



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

July 16, 2013

RE: TRUMBULL COUNTY
WEATHERSFIELD TOWNSHIP
WESTWOOD LAKE PARK MHP
NPDES PERMIT NO. OH0102822
OHIO EPA PERMIT NO. 3PV00068

Mr. Ronald Swegan
Westwood Communities, Inc.
dba Westwood Lake Park MHP
P.O. Box 688
Niles, Ohio 44446

CERTIFIED MAIL

Mr. Swegan:

Ohio EPA conducted a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on June 17, 2013. Access to the facility was granted by Mr. Jack Watson. 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 mobile home park facility is presently served by three extended aeration activated sludge package plants, which ultimately combine and discharge to a tributary of the Mahoning River through Outfall 001.

At the time of the inspection, the following observations and/or deficiencies were noted at the various plants:

Westwood Communities Plant

1. The overall operation and maintenance of the treatment works appeared to be marginal. There are a number of O & M items that need to be addressed.
2. A bound and numbered logbook was not observed at the facility. During a recent conversation with your designated plant operator, Mr. Anthony Tonus, it was indicated that Mr. Tonus keeps an O & M logbook in his vehicle. While this is acceptable, a bound and numbered O & M logbook must also be maintained on site at all times. All entries in the O & M logbook must include the date, time in/out, initials of O & M personnel, and a description of the work performed.
3. The steel tank walls are corroding, and have visible holes in them.
4. Foaming was observed in the aeration tank.
5. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.

6. Please provide confirmation on the functionality of the backup aeration blower. It must be readily available for use at all times.
7. The flow meter did not appear to be in service.
8. The sand filter distribution box is deteriorating.
9. Please provide confirmation on the functionality of the sand filter dose pumps, as they were not observed to be functioning. Both pumps must be operational at all times.
10. The sand filter walls are quite deteriorated in some areas. In certain spots, the blocks have fallen out.
11. Floating sludge was observed in the clarifier.
12. Sludge was observed in the clarifier weir trough.
13. The vegetation in the sand filters needs to be removed. In addition, sand filters should be cleaned, raked, and leveled on a regular basis to ensure even distribution of wastewater over and through the sand.

Westwood Homes Southeast Plant

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment units appeared to be in working condition.
2. A bound and numbered logbook was not observed at the facility. During a recent conversation with your designated plant operator, Mr. Anthony Tonus, it was indicated that Mr. Tonus keeps an O & M logbook in his vehicle. While this is acceptable, a bound and numbered O & M logbook must also be maintained on site at all times. All entries in the O & M logbook must include the date, time in/out, initials of O & M personnel, and a description of the work performed.
3. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
4. Foaming was observed in the aeration tanks.
5. Uncovered wiring was observed on the blower motors. This wiring should be enclosed within some type of protective conduit. This must be addressed immediately, as it was mentioned in the last inspection letter.
6. Solids carryover was observed in the weir troughs.
7. This office addressed an inspection letter to you on December 1, 2011 in which you were required to submit a Permit-to-Install (PTI) application for the sludge holding tanks in use at the plant. Additionally, Part I, C.2.a of the NPDES permit contains a compliance schedule that required a PTI application for the sludge holding tanks within 10 months of the effective date of the permit, which was April 1, 2012. To date, this office has not received a PTI application for the tanks.

A PTI application **must** be submitted to this office within 60 days' receipt of this letter, or the matter will be referred to Ohio EPA's legal section for appropriate enforcement action. You must hire a registered, professional engineer to prepare a PTI application on your behalf, and submit it to Ohio EPA for review and approval.

Westwood Homes Northeast Plant

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment units appeared to be in working condition.
2. A bound and numbered logbook was not observed at the facility. During a recent conversation with your designated plant operator, Mr. Anthony Tonus, it was indicated that Mr. Tonus keeps an O & M logbook in his vehicle. While this is acceptable, a bound and numbered O & M logbook must also be maintained on site at all times. All entries in the O & M logbook must include the date, time in/out, initials of O & M personnel, and a description of the work performed.
3. A railing must fully enclose the aeration tank.
4. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
5. Foaming was observed in the aeration tank.
6. Open wiring was observed on the blower motors. This wiring should be enclosed within some type of protective conduit. This must be addressed immediately, as it was mentioned in the last inspection letter.
7. The flow meter did not appear to be in service.
8. Excessive floating sludge was observed in the clarifier.
9. The vegetation in the sand filters needs to be removed. In addition, sand filters should be cleaned raked, and leveled on a regular basis to ensure proper percolation of wastewater through the sand.
10. The sand filter walls are quite deteriorated in some areas, and need to be repaired.

Combined UV Chamber and Final Outfall 001

1. A bound and numbered logbook was not observed at the facility. During a recent conversation with your designated plant operator, Mr. Anthony Tonus, it was indicated that Mr. Tonus keeps an O & M logbook in his vehicle. While this is acceptable, a bound and numbered O & M logbook must also be maintained on site at all times. All entries in the O & M logbook must include the date, time in/out, initials of O & M personnel, and a description of the work performed.
2. Please provide confirmation on the functionality of all of the UV bulbs.
3. Outfall signs must be placed at the location of final discharge, and must be 2' x 2' with 2-inch lettering. Please refer to Part II, K of the NPDES permit for further requirements regarding sizing and placement of the sign.

