



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

April 2, 2013

RE: RUSTIC COVE MOBILE HOME PARK
NPDES PERMIT NO. 3PV00082
GENEVA TOWNSHIP, ASHTABULA CO.
COMPLIANCE EVALUATION INSPECTION

Clarissa and Michael Weiner
Rustic Cove Mobile Home Park
202 East Summit Street
Kent, OH 44240

Dear Mr. and Ms. Weiner:

On March 29, 2013, a site inspection was conducted for the above referenced facility at 3107 South Myers Road, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt and Veronica Newsome of this office. Marlene Knopsnider of Lewis Wastewater Management is the contract operator for this facility and represented Rustic Cove Mobile Home Park during 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 April 11, 2012.

The collection system consists of both a gravity system from the mobile home park. The treatment system consists of flow equalization, a trash trap, extended aeration tanks, clarification, lift station, surface sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management of sludge removal from the aeration system and trash trap when needed to another publicly owned treatment works (POTW). The facility discharges to an unnamed tributary of Cowles Creek located on the north side of the facility. An emergency generator serves as backup power to the facility, and the facility is provided with alarms.

Observations and Notations

Following are observations and notations 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 Clarissa and Michael Weiner, dba Rustic Cove Mobile Home Park. The plant is also seen by the park manager on days when the plant is not seen by Lewis Wastewater Services.
2. Log books, copy of permit, operator contract, and operation and maintenance manuals are maintained at the site and were available for inspection. Separate log books are maintained by the park manager and the certified operator. The information maintained at the site is compliant with Ohio Administrative Code (OAC) 3745-7-09.
3. The overall condition of the treatment plant during this inspection was satisfactory. An access drive, site drainage, and perimeter fencing were installed at the site in the fall of 2012.
4. The trash trap was functioning properly during the inspection. Collected trash was containerized for disposal at a solid waste landfill.

5. The equalization basin blowers and alarms were cycled and found in operating condition, and the basin was found to be sufficiently aerated. The water level in the tanks was very high (about 6 inches from overtopping) and the high water alarm was on.
6. The content of the aeration tank had an earthy odor, medium brown color with good mixing and no foam present. The blowers in operation were cycled and found in operating condition. The blowers running and the plant was receiving good aeration. The color and odor are typical for the aeration tank in proper condition.
7. The surface of the clarifier was clear with some floating scum. Effluent weirs and channels were observed as needing some cleaning. The skimmer was found in operating condition, and the return activated sludge lines were functioning properly. Ms. Knopsnider indicated that effluent channels and weirs are cleaned periodically. These should be cleaned weekly as a part of ongoing maintenance
8. The sand filter dosing pumps were cycled and found in operating condition. Alarms were found in operating condition.
9. Surface sand filters were clean and operable. The north sand bed was in operation at the time of the inspection. 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. The south bed was clean, dry, level, and ready to use. Sand from the sand beds and raked sludge was piled on the ground around the perimeter of the bed. Any sludge and sand removed from the beds must be containerized and managed as a minimum as a solid waste.
10. The chlorine contact tank was observed in need of cleaning. This tank should be scheduled for cleaning prior to commencement of the disinfection season.
11. The final discharge pipe at the unnamed tributary to Cowles Creek was observed as an acceptable visual quality.
12. Northeast Septic was arriving to remove trash from the trash trap and to remove sludge from the sludge holding tank. The volume of sludge removed and the POTW where sludge was hauled must be noted in the log book.
13. Ms. Knopsnider collects samples, performs field analysis (pH, dissolved oxygen, turbidity, color, odor, flow), while Clean Streams performs laboratory analyses and electronically submits the data to the electronic discharge monitoring report (eDMR) system.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2012 through March 1, 2013 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Effluent Limit Violations

No final effluent limit violations were noted for the period reviewed.

Reporting Violations

No reporting frequency violations were noted for the reporting period reviewed, however the following reporting code violation is noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform			AK	7/16/2012

The reporting code indicates that the bacteria sample was too numerous to count. Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. To-date Ohio EPA has not received this notification for this violation, along with measures to ensure that it is not repeated.

Compliance Schedule

Your NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
11/1/2012	10/31/2017	11/1/2013	Incomplete	95999	Construction	E Coli Status Report
11/1/2012	10/31/2017	12/1/2013	Incomplete	-----	Construction	PTI for E Coli if needed
11/1/2012	10/31/2017	6/1/2014	Incomplete	05699	Construction	Achieve Final Limits EC
11/1/2012	10/31/2017	11/1/2014	Incomplete	-----	Construction	Backup Power

As milestones have not yet passed, no further information is needed at this time.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or 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.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



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

JMS/cs

cc: Dustin Lewis, Lewis Wastewater Management
Marlene Knopsnider

File: SP/Ashtabula/Geneva Twp./Rustic Cove Mobile Home Park(3PV00082)