

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO E.P.A.
NOV 12 2014

In the Matter of:

Timothy Adkins :
d.b.a. DFC Mobile Home Park and Sales :
1600 Lenox New-Lyme Road :
Jefferson, OH 44047 :

Director's Final Findings
and Orders

Respondent

I certify this to be a true and accurate copy of the
official documents as filed in the records of the Ohio
Environmental Protection Agency.

PREAMBLE

It is agreed by the Parties hereto as follows:

By: [Signature] Date: 11-12-14

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to Timothy Adkins d.b.a. DFC Mobile Home Park and Sales ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 6111.03, 6109.04, and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in the ownership of the Facility described in Finding No. 1 of these Orders shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapters 6109 and 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA (Director) has made the following findings:

1. Respondent owns and operates the DFC Mobile Home Park and Sales located at 1600 Lenox New Lyme Road, Jefferson, Ashtabula County, Ohio 44047 ("Facility"). The Facility has approximately 47 lots, 51 service connections, and a current population of 85.

2. The Facility was sold to Respondent on or about December 31, 2013.

Public Water System

3. To serve the Facility, Respondent owns and operates a "public water system" ("PWS") as defined by ORC § 6109.01, which is also a "community water system" as defined by Ohio Administrative Code (OAC) Rule 3745-81-01.
4. Respondent's PWS (PWS ID# OH0400512) obtains its drinking water from a "groundwater" source as defined by OAC Rule 3745-81-01, and serves a population of 85 persons.
5. In accordance with OAC Rules 3745-96-01 through 3745-96-04, annually by July first, each community water system shall provide to the Director the following information:
 - a. A copy of the Consumer Confidence Report (CCR) for the previous calendar year; and
 - b. A distribution certification, on a form acceptable to the Director, certifying that the report has been distributed to customers, a good faith effort to reach non-bill paying customers has been completed, and that the information is correct and consistent with the compliance monitoring data previously submitted to the Director.
6. In violation of OAC Rules 3745-96-01 through 04, the previous owner failed to prepare and mail or otherwise directly deliver the 2007, 2008 and 2012 CCR to each customer and failed to provide a copy of this CCR and the distribution certification form to Ohio EPA by July 1, 2008, July 1, 2009 and July 1, 2012, respectively. On October 15, 2012, the previous owner distributed the 2011 CCR.
7. In violation of OAC Rules 3745-96-01 through 04, the Respondent failed to prepare and mail or otherwise directly deliver the 2013 CCR to each customer and failed to provide a copy of this CCR and the distribution certification form to Ohio EPA by July 1, 2014.
8. In January 2010, US EPA issued an Administrative Order to the previous owner for the failure to complete and distribute a CCR for 2007.
9. In accordance with OAC Rule 3745-81-21(A)(1)(a), a community water system using ground water and serving not more than one thousand (1000) persons

shall monitor with at least one total coliform bacteria sample each month.

10. In violation of OAC Rule 3745-81-21(A)(1)(a), Respondent or the previous owner failed to collect at least one total coliform bacteria sample during the months of June 2007, January 2008, July 2008, March 2009, June 2011, November 2013, December 2013, January 2014, March 2014, and July 2014.
11. In accordance with OAC Rule 3745-81-14(B), a PWS which monitors with fewer than forty (40) samples per month is in compliance with the maximum contaminant level (MCL) for total coliform when no more than one sample during a month is total coliform positive.
12. In violation of OAC Rule 3745-81-14(B), the previous owner exceeded the total coliform MCL in February 2009 when more than one total coliform-positive sample was taken.
13. In accordance with OAC Rule 3745-81-21(B)(1), when a routine sample is determined to be total coliform-positive, the PWS shall monitor with a set of four repeat samples within twenty-four hours of being notified of the positive result.
14. In violation of OAC Rule 3745-81-21(B)(1), the previous owner failed to collect at least four repeat samples within the required time period following a total coliform-positive result during June 2008.
15. In accordance with OAC Rule 3745-81-23(B), PWSs shall monitor to determine compliance with the MCL for nitrate according to a schedule provided by the Director.
16. During December 2008, the Director issued a chemical contaminant monitoring schedule to the previous owner (2009 monitoring schedule) for the compliance period that began on January 1, 2009 and ended December 31, 2009. Pursuant to the 2009 monitoring schedule, the previous owner was required to monitor with one nitrate sample quarterly during the 2009 monitoring period. During December 2013, the Director issued a chemical contaminant monitoring schedule to the previous owner (2014 monitoring schedule) for the compliance period that began on January 1, 2014 and ends December 31, 2014. Pursuant to the 2014 monitoring schedule, Respondent was required to monitor with one nitrate sample during the January 1 through March 31, 2014 (1st Quarter) monitoring period.
17. In violation of OAC Rule 3745-81-23(B) and the 2009 monitoring schedule, the previous owner failed to monitor for nitrate during the January 1 through March 31, 2009 (1st Quarter) monitoring period. The previous owner returned to

