



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

April 3, 2013

RE: TRUMBULL COUNTY  
BRACEVILLE TOWNSHIP  
ARHAVEN ESTATES MHP  
NPDES PERMIT NO. OH0107484  
OHIO EPA PERMIT NO. 3PV00064

Mr. Anthony Casale, President  
Casan Ltd./Arhaven Estates Mobile Home Park  
211 Arhaven Drive  
Newton Falls, Ohio 44444

Mr. Casale:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on March 28, 2013. The inspection was conducted to evaluate the operation and maintenance of the treatment works, and determine the facility's overall compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

The current 17,500-gpd treatment system, designed to serve 100 lots, consists of an aerated flow equalization basin, extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, and chlorination/dechlorination. Waste-activated sludge is stored in an aerated sludge holding tank before it is hauled away for final disposal. Treated effluent is discharged to the Mahoning River.

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 units appeared to be in working condition.
2. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
3. Belt slap was observed in the aeration tank blower motor.
4. Please ensure that the spare blower motor for the aeration tank is made readily available for use.
5. Slight foaming was observed in the aeration tank.
6. Floating sludge was observed in the clarifier.
7. The flow meter did not appear to be functional. Since continuous flow monitoring is required in the NPDES permit, the unit must be immediately serviced or replaced.

8. Heavy sludge deposits were observed in the sand filter as well as a large volume of ponded water. Better settling in the clarifier will ensure better performance in the sand filters.
9. Please install stone riprap around the splash pads in the sand filters.
10. The final section of outfall pipe was cracked, and should be replaced.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period May 2010 – March 2013 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00064*CD	June 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.	6/3/2010
3PV00064*CD	June 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.5	6/17/2010
3PV00064*CD	July 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6	7/5/2010
3PV00064*CD	March 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.8	3/16/2011
3PV00064*CD	April 2011	001	00530	Total Suspended Solids	30D Conc	30	60.	4/1/2011
3PV00064*CD	April 2011	001	80082	CBOD 5 day	30D Conc	25	26.	4/1/2011
3PV00064*CD	April 2011	001	00530	Total Suspended Solids	1D Conc	45	60.	4/4/2011
3PV00064*DD	June 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	3.8	6/8/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3PV00064*CD	September 2010	001	00083	Color, Severity	1/Day	1	0	9/29/2010
3PV00064*CD	September 2010	001	00083	Color, Severity	1/Day	1	0	9/30/2010
3PV00064*CD	September 2010	001	01330	Odor, Severity	1/Day	1	0	9/29/2010
3PV00064*CD	September 2010	001	01330	Odor, Severity	1/Day	1	0	9/30/2010
3PV00064*CD	September 2010	001	01350	Turbidity, Severity	1/Day	1	0	9/29/2010
3PV00064*CD	September 2010	001	01350	Turbidity, Severity	1/Day	1	0	9/30/2010

The eDMR review also indicated that flow values reported for Fridays, Saturdays, and Sundays are consistently identical. Please provide an explanation as to how flow values are determined, particularly on the weekends. Please note that continuous flow monitoring is required in the NPDES permit. Averaging out flow over a weekend would **not** meet this requirement.

In addition to the inspection findings and the eDMR review, you were also required to submit to this office, within six months of the effective date of the NPDES permit, a report evaluating the ability of the existing treatment works to meet the Escherichia coli (E. coli) monitoring limits that became effective twelve months after the effective date of the NPDES permit, which was May 1, 2011. To date, this office has not received the required E. coli status report. While the eDMR review indicated there have been no issues with meeting the E. coli limits, the report is still necessary.

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. Additionally, past or current acts of noncompliance can continue as subjects of future enforcement actions. Please provide to this office, within 14 days' receipt of this notification, written documentation describing the actions that will be taken, or have been taken, to address the above-referenced items. 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/cs

Attachments: Photographs

cc: Valley Environmental Labs, Inc.

