



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



May 16, 2013

RE: TRUMBULL COUNTY
BAZETTA TOWNSHIP
2917 DURST-COLEBROOK RD
LAKEVIEW MHP
NPDES PERMIT NO. OH0044881
OHIO EPA PERMIT NO. 3PV00020

Jay Plymale, Owner
Lakeview MHP
7437 Birkner Drive
Kent, Ohio 44417

CERTIFIED MAIL

Mr. Plymale:

Ohio EPA conducted a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on April 25, 2013. The inspection was performed 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 existing treatment system consists of a trash trap, 50,000-gpd extended aeration activated sludge treatment process, final settling tank, up-flow clarifier, slow surface sand filters, and a chlorination/dechlorination chamber. Waste-activated sludge is stored in a sludge holding tank until it is hauled away for final disposal. Treated effluent is discharged to Mosquito Creek.

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

1. The overall operation and maintenance of the treatment works appeared to be marginal. All treatment units appeared to be in working condition.
2. The walls separating the sludge holding tanks from the aeration tanks are quite deteriorated.
3. A new sludge holding tank has been installed to service both aeration tanks. This office has not received a Permit-to-Install (PTI) application for the new tank. While this office did suggest that the facility might benefit from a new, separate sludge holding tank, you were also notified that authorization from Ohio EPA would be required prior to construction.

As such, you must cease all construction work on the tank until you have obtained a PTI for it. You must submit a PTI application to this office within 30 days' receipt of this notification. Please note that detailed drawings for PTI applications must be prepared by a registered, professional engineer.

4. The railings around the treatment plant tanks are quite loose, and must be stiffened.
5. Foaming was observed in the aeration tanks.
6. Floating sludge and high sludge blankets were observed in the clarifiers. Additionally, vegetation and heavy sludge deposits were observed in the weir troughs.
7. The sand filter distribution box needs to be cleaned, repaired (leaky), and weeded.
8. The sand filters are not being weeded, cleaned, raked, and leveled on a regular basis. Additionally, please ensure that all of the filter beds are included on a rotating schedule of use.
9. The sand filter splash pads must be leveled.
10. Please install stone riprap around the sand filter splash pads.
11. A review of the O & M logbook indicated that Kevin Mosko, of Valley Environmental Labs, Inc., is performing a significant portion of the operator duties at the plant, even though Ed Mosko is the designated operator of record. Additionally, the treatment works is classified as a Class I facility, and must therefore be visited 3 days a week for a minimum of 1.5 hours total by a Class I operator.

Since documentation reviewed by this office indicates that Kevin Mosko only has a class A wastewater license, you are failing to meet the operator requirements described in Part II, B of the NPDES permit. You must ensure that your designated plant operator is visiting the treatment works in accordance with the prescribed time requirements.

12. The flow meter did not appear to be functional.
13. Part II, K of the facility's NPDES permit requires that an outfall sign be erected no later than 4 months from the effective date of the permit, which was October 1, 2011. During the inspection, no such outfall sign was noted.
14. The final effluent appeared to be relatively clear, and did not appear to be causing any immediately-noticeable, adverse impacts to the receiving stream.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period March 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
3PV00020*ED	April 2011	001	00530	Total Suspended Solids	30D Conc	12	14.	4/1/2011
3PV00020*ED	April 2011	001	00530	Total Suspended Solids	1D Conc	18	27.	4/22/2011
3PV00020*ED	April 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	4.	4/22/2011
3PV00020*ED	May 2011	001	00530	Total Suspended Solids	30D Conc	12	13.75	5/1/2011
3PV00020*ED	May 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	5/24/2011

3PV00020*ED	June 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	3.9	6/1/2011
3PV00020*ED	September 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	4.74	9/1/2011
3PV00020*ED	September 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	3.0	13.9	9/15/2011
3PV00020*ED	September 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.57	1.05223	9/15/2011
3PV00020*FD	October 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.64	10/1/2011
3PV00020*FD	October 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	10/4/2011
3PV00020*FD	October 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	5.16	10/15/2011
3PV00020*FD	October 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	3.6	10/18/2011
3PV00020*FD	October 2011	001	80082	CBOD 5 day	7D Conc	15	19.	10/22/2011
3PV00020*FD	October 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	3.9	10/25/2011
3PV00020*FD	November 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	11/1/2011
3PV00020*FD	April 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	4/3/2012
3PV00020*FD	May 2012	001	31616	Fecal Coliform	30D Conc	1000	1000.	5/1/2012
3PV00020*FD	May 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	5/8/2012
3PV00020*FD	May 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	5	5/15/2012
3PV00020*FD	April 2013	001	00300	Dissolved Oxygen	1D Conc	6.0	4.	4/16/2013

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3PV00020*FD	January 2012	001	00630	Nitrite Plus Nitrate	1/2months	1	0	1/1/2012
3PV00020*FD	January 2012	001	00625	Nitrogen Kjeldahl, Tot	1/2months	1	0	1/1/2012

The eDMR review indicated that daily flow values have been reported as the facility's permitted design flow of 50,000 gpd since July 2012. Please note that the facility's NPDES permit requires that daily flows be monitored on a continual basis. As such, the facility has been **incorrectly** reporting its daily flows since July 2012. Failure to report monitoring data as required in the NPDES permit is a violation of the permit conditions. Please see to it that the continuous flow meter is repaired and placed back in service immediately.

