



**Environmental
Protection Agency**

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

November 29, 2011

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 November 28, 2011, 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, and nobody 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 November 3, 2010.

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 POTW. The facility discharges to an unnamed tributary of Mill 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. A log book of operations could not be located during the course of the inspection. A calendar was located in the maintenance shed that noted daily color readings that was apparently last used on October 6, 2011. This facility does not have a designated Operator of Record (ORC). Ohio EPA could not locate a copy of the contract between DFC and its operator, Mr. Bort.
2. Based upon the 2010 inspection, DFC indicated that the plant is operated by Todd Bort on behalf of DFC MHP. DFC collects samples and analyzes for water temperature and pH, and Lisa Fagel of Geauga County Department of Water Resources performs remaining laboratory analyses. You collect the data from both Mr. Bort and Ms. Fagel and electronically submit the data to the electronic discharge monitoring report (eDMR) system on behalf of your facility.

3. The trash trap and excess sludge from the aeration system is removed annually and hauled to another WWTP. Ohio EPA has no records of annual sludge reports prepared for this facility.
4. The overall condition of the treatment plant during this inspection was marginal. The extended aeration plant blowers were cycled and found to be operable. The blowers to the flow equalization tank were off.
5. The content of the aeration tank had a light brown color and fair mixing. Dead spots were noted in the aeration tank suggesting that some air headers may be plugged. Sludge returns were a light brown color with minimal foaming. The surface of the clarifier was clear, and the skimmer appeared to be operating as designed. Effluent channels could use a good cleaning.
6. The dosing tank pumps were cycled and found in operable condition.
7. Surface sand filters were both noted as containing sludge. This is indicating a problem in the aeration system, most likely due to a lack of wasting sludge. Only one sand filter should be used at any one time, with the remaining bed allowed to rest and have any sludge removed as soon as possible. Both sand filters were completely rebuilt in 2010.
8. The chlorination and dechlorination tanks were not examined due to the conclusion of the disinfection season. The post-disinfection aeration system was also operating properly. It is noted that the disinfection season concluded on October 31.
9. The final outfall was observed as slightly turbid.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2010, through October 1, 2011, 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	00530	Total Suspended Solids	30D Conc	12	36.	11/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	9.03	11/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.08886	11/1/2010
001	00530	Total Suspended Solids	1D Conc	18	36.	11/24/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	9.03	11/24/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.08886	11/24/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	1.56	12/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	9.57	1/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.1304	1/1/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	9.57	1/27/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.1304	1/27/2011

DFC MOBILE HOME PARK WWTP
 NOVEMBER 29, 2011
 PAGE 3 OF 5

001	00530	Total Suspended Solids	30D Conc	12	13.	2/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	9.4	2/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.15655	2/1/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	9.4	2/25/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.15655	2/25/2011
001	80082	CBOD 5 day	30D Conc	10	15.1	3/1/2011
001	80082	CBOD 5 day	1D Conc	15	15.1	3/24/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.259	4/1/2011
001	80082	CBOD 5 day	30D Conc	10	10.4	4/1/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	12.	4/13/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.16351	4/13/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	4.82	5/1/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	4.82	5/18/2011
001	00530	Total Suspended Solids	30D Conc	12	16.5	6/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	7.035	6/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.05	.07396	6/1/2011
001	00400	pH	1D Conc	6.5	6.41	6/5/2011
001	00530	Total Suspended Solids	1D Conc	18	30.	6/7/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.17	6/7/2011
001	00400	pH	1D Conc	6.5	5.95	6/12/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	10.9	6/15/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.08	.11552	6/15/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	3.17	7/1/2011
001	80082	CBOD 5 day	30D Conc	10	11.6	7/1/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.17	7/20/2011
001	31616	Fecal Coliform	1D Conc	2000	3260.	8/9/2011

Ohio EPA notes that written explanation for the November 1, 2010, events was provided in correspondence dated November 29, 2010. Ohio EPA notes that the remaining violations have placed DFC MHP in significant noncompliance for nitrogen ammonia as noted in my August 5, 2010, October 19, 2011, and November 23, 2011, letters. A written explanation as to why remaining exceedence events occurred must be provided, along with measures to ensure that they are not repeated. A written response to these events must be provided.

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	11/29/2011	11599	Report	Inflow and Infiltration Report

Ohio EPA notes that you responded that repairs to your facility have eliminated the need to study excess infiltration and inflow into your collection system. Ohio EPA notes that effluent violations continue and that an infiltration and inflow study may still be required.

Other Violations

1. Failure to Designate an Operator of Record - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Although you indicated in the 2010 inspection that Todd Bort is your operator of record (ORC) and that Tim Adkins plans to take the examination to become a Class A operator, Ohio EPA finds no record of Tim Adkins possessing a Class A license and no official designation has been received by Ohio EPA Central Office. Ohio EPA does locate a Todd Bort with a Class 3 license, but is not designated as your ORC. Your treatment plant must have an officially designated ORC. DFC MHP may enter into a contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation thereof provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. To-date, Ohio EPA has not received a contract with an appropriately certified operator. The operator of record designation form may be found at http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf.
2. Failure to Maintain a Facility Log Book: During the course of the inspection, Ohio EPA could not locate a copy of the log book required by OAC 3745-7-9. 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. In addition to the log book, a copy of the contract between DFC and its ORC must also be available at the WWTP. Typically this is maintained in a notebook in a control panel. 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). DFC is in violation of OAC 3745-33 for not meeting permit conditions, specifically Part II, Item A that requires that this facility be overseen by an ORC.
3. Failure to Meet Minimum Staffing Requirements: Without a log book and regular visits documented by a licensed operator, DFC has failed to meet minimum staffing requirements as required by OAC 3745-7-04. The facility must be inspected by a licensed operator at least twice weekly for a minimum of one hour weekly.
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, 2012, for the previous calendar year. DFC is in violation of OAC 3745-33 for not meeting permit conditions, specifically Part II, Item I that requires DFC to submit the annual sludge reports.
5. NPDES Permit Renewal: Your current NPDES permit will expire on December 31, 2011; therefore its NPDES renewal application was due to Ohio EPA no later than June 30, 2011. To-date, no NPDES renewal has been received. DFC is in violation of OAC 3745-33-03(B).

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 due to the suspended solids violations in July and August. Ohio EPA will continue to monitor your eDMR data to see 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 will be referring this matter for escalated enforcement.

DFC MOBILE HOME PARK WWTP
NOVEMBER 29, 2011
PAGE 5 OF 5

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 notification, 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

pc: File: SP/Ashtabula/Lenox Twp./DFC Mobile Home Park