compliance for the monitoring violation by sampling for nitrate on April 9, 2009.

18. In violation of OAC Rule 3745-81-23(B) and the 2014 monitoring schedule, Respondent failed to monitor for nitrate during the January 1 through March 31, 2014 monitoring period.
19. In accordance with OAC Rule 3745-81-42(A)(2), within twenty-four hours of notification of a total coliform-positive sample, a ground water system shall collect at least one ground water source sample from each ground water source in use at the time the total coliform-positive sample was collected.
20. In accordance with OAC Rule 3745-81-42(A)(2)(b), PWSs with more than one ground water source may meet the requirements of paragraph (A)(2) of this rule by collecting a representative sample(s) from location(s) acceptable to the Director. PWSs shall submit a triggered source water monitoring plan acceptable to the Director that identifies one or more sample locations that are representative of each monitoring site in the system's sample siting plan and that the system intends to use for representative sampling.
21. In violation of OAC Rule 3745-81-42(A)(2) & (A)(2)(b), the previous owner failed to collect a ground water source sample from each groundwater source in use for the routine total coliform-positive sample on September 15, 2011. The groundwater sample that was collected was a composite sample taken from the raw water storage tank. The previous owner was required to submit one ground water source sample from each well in use at the time the total coliform-positive sample was collected or submit a triggered source water monitoring plan acceptable to the Director that identifies one or more sampling locations that are representative of each monitoring site in the system's sample siting plan.
22. In accordance with OAC Rule 3745-81-86(D)(4), a small system that does not exceed the lead or copper action level during three consecutive years of monitoring may reduce the number of samples and reduce the frequency of sampling to once every three years.
23. During December 2009, the Director issued a chemical contaminant monitoring schedule to the previous owner (2010 monitoring schedule) for the compliance period of January 1, 2010 through December 31, 2010 that required the previous owner to collect five lead and copper samples between June 1 and September 30, 2010.
24. In violation of OAC Rule 3745-81-86(D)(4) and the previous owner's 2010 monitoring schedule, the previous owner failed to collect the triennial lead and copper monitoring samples during June 1 through September 30, 2010

- monitoring period. The previous owner returned to compliance for the monitoring violation by sampling for lead and copper on September 15, 2011.
25. In accordance with OAC Rule 3745-81-24(C)(1), groundwater community PWSs with a population < 10,000 that treat their water with chlorine shall monitor for total trihalomethanes (TTHM) and haloacetic acids five (HAA5) with one sample per year during the month of warmest water temperature.
 26. During December 2007, the Director issued a chemical contaminant monitoring schedule to the previous owner (2008 monitoring schedule) for the compliance period of January 1, 2008 through December 31, 2008 that required the previous owner to collect HAA5 and TTHM samples between July 1, 2008 and September 30, 2008. During December 2012, the Director issued a chemical contaminant monitoring schedule to the previous owner (2013 monitoring schedule) for the compliance period of January 1, 2013 through December 31, 2013 that required the previous owner to collect HAA5 and TTHM samples between July 1, 2013 and September 30, 2013.
 27. In violation of OAC Rule 3745-81-24(C), the previous owner failed to monitor for TTHM and HAA5 during the monitoring periods of July 1 through September 30, 2008 and July 1 through September 30, 2013. The previous owner returned to compliance for the 2008 monitoring violation by sampling for TTHM and HAA5 on November 2, 2010.
 28. In accordance with OAC Rule 3745-81-24(A), community water systems shall monitor for volatile organic chemicals (VOCs) with MCLs listed in OAC Rule 3745-81-12(D). PWSs shall monitor for VOCs according to the schedule provided by the Director.
 29. In violation of OAC Rule 3745-81-24(A) and the 2008 monitoring schedule, the previous owner failed to monitor for VOCs during the January 1 to March 31, 2008 monitoring period. The previous owner returned to compliance for the monitoring violation by sampling for VOCs on March 29, 2011.
 30. In violation of OAC Rule 3745-81-24(A) and the 2014 monitoring schedule, Respondent failed to monitor for VOCs during the January 1 to March 31, 2014 monitoring period.
 31. In accordance with OAC Rule 3745-81-32, the owner or operator of a PWS shall provide public notification for violations and submit copies of the required public notice and verification forms to the Director.
 32. In violation of OAC Rule 3745-81-32, the previous owner failed to issue public

