Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 1, 2011

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

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

Dear Mr. Swegan:

Ohio EPA conducted a compliance evaluation inspection at the above-referenced facility on November 3, 2011. Mr. Merle Campbell represented Westwood Lake MHP and Ms. Brianne Ciccone, Mr. Ermelindo Gomes, and the undersigned represented Ohio EPA. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of its 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. Please note that these observations can apply to all three of the plants.

Westwood Communities Plant:

1. Significant corrosion was observed on the walls of the tanks. In one area, holes were observed. These should be repaired.

2. The sand filter walls are quite deteriorated in some areas, and need to be repaired.

3. There is a housing box for a backup blower, however, no actual blower was noted. A backup blower is required.

4. Foaming was observed in the aeration tank.

5. For safety purposes, please install additional grating over the clarifier.

6. A large amount of floating sludge was observed in the clarifier. This should be regularly skimmed. In addition, please ensure that efforts are made to settle as much of the sludge as possible.

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7. Spare belts should be maintained on site for all motors.

8. The sand filter distribution box was quite deteriorated, and leaking badly in several spots. This needs to be addressed.

9. Stone riprap should be installed around all splash pads.

10. 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.

Westwood Homes Southeast Plant:

1. The plant appeared to have been previously washed out. The contents (mixed liquor) of the aeration tank were greyish in color with a low solids inventory. Such a situation is typically indicative of excessive infiltration/inflow (I/I) in the sewer system. Generally speaking, a well-operated treatment plant should have the mixed liquor with a medium chocolate brown color.

2. Continued poor performance of this plant may necessitate the need for the installation of a flow equalization basin.

3. Open wiring was observed on the blower motors. This wiring should be enclosed within some type of protective conduit.

4. A permit-to-install (PTI) is required before any type of modification can be made to a facility's wastewater treatment system. This office performed a records review, and could not locate a PTI for the white, plastic aerated sludge holding tanks that are currently in use at this plant. A PTI will be required for the installation of the sludge holding tanks. However, the tanks currently in service do not meet Ohio EPA approved design criteria. They will have to be removed, and then replaced with an approved design. Please consult with a registered, professional engineer to come up with a design for an appropriate aerated sludge holding tank system. This system will need to be approved by Ohio EPA in the form of a PTI.

5. Please ensure that both aeration tanks are connected to both blowers to ensure that backup blower capacity is available to the tanks in the event of a failure of the active blower.

6. The chlorine contact chamber is full of heavy sludge and solids deposits, and needs to be cleaned immediately.

7. A large amount of floating sludge was observed in the clarifier. This should be

regularly skimmed. In addition, please ensure that efforts are made to settle as much of the sludge as possible.

Westwood Homes Northeast Plant:

1. 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.

2. The sand filter walls are quite deteriorated in some areas, and need to be repaired

Combined UV Chamber and Final Outfall 001:

1. At the time of the inspection, the UV disinfection system was still in use. Disinfection is only required from May 1 – October 31.

2. The Outfall 001 discharge pipe is cracked.

3. The final effluent was clear, and was causing no immediately observable, adverse impacts to the receiving stream.

In addition to the above-referenced observations, please ensure that bound and numbered log books are used to record all operation and maintenance activities that are performed at the treatment plants. The log book should be maintained on site at all times. Operation and maintenance personnel shall include their arrival and departure times, their initials, and a description of the work performed during each plant visit.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period June 2008 – October 2011 indicates violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2008	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.2	9/1/2008
September 2008	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	2.61	9/5/2008
December 2008	602	00530	Total Suspended Solids	30D Conc	12	14.2	12/1/2008
December 2008	602	00530	Total Suspended Solids	1D Conc	18	19.	12/16/2008
December 2008	602	00530	Total Suspended Solids	1D Conc	18	36.	12/24/2008
December 2008	602	80082	CBOD 5 day	1D Conc	15	17.	12/24/2008
July 2009	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	1.91667	7/1/2009
July 2009	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	5.37	7/14/2009

