



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

May 15, 2013

RE: TRUMBULL COUNTY
BROOKFIELD TOWNSHIP
WYNGATE MANOR MHP
NPDES PERMIT NO. OH0044857
OHIO EPA PERMIT NO. 3PV00019

Mr. Tim Matthews, President
Superior Mobile Home Sales, Inc.
535 West Third Street
Dover, OH 44622

Mr. Matthews:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on April 25, 2013. The inspection was conducted to evaluate the operation and maintenance (O & M) 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 existing treatment system consists of a trash trap, flow equalization basin, 55,800-gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filters, and UV disinfection. Waste-activated sludge is stored in an aerated sludge holding tank until it is hauled away for final disposal. Treated effluent is discharged to an on-site pond that is tributary to Yankee Run.

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. Please ensure that an access key for the locks to the treatment plant is kept onsite, and made readily available for plant O & M personnel.
3. Several of the tank gratings are quite rusty, and should be replaced.
4. A bound and numbered logbook was not observed at the facility. Please ensure that a bound and numbered logbook is maintained on site, and used to document all operation and maintenance activities at the treatment plant. Plant O & M personnel should log their time in and out, the date, a brief description of the work performed, and their initials.

Subsequent discussions with your operator, Mr. Ed Mosko, indicated that an O & M logbook was being kept onsite until it was destroyed by rodents. Please ensure that a new O & M logbook is maintained on site, and stored in a rodent-proof container if necessary.

5. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
6. One of the backup aeration tank blowers did not appear to be operable. All backup equipment must be available for immediate use should the need arise.
7. Please ensure that gratings are seated properly over the tanks after O & M has been performed on the tanks.
8. Please ensure that all of the aeration tanks are receiving air from the blowers.
9. The sand filter dose tank appears to have a substantial groundwater leak through one of the construction joints. This must be patched and sealed.
10. The sand filters were ponded.
11. One of the sand filter dose arms was not connected to the main dosing lateral from the sand filter distribution box. This must be reconnected.
12. As has been mentioned multiple times in the past, the overflow pipes in the sand filters must be removed.
13. The sand filters do not appear to be getting weeded, raked, and leveled on a regular basis.
14. Sludge deposits were observed on the sand filters, presumably the result of solids washouts through the plant.
15. A strong odor was noted coming from the sludge on the sand filters.
16. The final effluent appeared to be clear, and was not causing any immediately-noticeable, adverse impacts to the receiving water body.
17. Please note that disinfection season is from May 1 – October 31.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period February 2011 – April 2013 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00019*ED	February 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	1.83	3.02985	2/1/2011
3PV00019*ED	February 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.5	2/8/2011
3PV00019*ED	February 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	2.75	5.72481	2/15/2011
3PV00019*ED	March 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6	3/3/2011
3PV00019*ED	March 2011	001	00530	Total Suspended Solids	1D Qty	2.54	3.4822	3/8/2011
3PV00019*ED	March 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	3.5	3/15/2011
3PV00019*ED	April 2011	001	00530	Total Suspended Solids	30D Conc	12	13.5	4/1/2011
3PV00019*ED	April 2011	001	00530	Total Suspended Solids	30D Qty	3.8	4.84385	4/1/2011
3PV00019*ED	April 2011	001	00530	Total Suspended Solids	1D Conc	18	33.	4/5/2011

3PV00019*ED	April 2011	001	00530	Total Solids	Suspended	1D Qty	2.54	11.4912	4/5/2011
3PV00019*ED	April 2011	001	00300	Dissolved Oxygen		1D Conc	5.0	3.8	4/12/2011
3PV00019*ED	April 2011	001	00530	Total Solids	Suspended	1D Qty	2.54	4.67448	4/22/2011
3PV00019*ED	May 2011	001	00530	Total Solids	Suspended	1D Qty	2.54	5.77591	5/3/2011
3PV00019*ED	May 2011	001	00300	Dissolved Oxygen		1D Conc	5.0	3.8	5/10/2011
3PV00019*ED	June 2011	001	00300	Dissolved Oxygen		1D Conc	5.0	4.5	6/1/2011
3PV00019*ED	January 2012	001	00530	Total Solids	Suspended	1D Qty	2.54	3.45192	1/17/2012
3PV00019*FD	April 2013	001	00300	Dissolved Oxygen		1D Conc	6.0	4.3	4/2/2013

The eDMR review also indicated that "AC", or Plant not Discharging, was reported for Total Residual Chlorine for a large portion of 2011. Since the UV disinfection system was installed in May 2011, the AH reporting code (with an explanation) for Total Residual Chlorine should have been used. Please amend the 2011 eDMR submittals for Total Residual Chlorine to reflect the AH reporting code.

This office also noted that AH was reported for a number of missed sample events. Please note that missed sample events are considered to be NPDES permit violations. Effluent samples must be collected, analyzed, and the results reported as required in the NPDES permit.

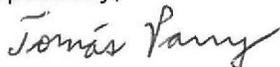
In addition to the inspection findings and the eDMR review, you were also required to submit to this office, within six months of the effective date of the NPDES permit, a report evaluating the ability of the existing treatment works to meet the Escherichia coli (E. coli) monitoring limits that became effective twelve months after the effective date of the NPDES permit, which was April 1, 2012. 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 must still be submitted.

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. Such enforcement actions can result in fines of up to \$10,000 per day of violation.

Please submit to Ohio EPA, within 14 days' receipt of this notification, written documentation describing the course of action that will be taken, or has been taken, to address the items identified in this letter. 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: Photos

cc: Valley Environmental Labs, Inc.