notification and submit copies of the required public notices and verification forms in a timely manner for:

- a. failing to routinely monitor for total coliform bacteria during the monitoring periods of June 2007, January 2008, July 2008, March 2009, and June 2011;
- b. violating the MCL for total coliform during the February 2009 monitoring period;
- c. failing to monitor and report required repeat total coliform samples during the June 2008 monitoring period;
- d. failing to monitor for nitrate during the January 1 to March 31, 2009 monitoring period;
- e. failing to conduct lead and copper triennial monitoring during the 2010 monitoring period;
- f. failing to monitor for TTHM and HAA5 during the July 1 to September 30, 2008 monitoring period; and,
- g. failing to monitor for VOCs during the January 1 to March 31, 2008 monitoring period.

Respondent issued a combined public notice for all of the violations cited above on March 26, 2014 and submitted a copy of the public notice and verification form to the Ohio EPA on March 27, 2014.

33. In accordance with OAC Rule 3745-7-02(A)(1), each person owning or operating a PWS shall designate one or more operator of record to oversee the technical operation of the PWS. Each operator of record shall have a valid certification of a class equal to or greater than the classification of the PWS.
34. In violation of OAC Rule 3745-7-02(A)(1), PWS failed to designate a Class A certified operator or higher from at least January 7, 2009 to approximately July 18, 2014.
35. In accordance with ORC § 6109.12, every owner or operator of a PWS shall have analyses of the water made at such intervals and in such manner as may be ordered by Ohio EPA. Records of the results of such analyses shall be maintained and reported as required by Ohio EPA.

36. In accordance with OAC Rule 3745-83-01(I)(1), the owner or operator of a PWS shall prepare an operation report for each month of operation on forms acceptable to the Director.
37. In accordance with OAC Rule 3745-83-01(I)(2), the monthly operating report (MOR) shall be signed by the operator of record, designated in accordance with OAC Rule 3745-7-02, and submitted to the district office no later than the tenth of the month following the month for which the report was prepared. An October 31, 2011 letter from Ohio EPA, summarizing findings of a sanitary survey conducted on October 6, 2011, specifically reminded the previous owner to submit MORs.
38. In violation of OAC Rule 3745-83-01(I)(1) and (I)(2), Respondent or the previous owner failed to submit signed MORs to Ohio EPA by the tenth day of the month for the following months: January 2011, February 2011, March 2011, April 2011, May 2011, June 2011, July 2011, August 2011, September 2011, January 2012, February 2012, June 2012, and July 2012, August 2012, October 2012, November 2012, December 2012, January 2013, February 2013, March 2013, April 2013, May 2013, June 2013, August 2013, September 2013, October 2013, November 2013, December 2013, January 2014, February 2014, March 2014, April 2014, May 2014, June 2014, July 2014, and August 2014.
39. In accordance with OAC Rule 3745-83-01(C)(1), all community PWSs shall maintain a minimum chlorine residual of at least two-tenths milligram per liter (mg/L) free chlorine or one mg/L combined chlorine measured at representative points throughout the distribution system.
40. In accordance with OAC Rule 3745-83-01(C)(2), all PWSs subject to paragraph (C)(1) of this rule shall install and place in operation equipment capable of meeting disinfection requirements of this rule.
41. In violation of OAC Rule 3745-83-01(C)(1), the previous owner failed to maintain the required free or combined chlorine residual on August 23, 2011 and October 6, 2011, as measured by Ohio EPA staff.
42. On October 31, 2011, Ohio EPA mailed the previous owner a letter identifying significant deficiencies observed at the previous owner's PWS during the October 6, 2011 sanitary survey. A follow-up letter dated April 26, 2012, reiterated these concerns and was sent via certified mail. These deficiencies included, but were not limited to, the following:
 - a. The 4,000 gallon underground raw water storage tank was required to be inspected by a qualified professional and corrections made to

