



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

September 10, 2013

RE: MOBILE ACRES MOBILE HOME PARK
NPDES PERMIT NO. 3PV00083
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Steve Mannier, Owner
Mobile Acres Park and Sales
3711 Blake Road
Ashtabula, Ohio 44004

Dear Mr. Mannier:

On September 9, 2013, a site inspection was conducted at the above referenced facility at 4531 South Ridge Road East (U.S. Route 20), Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you and Mr. Milo Nemeč represented Mobile Acres Park and Sales d.b.a. Mannier's Mobile Acres Mobile Home Park. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on August 15, 2012.

Observations

Following are observations made during the inspection:

1. The plant is operated by you as the operator of record (ORC). You and Mr. Nemeč collect samples, perform some limited onsite readings (pH, turbidity, flow), and submit samples for laboratory analyses. Once data is received from the laboratory, you electronically submit the data to the electronic discharge monitoring report (eDMR) system. Laboratory data is conducted by Microbac Laboratories of Erie, PA.
2. Log books, the NPDES permit, and the operation and maintenance manual are maintained at the site. The information was found compliant with OAC 3745-7-09. The plant is currently seen at least twice weekly by the ORC.
3. The trash trap is typically cleaned 3 to 4 times yearly. In the winter months, the sludge holding tank is also pumped out and placed on the sludge drying beds. Dried sludge is placed into a 40 CY covered roll-off dumpster, located along the south fence of the WWTP. When the dumpster is full, dried sludge is then hauled to the Waste Management Geneva Landfill.
4. The pump station grinder pumps and associated alarms were cycled and found in operable condition. The pump station and equalization tank are scheduled to be cleaned on September 10, 2013.
5. The blowers and associated alarms were cycled. Both blowers were found in operable condition. The content of the aeration tank had a good color and mixing. No odor was noted. Sludge returns were a medium brown color with minimal foaming.

6. The surface of the clarifier was observed as clear. The skimmer appeared to be operating as designed. Mr. Nemecek was removing sum from the clarifier during the inspection and placing the skimmings into the aerated sludge holding tank. Effluent channels were reasonably clean. A chlorine tablet was noted in the effluent weir, and you noted that this cuts down on biological growth in the weir.
7. The dosing tank pumps and alarms were cycled and found in operable condition.
8. Surface sand filters are maintained under roof, and were operable. The west filter bed was in use, and was clean and recently raked while the east bed was resting. A new wall was constructed the week of September 2, 2013. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The east filter was also found clean, raked, and level.
9. The chlorination and dechlorination tanks were stocked with chemicals and operating properly. The post-disinfection aeration system was also operating properly.
10. The final effluent was clear. The final discharge at the unnamed tributary was observed as of satisfactory visual quality.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2012 through August 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|------------------------|------------|-------|----------------|----------------|
| 001 | 00400 | pH | 1D Conc | 6.5 | 2.6 | 7/12/2012 |
| 001 | 00400 | pH | 1D Conc | 6.5 | 1.6 | 8/22/2012 |
| 001 | 00530 | Total Suspended Solids | 1D Conc | 18 | 20.5 | 8/8/2012 |
| 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 20.5 | 8/1/2012 |
| 001 | 80082 | CBOD 5 day | 30D Conc | 10 | 10.1 | 8/1/2012 |

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any effluent violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. As discussed with you during the inspection, Ohio EPA has not received a written notification of the July 2012 and August 2012 violations. A verbal explanation provided for these pH violations was that the low pH levels were recorded by the pH meter during the calibration process and does not reflect the actual pH level of the effluent. If the pH levels are not representative of an actual sample collected, it should be removed from the eDMR and the actual lowest level pH should be recorded. When a calibration is performed, the meter should be placed into a calibration mode to ensure that the minimum monthly data is not reflected in the monthly minimum and recorded on the eDMRs. Ohio EPA recommends that the July 2012 and August 2012 eDMRs be revised to reflect the actual lowest pH values recorded for monitoring the effluent. Please use the above referenced forms to provide a written explanation for these apparent violations along with remedies to ensure that they are not repeated.

Reporting Violations

The following reporting code violas are noted for the reporting period reviewed:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|----------------|------------|-------|----------------|----------------|
| 001 | 31616 | Fecal Coliform | | | AB | 5/8/2013 |

The reporting code provided indicates that the analytical data was lost. Notes provided into the eDMR indicates that a sample was collected but no analytical results was reported by the reporting laboratory. Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any reporting code violations, along with measures taken to ensure that they are not repeated.

Ohio EPA notes that some of the eDMR information continues to be submitted later than the required time specified in Part III, Item 4 of your NPDES permit requires that eDMR information to be submitted no later than the 20th of each month for the preceding month (i.e. – the July 2012 eDMR report is due no later than August 20th). Care must be taken to ensure that data is reported in compliance with your NPDES permit.

Compliance Schedule

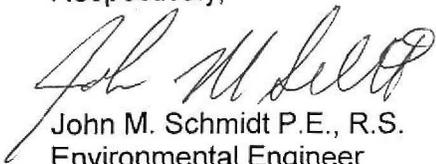
Your current NPDES permit does not contain a compliance schedule, but your new permit, which becomes effective on September 1, 2012, contains the following compliance schedule:

| Permit Effective Date | Permit Expiration Date | Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone |
|-----------------------|------------------------|-------------------|-----------------|------------|---------------|----------------------|
| 9/01/2012 | 8/31/2017 | 3/01/2013 | Incomplete | 95999 | Compliance | E Coli Status Report |
| 9/01/2012 | 8/31/2017 | 6/1/2013 | N/A | N/A | Compliance | Submit PTI if needed |
| 9/01/2012 | 8/31/2017 | 1/01/2014 | 11/01/2013 | 05699 | Compliance | Achieve Final Limits |

Ohio EPA notes that we have not received a status report stating that the facility will be able to comply with the new E Coli limits without any plant modifications. A review of the eDMR data for the 2013 disinfection season indicates that the plant should be able to meet the new bacteria standards. Please submit a short status report on the ability of the plant to meet the new bacteria standards.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

FILE/Semipublic/Ashtabula/Ashtabula Twp/Mannier's Mobile Acres MHP (3PV00083)