4. The final effluent was clear, and was causing no 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 October 2011 – June 2013 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00068*DD	May 2012	602	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.3	3.04	5/1/2012
3PV00068*DD	May 2012	602	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.835	5/1/2012
3PV00068*DD	June 2013	603	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.01	6/1/2013
3PV00068*DD	June 2013	603	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.3	3.2	6/15/2013

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3PV00068*DD	August 2012	602	00530	Total Suspended Solids	1/Week	1	0	8/15/2012
3PV00068*DD	August 2012	602	80082	CBOD 5 day	1/Week	1	0	8/15/2012
3PV00068*DD	August 2012	603	00530	Total Suspended Solids	1/Week	1	0	8/15/2012
3PV00068*DD	August 2012	603	80082	CBOD 5 day	1/Week	1	0	8/15/2012
3PV00068*DD	August 2012	001	00300	Dissolved Oxygen	1/Week	1	0	8/15/2012
3PV00068*DD	November 2012	001	00630	Nitrite Plus Nitrate,	1/2months	1	0	11/1/2012
3PV00068*DD	November 2012	001	00625	Nitrogen Kjeldahl, Tot	1/2months	1	0	11/1/2012
3PV00068*DD	May 2013	001	70300	Residue, Total Filtera	1/2months	1	0	5/1/2013

The eDMR review indicated that the A-substitution code "AH", or sample not taken, has been reported for the daily flow readings for Outfalls 602 and 603 from June 11, 2013 to June 30, 2013. The explanation on the eDMR indicates a broken flow meter as the reason for the missed flow readings. Additionally, a recent conversation with your designated plant operator, Mr. Anthony Tonus, indicated that the plant's final flow meter at Outfall 001 has been out of service since July 1, 2013. Thus, it appears that the facility has been missing flow readings at the various outfalls since June 11, 2013.

When equipment breaks down or is removed from service for repair/maintenance, it is this office's expectation that it is immediately serviced and restored to working condition as soon as possible. Since it appears that the facility's flow meters have been in and out of service since June 11, 2013, they **must** be repaired and placed back into service as soon as possible, but no later than 10 days from the receipt of this letter.

Please note that any missed sample events and/or daily readings due to malfunctioning equipment must be reported as "AD" on the eDMRs. Therefore, the AH values reported for the missed flow readings must be revised to reflect the AD value.

The office also noted that a number of missed sampling events occurred since the NPDES permit became effective on April 1, 2012, 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.

In addition to the inspection findings and the eDMR review, you were also required to submit to Ohio EPA, within nine 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 become effective eighteen months after the effective date of the 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 new E. coli limits, the report is still necessary.

Your designated plant operator, Mr. Anthony Tonus, indicated that Dissolved Oxygen samples are analyzed at a laboratory. Please submit documentation describing how the samples are taken and analyzed. Please be specific in regards to the sample collection and storage technique, containers used, preservation techniques, laboratory analysis method, travel time to laboratory, etc.

Ohio EPA understands that Mr. Anthony Tonus handles the operation and maintenance responsibilities for the facility, and Valley Environmental Labs, Inc. performs the necessary sampling and laboratory analyses. We also understand that Valley Environmental Labs, Inc. is currently submitting the eDMR data for the facility. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 Code of Federal Regulations (CFR) 122.22".

40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

A person is a duly authorized representative if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

Therefore, based on the requirements outlined in 40 CFR 122.22, and the fact that this office has no documentation on file indicating that Valley Environmental Labs, Inc. has been retained as the designated contractor wastewater operator for the facility, Valley Environmental Labs, Inc. may not submit eDMR data on behalf of Westwood Lake Park MHP.

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.

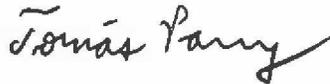
Please note that a number of the issues mentioned in this letter have been brought to your attention in past inspection letters. As such, you must provide to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to

address the items identified in this letter. Your response shall include specific dates for the initiation and completion of this action plan.

Additionally, should you fail to adequately address all of the items indicated in this letter, this office will consider calling you in for a meeting to discuss the reasoning for the continued noncompliance at the facility, and corrective measures that must be implemented to return the facility to compliance with all of the conditions in the NPDES permit.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,

A handwritten signature in black ink that reads "Tomás Parry". The signature is written in a cursive style with a prominent flourish at the end.

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

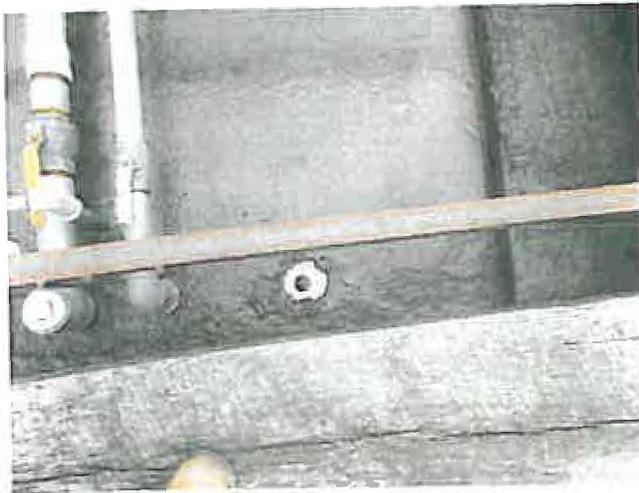
TP/cs

cc: Anthony Tonus

Attachments: Photographs







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<p>1. Article Addressed to:</p> <div style="background-color: #add8e6; padding: 5px; border: 1px solid black;"> <p>Mr. Ronald Swegan Westwood Communities, Inc. dba Westwood Lake Park MHP P.O. Box 688 Niles, Ohio 44446</p> </div>	<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>2. Article Number (Transfer from service label) <i>7012 3050 0001 8843 1375</i></p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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