any deficiencies identified. The inspection report was required to be submitted to the Ohio EPA, along with detail plans for any necessary repairs and/or replacement of the raw water storage tank by November 1, 2011. The April 26, 2012 letter required corrective actions within 30 days. The previous owner failed to provide required information. Consequently, a treatment technique violation letter was sent to the previous owner by certified mail on July 12, 2012.

- b. The previous owner did not routinely utilize a DPD colorimetric chlorine test kit with a digital display and minimum detection limit of 0.1mg/L to determine free and combined chlorine residual daily per OAC Rule 3745-81-27(C)(1)(a).
- c. The previous owner had failed to measure chlorine residuals daily at the entry point and at a site in the distribution system per OAC Rule 3745-83-01 (F)(2).
- d. The PWS is required to maintain daily operation and maintenance records by the Class A operator per OAC Rule 3745-7-09. Respondent does not have a Class A Operator.
- e. The PWS is required to collect total coliform bacteria samples in accordance with its written total coliform sample siting plan per OAC Rule 3745-81-21. PWS does not have a sample siting plan on file with Ohio EPA.
- f. A copy of the contingency plan for the PWS was not available for inspection. Community PWSs are required to prepare and maintain a written contingency plan for providing safe water to its service area under emergency conditions. This plan is to be available for inspection, and updated and revised as necessary, but at least annually per OAC Rule 3745-85-01. Respondent does not have a contingency plan.
- g. The previous owner had not performed the public notifications cited in Finding No. 31.
- h. The previous owner had not submitted the MORs prior to August 2012 as cited in Finding No. 37.
- i. The previous owner had failed to maintain adequate chlorine residuals in the distribution system.

43. Each violation cited above represents a separate violation of ORC § 6109.31.

Wastewater Treatment Plant

44. The Facility is currently served by a wastewater treatment plant ("WWTP") which consists of a trash trap, 12,000 gallon equalization basin, a 9,000 gallon per day extended aeration plant with clarification, dosing tank, surface sand filtration, chlorine disinfection, and dechlorination. The WWTP discharges "sewage," "industrial waste," and/or "other wastes," as defined in ORC § 6111.01, to Cemetery Creek. Cemetery Creek is "waters of the state" as defined in ORC section 6111.01.
45. The previous owner was issued Ohio National Pollutant Discharge Elimination System ("NPDES") permit No. 3PV00081*CD for the discharge from the Facility. The permit became effective January 2, 2007 and expired December 31, 2011. A permit renewal application was submitted on August 10, 2012.
46. On April 16, 2014, Respondent submitted an NPDES permit transfer form with an effective date of May 1, 2014. However, because NPDES permit No. 3PV00081*CD had expired and the renewal application was not submitted timely, a new permit application was required. Respondent submitted a new NPDES permit application in May 2014.
47. The NPDES permit included a schedule of compliance that required the previous owner to evaluate the Facility's collection system to determine sources or causes of excessive inflow and infiltration and submit a report detailing the results of the evaluation, actions taken to improve compliance, recommendations for further actions and/or improvements necessary to enhance treatment performance and a schedule for implementation of any additional actions and/or improvements (hereinafter "I & I report") by July 2, 2007. However, to the present date the previous owner and Respondent have failed to comply with this requirement.
48. Ohio EPA conducted inspections of the Facility for compliance with the previous owner's NPDES permit and ORC Chapter 6111 and rules adopted thereunder on April 19, 2007, November 19, 2008, September 9, 2009, November 3, 2010, and November 28, 2011 October 22, 2012, September 18, 2013, and March 26, 2014.
49. Following the inspections listed in Finding No. 43, Ohio EPA sent notices of violations ("NOVs") or letters enumerating violations to the previous owner on

May 2, 2007, December 18, 2008, October 13, 2009, November 8, 2010, and November 29, 2011, October 23, 2012, September 23, 2013, and April 17, 2014.

