



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

May 22, 2013

RE: MAHONING COUNTY
COITSVILLE TWP
STATELINE MHP
NPDES PERMIT NO. 3PV00088
2013 CEI/NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Dan Kylie, Owner
Stateline MHP
301 Clemantis Street
West Palm Beach, FL 33401

Mr. Kylie:

On April 18, 2013, this writer, along with John Lubonovic of the Mahoning County Department of Health, conducted a previously announced inspection of the wastewater treatment system for The Glen at Stateline MHP. The intent of the inspection was to evaluate operations and maintenance of the system. A review of the monitoring record was also conducted as part of this inspection.

Observations

Following are observations made at the time of the inspection:

1. The system does not include an equalization tank for periods of peak flow. Inflow and infiltration associated with precipitation events flows directly into the aeration tank.

It was explained that air to the aeration tank is shut off during precipitation event in order to prevent solids from being washed out of the system. This practice demonstrates the need to identify and eliminate inflow and infiltration, and to install a properly designed equalization tank.
2. The contents of the aeration tank was medium brown indicating a healthy microbial population..
3. The system has only one blower to provide air to the aeration tank and to the air lift pumps in the clarifier. With only one blower, the system would be without air in the event the blower fails. Upgrade of the system to include a second blower is discussed below.
4. The contents of the clarifier appeared clear at the time of the inspection. The discharge from the clarifier was also clear.
5. There is no tertiary treatment, such as slow surface sand filters, associated with the plant.
6. There is no disinfection system associated with the treatment system. However, the operator is adding disinfection tablets in the clarifier during the disinfection season.
7. There is no sludge holding tank associated with the treatment system.

8. The outfall from the treatment system was not inspected at the time of the inspection. The treatment system discharges into a pipe that outfalls approximately ½ mile from the treatment system.
9. A drainage ditch had been excavated around the treatment to prevent surface runoff from flowing into the plant during precipitation events.
10. The treatment system was receiving a daily flow of approximately 15,000 gpd at the time of the inspection.

Compliance Review

The compliance record for the facility was reviewed as part of this inspection. The period of review was November 2012 through April 2013. Following are violations identified during the review.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2012	Total Suspended Solids	30D Conc	12.0	15.5	11/1/2012
November 2012	Dissolved Oxygen	1D Conc	6.0	5.	11/5/2012
January 2013	Total Suspended Solids	30D Conc	12.0	20.5	1/1/2013
January 2013	Total Suspended Solids	30D Qty	0.44	2.095	1/1/2013
February 2013	Total Suspended Solids	30D Conc	12.0	22.	2/1/2013
February 2013	Total Suspended Solids	30D Qty	0.44	1.99848	2/1/2013
February 2013	Dissolved Oxygen	1D Conc	6.0	4.	2/4/2013
February 2013	Dissolved Oxygen	1D Conc	6.0	5.	2/18/2013
February 2013	Total Suspended Solids	7D Conc	18.0	22.	2/22/2013
February 2013	Total Suspended Solids	7D Qty	0.67	1.99848	2/22/2013
February 2013	Dissolved Oxygen	1D Conc	6.0	4.	2/25/2013
March 2013	Total Suspended Solids	30D Qty	0.44	.79485	3/1/2013
March 2013	Total Suspended Solids	7D Qty	0.67	.79485	3/22/2013
April 2013	Total Suspended Solids	30D Conc	12.0	57.	4/1/2013
April 2013	Total Suspended Solids	30D Qty	0.44	2.3732	4/1/2013

The violation noted above cause The Glen at Stateline MHP to be in Significant Noncompliance with the National Pollutant Discharge Elimination System (NPDES) Permit. The violations noted above are subject to enforcement action per Ohio Revised Code (ORC) 6111. Be advised that violations from the wastewater treatment system must be addressed through an upgrade of the treatment system. In order to prevent this office from initiating an enforcement action against The Glen at Stateline, the wastewater treatment system must be upgraded in order to meet the pollutant limits listed in NPDES Permit 3PV00088*ED.

Required Actions

On April 22, 2009, the Ohio EPA approved an upgrade of the treatment system. The approved plans included a new equalization tank, a new clarifier, new blowers, a new sludge holding tank, a dosing tank followed by slow surface sand filters, and a disinfection system. The treatment must be upgraded to include all of the treatment units included in the April 22, 2009 Permit-to-Install (PTI).

Be advised that NPDES Permit 3PV00088*ED was issued to the facility on June 1, 2013. The NPDES Permit includes a schedule of compliance that requires actions to be taken by the mobile home park. The critical actions include:

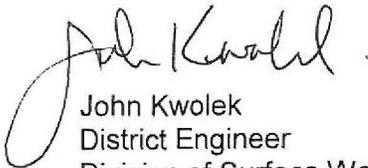
1. Submit an approvable PTI application no later than December 1, 2013,
2. Initiate construct of approved plant upgrades no later than June 1, 2014,
3. Complete construction no later than November 1, 2014, and
4. Achieve final compliance with the NPDES Permit no later than December 1, 2014.

The mobile home park must adhere to the NPDES Permit compliance schedule. Failure to do so will result in this office initiating enforcement action against The Glen at Stateline MHP.

Finally, the ditch constructed around the plant should be graded into a swale, then seeded and mulched to establish a minimum vegetative cover of 70% to prevent erosion of the system and to enable the area to be properly mowed..

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.ohio.gov in the event you have any questions regarding this inspection report.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/cs

cc. John Lubonovic, Mahoning County Department of Health

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