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

January 4, 2011

RE: TOWN AND COUNTRY MHP
22970 STATE ROUTE 30
WEST TOWNSHIP
COLUMBIANA COUNTY
NPDES PERMIT #3PV00124

Mr. Randy Perkins
P.O. Box 337
Tallmadge, OH 44278

NOTICE OF VIOLATION

Dear Mr. Perkins:

On December 6, 2011, this writer conducted an inspection of the wastewater treatment plant (WWTP) for the Town and Country Mobile Home Park (MHP). The intent of the inspection was to evaluate operations and maintenance of the system. This facility is currently in significant non-compliance for failure to submit a renewal National Pollutant Discharge Elimination System (NPDES) application, effluent violations, failure to submit monthly monitoring reports and unauthorized discharges from the plant. The following are findings from the inspection:

1. The trash trap was not inspected.

2. At the time of the inspection the aeration tank was not operational and the plant was grey and septic. The effluent in the dosing chamber was grey and septic.

3. Both surface sand filters were covered with solids and filled with grey sewage. The south filter was ponded and discharging sewage across the ground through a break in the wall. This is an unauthorized discharge to waters of the state of Ohio and a violation of your NPDES permit. The surface sand filters are in need of cleaning and need replacement sand. The replacement sand should be uniformly level so that the beds flood evenly. The coating of sludge being removed from the sand filters need to be disposed at a licensed solid waste landfill. Maintaining a better solids concentration in the aeration system will result in a better settling sludge. The sludge will more effectively settle in the settling tank and not reach the filters as is currently the situation.

4. The new flow equalization tank and sludge holding tank has been installed and they were operational.

5. Elapsed time meters have not been placed on the dosing pump yet. Flow readings are inaccurate. The flow meter must be installed immediately. The dosing chamber must be returned to its original design and all necessary equipment replaced.

6. A review of the electronic Discharge Monitoring Report (eDMR) submitted by you indicate several months of data are missing. The missing months include: December 2010 through May 2011. This data must be reported as soon as possible.

7. A review of the monthly operating data from April 2008 through November 2011 revealed numerous violations. The violations are attached to this correspondence.

8. The fence still needed repaired from the construction and several pieces of equipment needed repairs.

9. The renewal application for your NPDES permit was to have been submitted by May 1, 20ll. The plant is currently in violation of State and Federal Regulations for discharging without an NPDES permit. The renewal application must be submitted as quickly as possible so that the permit can be renewed. All outstanding violations must be resolved to reissue the permit. Failure to submit the renewal application in the by January 18, 2012, will result a referral to our legal staff for enforcement.

10. Inspection photos are attached.

By January 18, 2012 please respond in writing what your proposed course of action will be to correct the above deficiencies. The letter needs to include a time frame to complete the above listed modifications to the WWTP.

You may contact this office at (330) 963-1193 to discuss any questions you may have.

Respectfully,

Joseph E. Trocchio

Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/cs

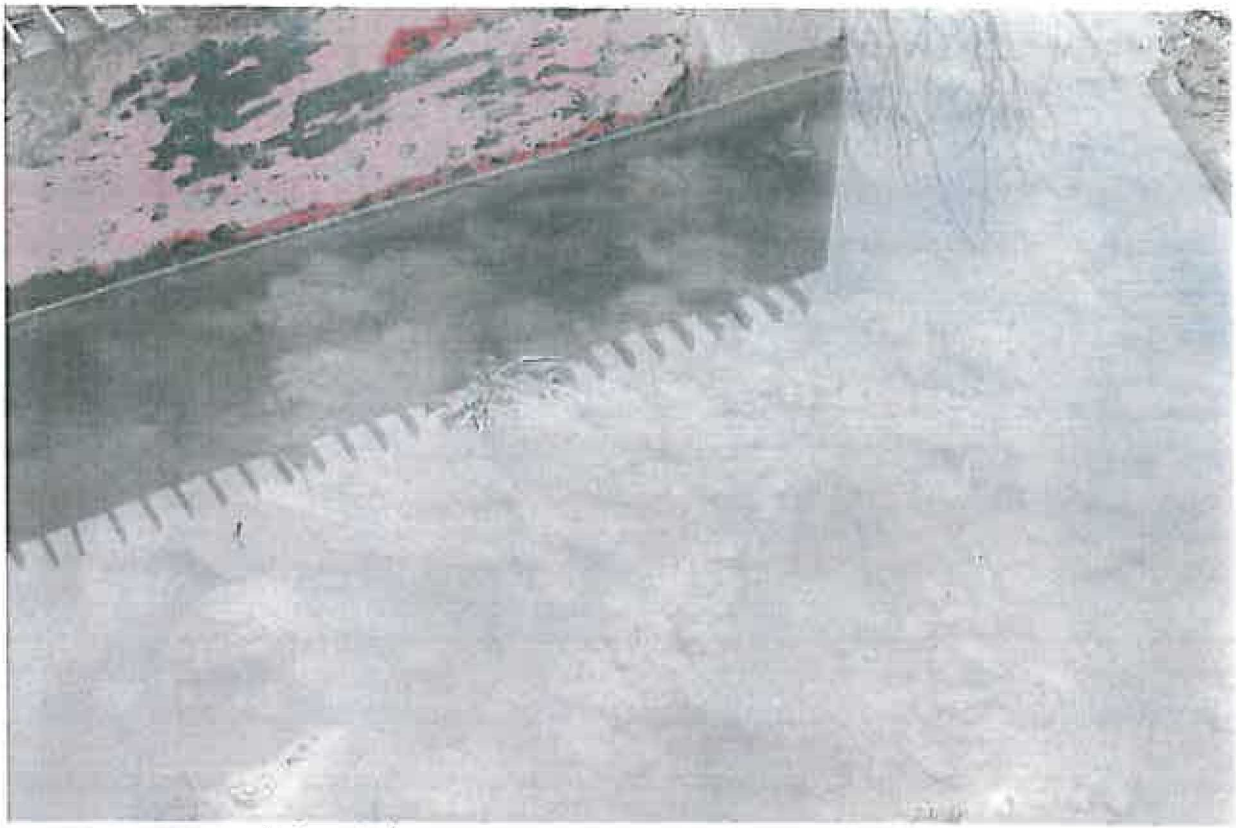
cc: Lori Barnes, Columbiana County Health Dept.