50. Violations noted in the NOVs and letters included operational problems at the WWTP (NOVs or letters dated May 2, 2007, December 18, 2008, October 13, 2009, November 29, 2011, September 23, 2013), violations of effluent limitations in the previous owner's NPDES permit (NOVs or letters dated May 2, 2007, December 18, 2008, October 13, 2009, November 8, 2010, November 29, 2011, October 23, 2012, September 23, 2013, and April 17, 2014), violations of sampling and/or reporting requirements in the previous owner's NPDES permit (NOVs or letters dated May 2, 2007, December 18, 2008, October 13, 2009, November 8, 2010, September 23, 2013, October 23, 2012, April 17, 2014), failure to submit annual sludge reports (NOV dated November 29, 2011, October 23, 2012, September 23, 2013, and April 17, 2014), failure to submit the I & I report (NOVs or letters dated December 18, 2008, October 13, 2009, November 29, 2011, October 23, 2012, April 17, 2014), and failure to have a certified operator of record or lack of staffing (NOVs or letters dated November 8, 2010, November 29, 2011, October 23, 2012, September 23, 2013, and April 17, 2014).
51. An NOV was sent to the previous owner on August 5, 2010, noting that the Facility was in significant noncompliance ("SNC") for violations of the effluent limitation in the previous owner's NPDES permit for nitrogen ammonia, and for failure to submit the I & I report as required by the compliance schedule in the previous owner's NPDES permit.
52. An NOV was sent to the previous owner on October 18, 2010 for failure to submit the I & I report.
53. An NOV was sent to the previous owner on October 19, 2011, noting that the Facility was in SNC for nitrogen ammonia effluent limitation violations and for failure to have a certified operator of record.
54. An NOV was sent to the previous owner on November 28, 2011, noting that the Facility was in SNC for nitrogen ammonia effluent limitation violations, and noting failure to have a certified operator of record, and failure to submit the I & I report.
55. An NOV was sent to the previous owner on August 12, 2013 regarding failure to submit eDMR data.
56. The previous owner sent correspondence to Ohio EPA dated March 12, 2008, December 28, 2008, November 17, 2009, October 27, 2010, November 29, 2010, and December 2, 2011. The March 12, 2008, December 28, 2008, and November 17, 2009 communications noted problems the previous owner was

having with eDMR submissions, and the October 27, 2010 and November 29, 2010 communications described repairs the previous owner had made to the sand beds at the WWTP. The December 2, 2011 communication described steps to abate ongoing violations and the previous owner expressed interest in having her employees become certified operators for the facility.

57. Pursuant to ORC § 6111.04(A), no person shall place or discharge, or cause to be placed or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes without a valid, unexpired permit.
58. Pursuant to ORC § 6111.04(C), no person to whom a permit has been issued shall place or discharge, or cause to be placed or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit.
59. Pursuant to ORC Section 6111.07(A), no person shall violate or fail to perform any duty imposed by sections 6111.01 to 6111.08 of the Revised Code or violate any order, rule, or term or condition of a permit issued or adopted by the director of environmental protection pursuant to those sections. Each day of violation is a separate offense.
60. In accordance with Ohio Administrative Code ("OAC") 3745-33-02(A), no person may discharge any pollutant or cause, permit, or allow a discharge of any pollutant without applying for and obtaining an Ohio NPDES permit. Pursuant to OAC 3745-33-04, NPDES permit renewal applications must be submitted at least one hundred and eighty days prior to expiration of the permit.
61. The previous owner failed to submit an application for renewal of the NPDES permit for the Facility by June 30, 2011, and failed to submit a renewal application until August 10, 2012, in violation of OAC 3745-33-04 and ORC § 6111.07.
62. On July 11, 2014, Ohio EPA received an Operator of Record Notification form from Respondent for contract operators of the WWTP.
63. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the permit to install ("PTI") requirements of ORC §§ 6111.44 and 6111.45 and OAC Chapter 3745-42.
64. This document does not modify NPDES permit No. 3PV00081*CD, nor does it constitute a new NPDES permit. The purpose of these Orders is to correct

Respondent's and the previous owner's noncompliance with permit No. 3PV00081*CD.

