



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



September 19, 2013

RE: DFC MOBILE HOME PARK
NPDES PERMIT NO. 3PV00081
LENOX TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

NOTICE OF VIOLATION

CERTIFIED MAIL

Ms. Lois Adkins, Owner
DFC Mobile Home Park
1600 Lennox New Lyme Road
Jefferson, OH 44047

Dear Ms. Adkins:

On September 18, 2013, a site inspection was conducted at the above referenced facility at 1600 Lenox-New Lyme Road, Lenox Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Phil Brazil and Tim Adkins represented DFC 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 in conjunction with the renewal of said permit. The last compliance inspection was conducted on October 22, 2013.

The collection system consists of a gravity system from the mobile home park. The treatment system consists of a trash trap, 12,000 gallon equalization basin, a 9,000 gallon extended aeration plant with clarification, dosing tank, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the aeration system and trash trap when needed to another publicly owned treatment works (POTW). The facility discharges to an unnamed tributary of Cemetery Creek adjacent to the southwest side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations and Notations

1. The plant is operated by Todd Bort, and is seen by Phil Brazil and/or Tim Adkins on days the plant is not seen by Mr. Bort. Mr. Bort is currently listed as the Operator of Record (ORC) of this facility.
2. Log books, copy of the NPDES permit, copy of the contract with your Operator of Record, and the operation and maintenance manual which are supposed to be maintained at the site by the current operator have apparently been stolen. If the plant is subject to vandalism, the WWTP shed must be securely locked with a lock that can be accessed by Ohio EPA. Due to the lack of information, onsite records are not in compliance with OAC 3745-7-09.
3. Mr. Bort and/or Mr. Brazil collect samples and analyze the effluent for water temperature and pH, and Lisa Fagel of Geauga County Department of Water Resources performs remaining

laboratory analyses. Mr. Brazil collects the data from both Mr. Bort and Ms. Fagel and electronically submits the data to the electronic Discharge Monitoring Report (eDMR) system, utilizing Lois Adkins' account. Mr. Adkins and Mr. Brazil must obtain their own eDMR accounts with delegation from Ms. Adkins so that data may be properly submitted and pinned by the person actually submitting the reports.

4. The trash trap and excess sludge from the aeration system is removed annually and hauled to another WWTP. Sludge was last removed from the plant on July 13, 2013, according to Mr. Adkins and Mr. Brazil. Ohio EPA has no records of annual sludge reports prepared for this facility.
5. The flow equalization blowers and alarms were cycled. Pump No. 2 was found not operable and Pump 1 was found operable, but the switch was missing. The alarm was found not functional due to the missing switch. Pump No. 1 switch, Pump No.2, and the alarm must be repaired as soon as possible. Ohio EPA notes that a single blower serves the flow equalization tank. A second blower is recommended to provide air in case the primary blower needs to be taken out of service for repair. A significant amount of foaming was noted in the equalization tank, and the air distribution in the tank is not even, with the north end of the tank receiving almost no air and too much air noted in the south tank. There is likely an air leak or clogged headers that should be pulled and examined.
6. The aeration tank blowers and alarms were cycled and found operational. It is noted that separate blowers provide air to the newer and older aeration tanks. The content of the aeration tanks had a dark brown color, fair mixing, and had a musty odor. The air was very uneven with a possible clog or air line break at the south end of the tank. This must be investigated and repaired. Sludge returns were also a dark brown color with minimal foaming.
7. The surface of each clarifier was reasonably clear, with some grease noted at the surface. The skimmer found functional during the inspection. Grease should be removed from the grease baffles. Effluent channels and weirs were reasonably clean.
8. The dosing tank pumps were cycled, and one pump was not found operational. This should be corrected as soon as possible. The plumbing is currently configured so that one pump can only dose one bed. This should be re-plumbed to enable either pump to operate and divert wastewater to either bed. Dosing pumps should also have run-time meters on them to more accurately estimate the daily flow.
9. Surface sand filters were reasonably clean and operable, with both beds raked and level. The operating dosing pump to the South Bed discharged to the bed and was reasonably clear and percolated freely through the bed, indicating that it was not clogged. Dosing the North Bed could not be performed due to an inoperable pump.
10. Approximately 2,500 gallons of sludge was removed from the facility on July 13, 2013 by Easton Service, and the septage hauled to the Orwell Wastewater Treatment Plant.
11. The chlorination and dechlorination tanks were found reasonably clean and stocked with the appropriate chemicals.

12. The final outfall was observed as of acceptable visual quality. There is no final outfall signage.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDsMRs) received by Ohio EPA for the period October 1, 2012 through September 1, 2013 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Effluent Limit Violations

The following effluent limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	4.02	1/4/2013
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	4.02	1/1/2013
001	00610	Nitrogen, Ammonia (NH3-N)	30D Qty	0.05	.06543	1/1/2013
001	80082	CBOD 5 day	30D Conc	10	13.5	1/1/2013
001	00610	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	4.02	12/22/2012
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	4.02	12/1/2012
001	80082	CBOD 5 day	30D Conc	10	13.5	12/1/2012
001	00610	Nitrogen, Ammonia (NH3-N)	1D Conc	2.3	9.57	2/26/2013
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	9.57	2/1/2013
001	00610	Nitrogen, Ammonia (NH3-N)	1D Qty	0.08	.26442	2/26/2013
001	00610	Nitrogen, Ammonia (NH3-N)	30D Qty	0.05	.26442	2/1/2013

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](http://epa.ohio.gov/portals/35/permits/24-hour%20Report%20FactSheet.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 above referenced violations. 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. Ohio EPA notes that DFC has been in **significant noncompliance for ammonia** in 2012 and 2013.