File: Semipublic/Columbiana County/West Township/Town and Country MHP

Town and Country MHP Compliance Evaluation Inspection

Both Filters Covered in Solids and in need of Cleaning.

The south filter has an unauthorized discharge to waters of the State of Ohio.



Untreated Sewage is discharging across the ground.

The plant was not operational, grey and septic.

Both filters need cleaned and replacement sand installed.

TOWN AND COUNTRY MHP EFFLUENT VIOLATIONS: APR. 2008 - NOV. 2011

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00124*AD	June 2008	Fecal Coliform	30D Conc	1000	2400.	6/1/2008
3PV00124*AD	June 2008	Fecal Coliform	7D Conc	2000	2400.	6/22/2008
3PV00124*AD	June 2008	Dissolved Oxygen	1D Conc	6.0	5.2	6/25/2008
3PV00124*AD	June 2009	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.1	6/1/2009
3PV00124*AD	June 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.04224	6/1/2009
3PV00124*AD	June 2009	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.1	6/22/2009
3PV00124*AD	June 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.0284	.04224	6/22/2009
3PV00124*AD	June 2009	Dissolved Oxygen	1D Conc	6.0	2.6	6/23/2009
3PV00124*AD	August 2009	Nitrogen, Ammonia (NH3)	30D Conc	1.0	13.	8/1/2009
3PV00124*AD	August 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.17714	8/1/2009
3PV00124*AD	August 2009	Nitrogen, Ammonia (NH3)	7D Conc	1.5	13.	8/15/2009
3PV00124*AD	August 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.0284	.17714	8/15/2009
3PV00124*AD	August 2009	Dissolved Oxygen	1D Conc	6.0	4.2	8/21/2009
3PV00124*AD	December 2009	Nitrogen, Ammonia (NH3)	30D Conc	3.0	15.	12/1/2009
3PV00124*AD	December 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.0568	.20439	12/1/2009
3PV00124*AD	December 2009	Nitrogen, Ammonia (NH3)	7D Conc	4.5	15.	12/8/2009
3PV00124*AD	December 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.0852	.20439	12/8/2009
3PV00124*AD	March 2010	Dissolved Oxygen	1D Conc	6.0	4.9	3/25/2010
3PV00124*AD	June 2010	Total Suspended Solids	30D Conc	12	40.	6/1/2010
3PV00124*AD	June 2010	Total Suspended Solids	7D Conc	18	40.	6/1/2010
3PV00124*AD	June 2010	Total Suspended Solids	30D Qty	0.228	.54504	6/1/2010
3PV00124*AD	June 2010	Total Suspended Solids	7D Qty	0.341	.54504	6/1/2010
3PV00124*AD	June 2010	Dissolved Oxygen	1D Conc	6.0	3.1	6/22/2010
3PV00124*AD	August 2010	Total Suspended Solids	30D Conc	12	16.	8/1/2010
3PV00124*AD	August 2010	Dissolved Oxygen	1D Conc	6.0	5.6	8/24/2010
3PV00124*AD	June 2011	Nitrogen, Ammonia (NH3)	30D Conc	1.0	28.	6/1/2011
3PV00124*AD	June 2011	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.38153	6/1/2011
3PV00124*AD	June 2011	Fecal Coliform	30D Conc	1000	2800.	6/1/2011
3PV00124*AD	June 2011	Nitrogen, Ammonia (NH3)	7D Conc	1.5	28.	6/8/2011
3PV00124*AD	June 2011	Nitrogen, Ammonia (NH3)	7D Qty	0.0284	.38153	6/8/2011
3PV00124*AD	June 2011	Fecal Coliform	7D Conc	2000	2800.	6/8/2011
3PV00124*AD	June 2011	Dissolved Oxygen	1D Conc	6.0	1.7	6/12/2011
3PV00124*AD	August 2011	Nitrogen, Ammonia (NH3)	30D Conc	1.0	15.	8/1/2011
3PV00124*AD	August 2011	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.20439	8/1/2011
3PV00124*AD	August 2011	Chlorine, Total Residu	1D Conc	.019	1.2	8/30/2011
3PV00124*AD	August 2011	Dissolved Oxygen	1D Conc	6.0	4.1	8/30/2011