65. Compliance with ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.
66. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the state to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

V. ORDERS

Public Water System

1. Respondent shall comply with all current and future monitoring schedules for the PWS issued by the Director.
2. Respondent shall comply with total coliform bacteria monitoring and MCL requirements, in accordance with OAC Rules 3745-81-21 and 3745-81-14, respectively.
3. Respondent shall annually, by July first, provide to customers a CCR containing data collected during or prior to the previous calendar year, and provide a copy of the CCR distributed and a distribution certification to the Director in accordance with OAC Chapter 3745-96.
4. Respondent shall immediately issue public notification and submit copies of the required public notice and verification form to the Ohio EPA, Division of Drinking and Ground Waters (DDAGW), Central Office (CO), Lazarus Government Center, P.O. Box 1049, Columbus, Ohio 43216-1049, Attn: Mark Sheahan, in accordance with OAC Rule 3745-81-32, for:
 - a. failing to routinely monitor for total coliform bacteria during the monitoring periods of March 2014;
 - b. failing to monitor for nitrate during the January 1 to March 31, 2014 monitoring period;
5. Respondent shall issue public notices for all violations in accordance with OAC

Rule 3745-81-32.

6. Respondent shall comply with OAC Rule 3745-7-02(A)(1), by ensuring an operator of record with a valid Class A certification or above is designated to oversee the technical operation of the PWS. In the event of a change in the operator of record, Respondent shall notify Ohio EPA within three (3) days of the change.
7. Respondent shall comply with OAC Rule 3745-7-09, by maintaining daily operation and maintenance records by the Class A Operator.
8. Respondent shall prepare a MOR for each month of operation in a format acceptable to the Director, and the MORs shall be signed by the operator of record and submitted to the Ohio EPA no later than the tenth of the month following the month for which the reports were prepared, in accordance with OAC Rule 3745-83-01.
9. Respondent shall maintain a minimum chlorine residual of at least two-tenths mg/L free chlorine or one mg/L combined chlorine measured at representative points throughout the distribution system, in accordance with OAC Rule 3745-83-01(C)(1).
10. Respondent shall monitor for free and combined chlorine residual at least once each day that the water is available to the public at the entry point and at a representative point in the distribution system, in accordance with OAC Rule 3745-83-01(F)(2).
11. Within thirty (30) days of the effective date of these Orders, Respondent shall address the significant deficiency identified during the September 1, 2011 sanitary survey by submitting approvable detail plans for the new underground storage tank and associated equipment in accordance with Ohio EPA's detail plan comment letter dated April 16, 2014. Approvable detail plans should be submitted to Mr. Len Rychlik, PE, at the Northeast District Office.
12. Respondent shall use a digital DPD chlorine test kit with a detection limit of 0.1 mg/L for the measurement of chlorine residuals in accordance with OAC Rule 3745-81-27(C)(1)(a).
13. Respondent shall immediately submit a written total coliform sample siting plan per OAC Rule 3745-81-21 and shall prepare and maintain a written contingency plan for providing safe water to its service area under emergency conditions in accordance with OAC Rule 3745-85-01 to the address listed in Order No. 11.

14. Within sixty (60) days from the effective date of these Orders, Respondent shall install a means to sample individual wells. A raw water sample tap could be installed on each active wellhead or shared piping could be used if there is a means to isolate and purge the piping accordingly.

Wastewater Treatment Plant

15. Respondent shall comply with OAC Rule 3745-7-02(A)(2), by ensuring an operator of record with a valid Class 1 certification or above is employed or under contract to oversee the technical operation of the WWTP. In the event of a change in the operator of record, Respondent shall notify Ohio EPA, in accordance with Section X. of these Orders, within three (3) days of the change.
16. Upon the effective date of these Orders, Respondent shall immediately commence submitting monthly discharge monitoring reports in accordance with NPDES permit No. 3PV00081*ED.
17. Respondent shall achieve compliance with the final effluent limitations in NPDES permit No. 3PV00081*ED, and any successor permit, by taking the following actions as expeditiously as practicable, but not later than the following schedule:
 - a. Upon the earlier of the effective date of NPDES permit No. 3PV00081*ED or the effective date of these Orders, Respondent shall immediately commence the following evaluations which shall be conducted by a licensed WWTP operator or a professional engineer:
 - i. An evaluation of the sanitary sewer collection system which includes, but is not limited to, determining the sources or causes of excessive inflow and infiltration (I/I);
 - ii. An evaluation of whether the WWTP is able to meet the final effluent limitations in NPDES permit No. 3PV00081*ED under its current operating condition.
 - b. By July 15, 2015, Respondent shall submit to Ohio EPA for concurrence, in accordance with Section X. of these Orders, a report on the results of the evaluations of the Facility's existing WWTP and sanitary sewer collection system required by Order 17(a). The report shall include recommended actions for eliminating I/I and any other proposed improvements to the collection system, all recommended WWTP improvements