Ohio EPA also notes that we have not received eDMR facility reports for the month of May 2013. Therefore effluent violations during these months could not be assessed by Ohio EPA.

Reporting Frequency and Code Violations

As noted above, Ohio EPA has not received eDMR facility reports for the month of May 2013. The missing eDMR report for May 2013 was discussed with both Tim Adkins and Phil Brazil on August 1, 2013, and detailed information was hand delivered to Mr. Brazil on August 19, 2013. Ohio EPA is aware that DFC has been having difficulty inputting historical eDMR reports through the e-biz system, and plans to submit the May 2013 eDMR report in the near future. Ohio EPA notes that several of the Monthly eDMR reports were submitted late, some by several months. Failure to submit monthly reports as prescribed by your permit has placed DFC in **significant noncompliance for failure to submit required data**.

Compliance Schedule Violations

The following compliance schedule violation was noted:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
11/29/06	12/31/11	7/2/07	Incomplete	11599	Report	Inflow and Infiltration Report

Per discussions with Mr. Adkins, an inflow and infiltration study was being initiated and DFC was confirming a schedule to complete the study with its design engineer. To-date Ohio EPA has not received a response from DFC. **DFC must submit an alternative schedule for the I/I study and necessary WWTP improvements to Ohio EPA as soon as possible.**

Other Violations

1. Failure to Maintain a Facility Log Book and Other Onsite Records: The inspection revealed that records required pursuant to OAC 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. A log book must be maintained in a secure location at the WWTP and available for inspection 24 hours a day. A lock which Ohio EPA has access to must be provided for the WWTP shed or obtaining a lockable mailbox or some other weather-tight container at the WWTP. The records must be accessible onsite for twenty-four hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A)(2). The facility Owner and Operator are both responsible to make sure that the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. The log must include inspection dates with time in and time out, clearly identify who is logging time at the facility, and list all activities being performed during the visit, including any analysis not represented by a laboratory bench sheet. In addition to the log book, a copy of the contract with your ORC, as well as an operation and maintenance manual must be maintained at the site. None of these items were available for inspection as required by rule. For future reference, please indicate where these items will be maintained so that they are accessible to Ohio EPA staff and emergency personnel.
2. Minimum Staffing Requirements: Based upon a lack of a log book to document visits by your ORC, DFC MHC is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements. The facility must be staffed by a licensed operator twice weekly for a total of an hour and that information documented in the facility log.
3. Failure to Report Monitoring Data: Part III, Item 4 of your NPDES permit requires you to report data to Ohio EPA electronically. A review of Ohio EPA files finds no data reported for the month of May 2013.
4. Failure to Provide Annual Sludge Reports: Ohio EPA has no records of annual sludge reports submitted for this facility, although previous inspections indicate that sludge is removed from this facility annually. Part II, Item I requires DFC to submit an annual sludge report no later than January 31 for the previous calendar year. DFC is in violation of OAC 3745-33 for not meeting permit conditions, specifically Part II, Item I of your permit requires DFC to submit the annual sludge reports.

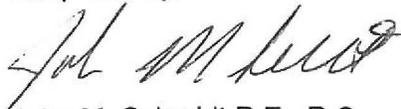
Based upon a lack of a log book to document visits by your ORC, NCO is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, OAC 3745-7-09 for not maintaining all the required information at the wastewater treatment facility (log book, contract, NPDES permit, and O&M Manual), and OAC 3745-33 for not meeting permit conditions, specifically Part II, Item A that requires that this facility be overseen by an ORC. During the site visit, I provided DFC with another copy of Ohio EPA's O&M Manual for Package WWTPs.

While improvements have been made, based upon the inspection findings and the overall compliance record of the facility, the DFC MHP remains in significant noncompliance with the terms and conditions of its NPDES permit for historical ammonia violations, as well as missed milestones (completion of the I/I study). While the lack of effluent violations since February 2013 is encouraging, Ohio EPA will continue to monitor your eDMR data to ascertain when you are no longer in significant noncompliance. As noted in my November 23, 2011 letter, due to the severity and nature of the violations at this facility, Ohio EPA district office has referred this matter for escalated enforcement.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

cc: Tim Adkins
Phil Brazil
Gary Whitaker, Ohio Manufactured Homes Commission of Ohio
Brittany Smith, Ohio EPA, DSW, CO
Martha Horvitz, Ohio EPA, Legal, CO

File/SP/Ashtabula/Lenox Twp./DFC Mobile Home Park (3PV00081)

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PS Form 3800, August 2006

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1. Article Addressed to:

Ms. Lois Adkins, Owner
 DFC Mobile Home Park
 1600 Lennox New Lyme Road
 Jefferson, OH 44047

2. Article Number

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Kim Fedelschok

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PS Form 3811, February 2004

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