



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

July 11, 2013

RE: TRUMBULL COUNTY
WARREN TOWNSHIP
PLEASANT PARK MOBILE COURT
NPDES PERMIT NO. OH0107522
OHIO EPA PERMIT NO. 3PV00067
COMPLIANCE INSPECTION EVALUATION

Tom Chiarullo, Manager
Pleasant Park Mobile Court
5029 Parkman Road
Warren, Ohio 44481

Mr. Chiarullo:

Ohio EPA conducted a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on June 17, 2013. You represented the facility and the undersigned represented Ohio EPA. 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, influent lift station, 22,500-gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, chlorine disinfection, and dechlorination. Waste-activated sludge is stored in an aerated sludge holding tank until it is hauled away for final disposal. Treated effluent is discharged to Chocolate Run.

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

1. The overall operation and maintenance of the treatment works was poor. A number of the treatment system components are out of service, and must be repaired/replaced immediately. Please note that failure to ensure that proper operation and maintenance are performed on the treatment works is a violation of Part III.3 of the NPDES permit.
2. Both influent lift station pumps are out of service. A temporary pump and force main were lifting the influent up into the aeration tank. A written quote was provided to this office to indicate that replacement pumps had been ordered. Please provide a status update on the order, and the expected schedule for the new pumps to be installed.
3. The influent lift station had a number of electrical cords near the access point, creating a potential safety hazard. Additionally, follow-up photos provided by the Trumbull County Board of Health documented these active electrical cables lying in puddles of water during a heavy rain event.
4. A large amount of debris and waste material (refrigerator, dishwasher, used equipment, etc.) is being stored at the site. The matter will be referred to the Trumbull County Health Department for appropriate follow-up action.

5. The sludge holding tank was not being aerated.
6. The sludge holding tank appeared to be leaking through the construction joints, and must be repaired immediately. Additionally, the watertightness of the other tanks must be evaluated, and then repaired if necessary.
7. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
8. One of the aeration tank blowers was out of commission. It must be serviced, and restored to working condition immediately.
9. The skimmer in the settling tank was full of debris.
10. Vegetation was observed growing in the sand filters. It must be removed.
11. The sand filter dose tank only contains one pump. A second, duplicate pump must be installed in the tank.
12. Several of the pipe joints on the sand filter dose arms are leaking, and must be repaired.
13. The sand filters are ponding. They must be regularly raked level to ensure an even distribution of effluent across the surface. Additionally, please install stone riprap around the sand filter splash pads to help prevent the development of preferential flow paths.
14. The chlorination and dechlorination tablets are being stored outdoors. To prevent deterioration, they should be stored indoors in a cool, dry area.
15. There were no chlorination or dechlorination tablets in the feed tubes of the disinfection chamber. During the inspection, you placed tablets in the feed tubes at the suggestion of this office. Please provide documentation describing how often the feed tubes are checked, and who is tasked with ensuring they are stocked with tablets.

Additionally, a review of the O & M logbook indicated that your contract operator, Mr. Ed Mosko of Valley Environmental Labs, Inc., visited the treatment plant earlier on the same day this office performed its inspection. However, there was no indication in the logbook that the disinfection feed tubes were checked and/or restocked with fresh tablets. Tablets **must** be continuously stocked in the disinfection chamber during disinfection season.

16. As has been mentioned in past inspection letters, the perimeter fencing **must** be repaired/secured to prevent unauthorized access to the treatment works. This requirement was also included as a compliance schedule item in the NPDES permit. Please note that failure to meet the requirements of an NPDES compliance schedule is a permit violation.
17. The final effluent appeared to be clear, and was not causing any immediately-noticeable, adverse impacts to the receiving water body.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) from May 2011 – May 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	Sample Frequency	Expected	Reported	Violation Date
3PV00067*ED	December 2011	001	00665	Phosphorus, Total (P)	1/Quarter	1	0	12/1/2011
3PV00067*ED	December 2011	001	00630	Nitrite Plus Nitrate,	1/Quarter	1	0	12/1/2011

The eDMR review indicated that a number of missed sampling events occurred since the last inspection, and were reported as "AH". Please note that failure to perform effluent sampling/analysis as required in the NPDES permit is a violation of the permit.

This office also noted that due to a malfunctioning flow meter, flow values were not reported for the following dates: 8/2/11 and 6/26/12 – 6/28/12. An "AH" substitution code was reported for those days. Please note that missed sample/reporting events due to equipment failure must be reported as "AD". Please ensure that the entries for the referenced dates are revised to reflect the "AD" code.

Please note that a number of the O & M issues identified in this letter have been identified by this office multiple times during past site visits. The performance of the wastewater treatment works is inherently dependent on a sound operation and maintenance program. To ensure that the mobile home park's wastewater stream receives consistent, full treatment, measures must be implemented to ensure that all equipment is routinely inspected and maintained to keep it in good working condition.

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,



Tomas Parry, P.E.
Environmental Engineer II
Division of Surface Water

TP/cs

Attachments: Photographs





