Suspended Solids	7D Conc	18	31.	8/15/2012
3PV00130*AD	August 2012	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.95	8/15/2012
3PV00130*AD	August 2012	Dissolved Oxygen	1D Conc	6.0	4.8	8/15/2012
3PV00130*AD	September 2012	Total Suspended Solids	30D Conc	12	35.	9/1/2012
3PV00130*AD	September 2012	Total Suspended Solids	30D Qty	0.9	1.32475	9/1/2012
3PV00130*AD	September 2012	Fecal Coliform	30D Conc	1000	53000.	9/1/2012
3PV00130*AD	September 2012	CBOD 5 day	30D Conc	10	10.6	9/1/2012
3PV00130*AD	September 2012	Total Suspended Solids	7D Conc	18	35.	9/8/2012
3PV00130*AD	September 2012	Fecal Coliform	7D Conc	2000	53000.	9/8/2012
3PV00130*AD	September 2012	Dissolved Oxygen	1D Conc	6.0	1.78	9/12/2012
3PV00130*AD	October 2012	Total Suspended Solids	30D Conc	12	20.	10/1/2012
3PV00130*AD	October 2012	CBOD 5 day	30D Conc	10	14.1	10/1/2012
3PV00130*AD	October 2012	Total Suspended Solids	7D Conc	18	20.	10/8/2012
3PV00130*AD	October 2012	Dissolved Oxygen	1D Conc	6.0	1.93	10/8/2012
3PV00130*AD	November 2012	Total Suspended Solids	30D Conc	12	72.	11/1/2012
3PV00130*AD	November 2012	Total Suspended Solids	30D Qty	0.9	2.7252	11/1/2012
3PV00130*AD	November 2012	Nitrogen, Ammonia (NH3)	30D Conc	3	17.8	11/1/2012
3PV00130*AD	November 2012	Nitrogen, Ammonia (NH3)	30D Qty	0.23	.67373	11/1/2012
3PV00130*AD	November 2012	CBOD 5 day	30D Conc	10	37.6	11/1/2012
3PV00130*AD	November 2012	CBOD 5 day	30D Qty	0.8	1.42316	11/1/2012
3PV00130*AD	November 2012	Total Suspended Solids	7D Conc	18	72.	11/15/2012
3PV00130*AD	November 2012	Total Suspended Solids	7D Qty	1.35	2.7252	11/15/2012
3PV00130*AD	November 2012	Nitrogen, Ammonia (NH3)	7D Conc	4.5	17.8	11/15/2012
3PV00130*AD	November 2012	Nitrogen, Ammonia (NH3)	7D Qty	0.34	.67373	11/15/2012
3PV00130*AD	November 2012	CBOD 5 day	7D Conc	15	37.6	11/15/2012
3PV00130*AD	November 2012	CBOD 5 day	7D Qty	1.13	1.42316	11/15/2012
3PV00130*AD	December 2012	Total Suspended Solids	30D Conc	12	28.	12/1/2012
3PV00130*AD	December 2012	Total Suspended Solids	30D Qty	0.9	1.0598	12/1/2012
3PV00130*AD	December 2012	Nitrogen, Ammonia (NH3)	30D Conc	3	7.06	12/1/2012
3PV00130*AD	December 2012	Nitrogen, Ammonia (NH3)	30D Qty	0.23	.26722	12/1/2012
3PV00130*AD	December 2012	CBOD 5 day	30D Conc	10	25.	12/1/2012
3PV00130*AD	December 2012	CBOD 5 day	30D Qty	0.8	.94625	12/1/2012
3PV00130*AD	December 2012	Total Suspended Solids	7D Conc	18	28.	12/15/2012
3PV00130*AD	December 2012	Nitrogen, Ammonia (NH3)	7D Conc	4.5	7.06	12/15/2012
3PV00130*AD	December 2012	CBOD 5 day	7D Conc	15	25.	12/15/2012