



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

May 20, 2013

RE: TRUMBULL COUNTY
VIENNA TOWNSHIP
FOUR SEASONS MHP
NPDES PERMIT NO.OH0045101
OHIO EPA PERMIT NO.3PV00025

Mr. William Hagood, Owner
Tri-City Mobile Homes, Inc. dba
Four Seasons MHP
1394 State Route 193
Vienna, Ohio 44473

Mr. Hagood:

Ohio EPA conducted a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on April 30, 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 NPDES permit.

The existing treatment system consists of a trash trap, flow equalization basin, 35,000-gpd extended aeration activated sludge treatment process, final settling tank, upflow clarifiers, slow surface sand filters, and a chlorination/dechlorination contact tank. 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 unnamed tributary of the south branch of Yankee Run.

During the inspection, the following observations and/or deficiencies were noted:

1. The overall operation and maintenance of the treatment works was poor. Although all treatment components appeared to be in working condition, a number of routine O & M items are not being adequately performed.
2. A review of the O & M logbook indicated that your designated plant operator, Mr. Scott Mascioli, appears to be visiting the treatment works once a week. Please note that since the facility is classified as a Class I treatment works, your designated plant operator must be physically present at the site for a minimum of 3 days per week for 1.5 hours total.

Mr. Mascioli indicated that an onsite operator, Mr. Mitch Thompson, handles the day-to-day O & M duties for the plant. However, documentation on file with Ohio EPA indicates that Mr. Thompson only has a Class A wastewater license. While this office has no objections to a Class A operator working on the plant (under the supervision of your designated Class I operator), the treatment works must still be visited by your designated Class I operator for the minimum time requirements.

3. Several of the tank gratings throughout the plant were quite corroded, and should be replaced with new, sturdy gratings.
4. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
5. Thick sludge buildup and vegetative growth were observed in the primary clarifiers and the upward flow clarifiers.
6. The upward flow clarifiers must be routinely cleaned and maintained.
7. Please ensure that proper pipe support is provided for the sand filter dose pipes to ensure that unnecessary stresses are not placed on the flexible rubber gaskets located on the distribution box.
8. As has been documented during past inspections, solids washouts to the sand filters continues to be a problem. Your designated operator, Mr. Scott Mascioli, indicated that solids washouts occur during periods of high flow. Being that the system should be isolated to receiving sanitary flow only, and is also equipped with a flow equalization basin to store high flows, any sources of inflow/infiltration must be determined, and subsequently eliminated.
9. The sand filters are completely plugged, and are overflowing due to the thick sludge deposits passing through the clarifier units.
10. The sand filter walls had holes drilled in the sides to allow for them to drain. Please note that Part III of the NPDES permit contains specific language that: 1) requires that the treatment works be regularly maintained, and 2) prohibits treatment works bypasses. As such, the drainage holes must be immediately patched (permanently), and the sludge cleaned from the sand filters to ensure proper drainage through the sand.

Additionally, better operation of the plant, including but not limited to: 1) regular O & M on all treatment components by your designated operator(s), 2) getting a good settling in the clarifier, and 3) ensuring proper wasting occurs, could help address the solids problem in the sand filters.

11. Please note that disinfection season is from May 1 – October 31.
12. The Ohio EPA permit number (3PV00025) should be referenced on the outfall marker, the spelling error for NPDES must be corrected, and the marker must face the receiving stream (alternatively, a dual-sided marker may be installed).
13. The final effluent being discharged through Outfall 001 appeared to be clear.

A review of the monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period September 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
3PV00025*DD	May 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.03	5/1/2012
3PV00025*DD	July 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.15	7/1/2012
3PV00025*DD	July 2012	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	5.1	7/2/2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3PV00025*DD	November 2011	001	00530	Total Suspended Solids	1/Week	1	0	11/8/2011
3PV00025*DD	November 2011	001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	11/1/2011
3PV00025*DD	November 2011	001	80082	CBOD 5 day	1/Week	1	0	11/8/2011

Please note that failure to properly operate and maintain the treatment works does not constitute justification for bypassing the treatment system. Additionally, a number of the compliance and O & M issues described in this letter have been previously identified in past correspondence from this office. As such, you must immediately develop, and then execute, a plan of action to address all of the items described in this letter. This office will consider initiating enforcement action against the facility should all items in this letter not be immediately addressed.

The facility's current NPDES permit expires on July 31, 2013. This office received a permit renewal application on January 7, 2013. This office anticipates drafting, and then issuing, a new NPDES permit for public notice. This office advises that you read through the draft permit, as a number of changes will be made.

One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. The permittee will also be required to begin monitoring right away for Total Kjeldahl Nitrogen (TKN), Nitrite and Nitrate, Phosphorus, and Total Filterable Residue (TDS). Monitoring requirements for all new parameters will be described in the new permit.

Should you have any comments on the draft permit, you must submit them to Ohio EPA, in writing, within 30 days of the public notice date. Any comments received by Ohio EPA during the 30-day public notice period will be taken into consideration before the draft NPDES permit is issued as a final action.

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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.

Respectfully,

A handwritten signature in cursive script that reads "Tomás Parry".

Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Scott Mascioli