July 2009	603	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	2.57	7/14/2009
May 2010	603	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	3.28	5/1/2010
May 2010	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	5.43	5/1/2010
May 2010	602	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.28978	5/1/2010
May 2010	603	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	5.82	5/5/2010
May 2010	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	9.78	5/5/2010
May 2010	602	00610	Nitrogen, Ammonia (NH3	1D Qty	0.32	.51824	5/5/2010
June 2010	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.	6/1/2010
July 2010	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.	7/1/2010
July 2010	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	3.1	7/21/2010
June 2011	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	4.665	6/1/2011
June 2011	602	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.22812	6/1/2011
June 2011	603	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.615	6/1/2011
June 2011	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	5.04	6/3/2011
June 2011	603	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	2.87	6/3/2011
June 2011	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	4.29	6/15/2011
June 2011	603	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	2.36	6/15/2011
July 2011	602	80082	CBOD 5 day	1D Conc	15	18.	7/14/2011
August 2011	602	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	6.43	8/1/2011
August 2011	602	00610	Nitrogen, Ammonia (NH3	30D Qty	0.2	.3204	8/1/2011
August 2011	603	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	4.115	8/1/2011
August 2011	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	5.37	8/4/2011
August 2011	603	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	2.46	8/4/2011
August 2011	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	7.49	8/17/2011
August 2011	602	00610	Nitrogen, Ammonia (NH3	1D Qty	0.32	.3969	8/17/2011
August 2011	603	00610	Nitrogen, Ammonia (NH3	1D Conc	2.3	5.77	8/17/2011
September 2011	602	00610	Nitrogen, Ammonia (NH3	1D Conc	2.25	4.31	9/1/2011

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2010	602	00400	pH	1/Week	1	0	09/22/2010
September 2010	001	00300	Dissolved Oxygen	1/Week	1	0	09/22/2010
September 2010	602	80082	CBOD 5 day	1/Week	1	0	09/22/2010
September 2010	603	00530	Total Suspended Solids	1/Week	1	0	09/22/2010
September 2010	603	80082	CBOD 5 day	1/Week	1	0	09/22/2010
September 2010	602	00530	Total Suspended Solids	1/Week	1	0	09/22/2010
September 2010	603	00400	pH	1/Week	1	0	09/22/2010

The facility's current NPDES permit expires on January 31, 2012. This office received a permit renewal application on May 11, 2011. Based on the inspection findings, this office will proceed with processing the renewal application.

Once the new NPDES permit is issued, OEPA advises that the permittee read through it carefully, as there will be a number of changes made to it. One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with Escherichia coli (E. coli) monitoring limits. The permitee will be given an eighteen month conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. Monitoring requirements for E. coli, and all other new parameters, will be described in the new permit.

We understand 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 electronic DMRs (eDMRs) 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 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.*

This office has no documentation on file that satisfies these requirements. Therefore, based on the requirements outlined in 40 CFR 122.22, Valley Environmental Labs, Inc. may <u>not</u> submit eDMR data on behalf of Westwood Lake MHP.

Please be aware that once the facility's NPDES permit is renewed, it will contain language requiring the permittee to designate a specific operator of record. This individual will be

responsible for spending the required amount of time at the plant (in accordance with Ohio Administrative Code 3745-7-04), and performing necessary operation and maintenance tasks. Please complete and submit the enclosed Operator of Record Certification (ORC) form to ensure that this requirement will be met.

Please provide to this office, in writing, within 21 days' receipt of this letter, the actions proposed or taken to address the deficiencies outlined in this letter. Your response shall include specific dates for the initiation and completion of this action plan.Please be advised that the above-referenced violations are subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to $10,000 per day of violation.

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

Respectfully,

Tomás Parry

Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

ec: Brianne Ciccone, OHIO EPA, NEDO, DSW
Ermelindo Gomes, OHIO EPA, NEDO, DSW

Attachments: Photographs

Enclosures: ORC Form

Ohio Environmental Protection Agency
Division of Drinking and Ground Waters
Operator Certification Unit

Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
Division of Drinking and Ground Waters
Operator Certification Unit
50 West Town St, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

Phone: (614) 644-2752
1- 866 - 411-OPCT (6728)
Fax: (614) 644-2909
email: opcert@epa.state.oh.us
website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #:_____ STU # _____ Classification: _____

_____ _____
Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
(Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	