The eDMR review also indicated 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 October 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 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

LAKEVIEW MHP
MAY 16, 2013
AGE 4 OF 7

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,

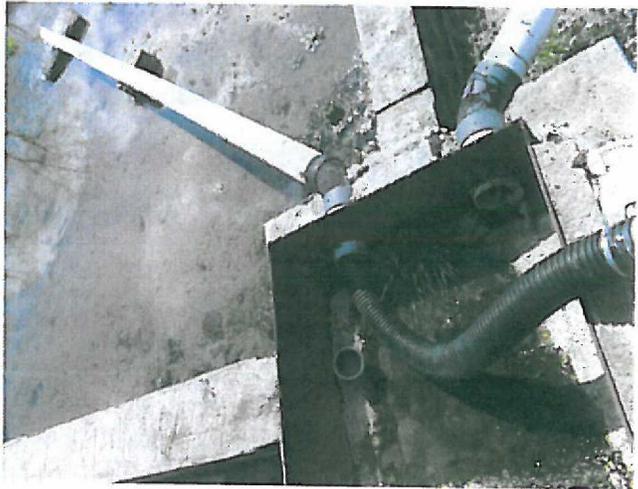
A handwritten signature in cursive script that reads "Tomás Parry".

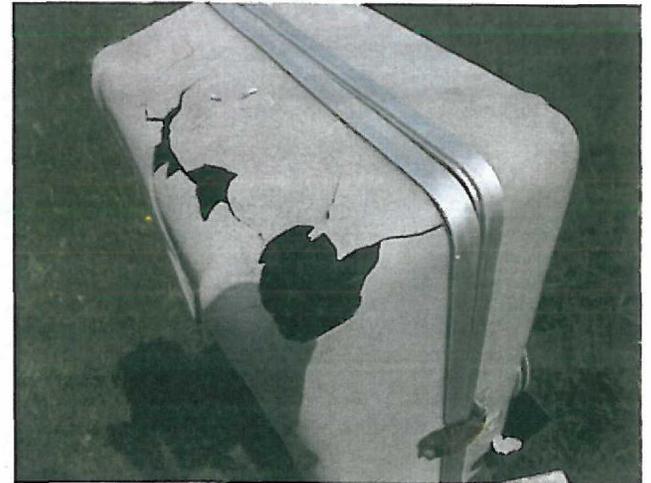
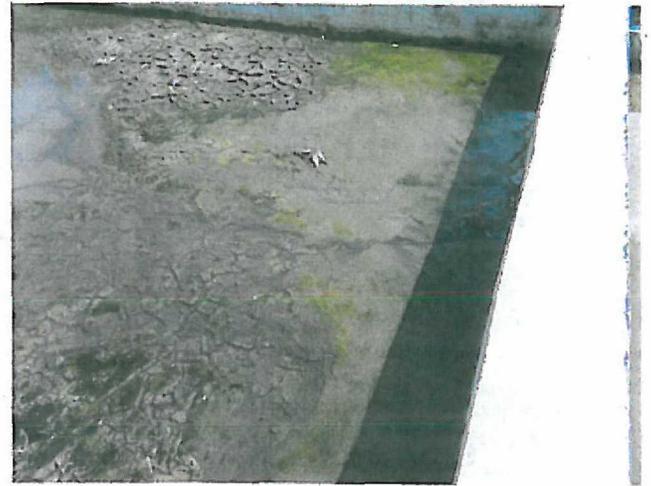
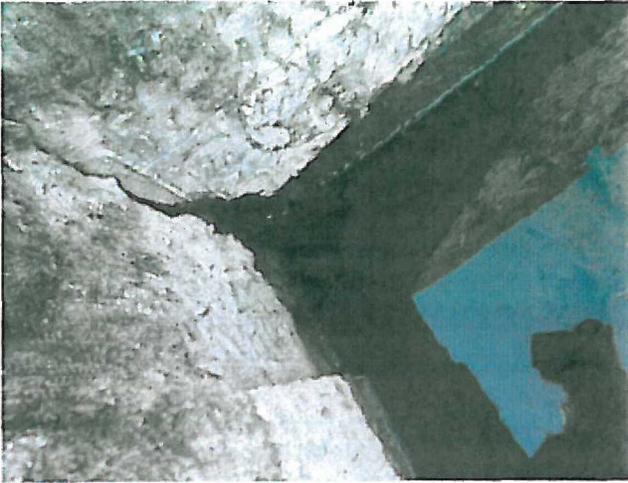
Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Valley Environmental Labs, Inc.







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<p>1. Article Addressed to:</p> <p>Jay Plymale, Owner</p> <p>Lakeview MHP 7437 Birkner Drive Kent, Ohio 44417</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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<p>PS Form 3811, February 2004</p>	<p>Domestic Return Receipt 5-20-13 102595-02-M-1540</p>