necessary to achieve and maintain consistent compliance with the effluent limitations in NPDES permit No. 3PV00081*ED and any successor permit, and a schedule for implementing the recommended actions and improvements for both the collection system and WWTP.

- c. Within fourteen (14) days of receipt of notification of comments or deficiencies from Ohio EPA on the report required by Order 17(b), Respondent shall provide to Ohio EPA, in accordance with Section X. of these Orders, a response with all necessary revisions to address the comments or deficiencies.
 - d. Upon Ohio EPA's concurrence with the report, Respondent shall implement the actions and improvements recommended in the report that do not require a PTI from Ohio EPA in accordance with the schedule included in the report;
 - e. By September 1, 2015, Respondent shall submit to Ohio EPA, in accordance with Section X. of these Orders, approvable detailed plans and a complete PTI application for any necessary WWTP or sanitary sewer collection system improvements that require a PTI from Ohio EPA.
 - f. Within fourteen (14) days of receipt of notification of comments or deficiencies from Ohio EPA on the PTI required by Order 17(e), Respondent shall provide to Ohio EPA, in accordance with Section X. of these Orders, a revised PTI application and detailed plans addressing the comments or deficiencies.
 - g. By July 1, 2016, Respondent shall complete construction of any approved WWTP and sanitary sewer collection system improvements in accordance with the approved PTI, and achieve compliance with the final effluent limitations in NPDES permit No. 3PV00081*ED or any successor permit.
 - h. Within seven (7) days of completion of Orders 17.d. and 17.g., Respondent shall notify Ohio EPA in accordance with Section X. of these Orders.
18. Within thirty (30) days of the effective date of these Orders, Respondent shall submit the 2010, 2011, 2012, and 2013 Annual Sludge Reports, and shall thereafter submit Annual Sludge Reports as required by NPDES permit No. 3PV00081*ED or any successor permit.

19. Respondent shall comply with the terms and conditions of NPDES permit No. 3PV00081*ED and any successor permits.

VI. TERMINATION

Respondent's obligations under Orders Nos. 1-14 shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Drinking and Ground Water, acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

Respondent's obligations under Orders Nos. 15-19 shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water, acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

This certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(E).

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the Respondent's Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to the Respondent.

IX. MODIFICATIONS

These Orders may be modified by the agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required by Orders Nos. 1-14 to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio EPA, Northeast District Office
Attn: DDAGW District Office Compliance Coordinator
2110 E. Aurora Road
Twinsburg, OH 44087

All documents required by Orders Nos. 15-19 to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio EPA, Northeast District Office
Attn: DSW Enforcement Unit Supervisor
2110 E. Aurora Road
Twinsburg, OH 44087

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only those violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

OCT 17 2014

RECEIVED

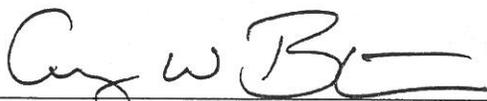
Timothy Adkins d.b.a. DFC Mobile Home Park and Sales
Director's Final Findings and Orders
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XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency



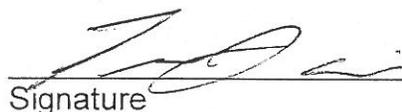
Craig W. Butler
Director

NOV 12 2014

Date

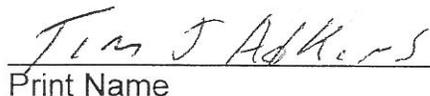
IT IS SO AGREED:

**Timothy Adkins dba DFC Mobile Home Park
and Sales**


Signature

10-12-14

Date


Print Name

Owner
Title

