



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
[www.epa.state.oh.us](http://www.epa.state.oh.us)

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049



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HAMILTON WESTBROOK VILLAGE MHP

OSIKA, MARY

2010/05/19

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

May 19, 2010

Mr. Lanny Holbrook, President  
Heritage Management Group, Inc.  
1400 Fourth and Race Tower  
105 West Fourth Street  
Cincinnati, Ohio 45202

RE: Westbrook Village Mobile Home Park  
Compton Hills Mobile Home Park  
Notice of Violation

Dear Mr. Holbrook:

I have received no response to my letters to you dated February 3 and March 17, 2010 regarding sewage issues at Westbrook Village and Compton Hills Mobile Home Parks. Since the date of my last letter, further violations have been documented at both mobile home parks regarding sewage overflows that have been a risk to human health and the environment. The following incidents have been documented by the Hamilton County Public Health Department:

<u>Date of Complaint</u>	<u>Complaint address</u>	<u>Nature of Complaint</u>
April 1, 2010	9091 Crossridge Dr.	Sewage overflow onto ground
April 7, 2010	2820 Windy Way	Sewage overflow onto ground
April 12, 2010	2836 Topview Place	Sewage overflow onto ground
May 5, 2010	5808 Meadow Valley	Sewage overflow onto ground
May 14, 2010	Westbrook sewage treatment plant	Security fence down for water line work- safety issue

The sewer overflows documented above are considered a violation of Ohio Revised Code section 6111 and the NPDES permit covering the Westbrook Mobile Home Park. The sewer overflow documented at the Westbrook site on Meadow Valley was not reported to Ohio EPA as previously requested in my letters to you on February 3 and March 17, 2010.

The sewer overflows that occurred at the Compton Hills Mobile Home Park were properly reported to me by Larry Hughes, Manager of Compton Hills.

The chronic nature of sewer overflows occurring in these mobile home parks, violations of the NPDES permit at Westbrook Village Mobile home park, as well as violations of the findings and orders issued to Heritage by this agency on December 30, 2005, have resulted in my recommendation for legal enforcement action in order to abate the sewer overflows and violations of the NPDES permit.



Lanny Holbrook, Heritage Management Group, Inc.

May 19, 2010

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I have had recent discussions with Karen Taylor and Marge Flemming concerning the lack of response regarding Westbrook Village Mobile Home Park sewage issues. I would like to work with these people to try to quickly resolve the sewage overflows and treatment plant violations.

To summarize the issues at Westbrook, every sewage overflow event must be reported to Ohio EPA and then followed up by a letter or report documenting what happened and what corrective action was taken.

To reiterate an issue I brought up in my February 3, 2010 letter to you, your maintenance staff or plumbers should be prepared to capture all sewage from resident's lateral lines if they suspect a clog and are there to fix it. Past practice has been to allow the sewage to be discharged onto the ground either under or around a resident's home. This practice needs to be corrected. Discuss this issue with your managers, maintenance staff and plumbing contractors. A response is requested concerning this issue.

There has been a pattern of chlorine residual violations of the NPDES permit at Westbrook. We are into another disinfection season and I will need to know how this issue will be corrected. All permit violations need to be responded to as stated in the non-compliance notification requirements of the NPDES permit. This has not been occurring in the past.

Although I cannot directly address another issue regarding the broken water lines in the Westbrook Village mobile home park, this issue may be contributing clean water to the sewer system and causing treatment plant maintenance issues with overloading your settling tanks which then causes sand filters to clog/flood. Please discuss how you are handling the repairs of the water lines.

I am making this recommendation to you as well as in my recommended legal enforcement action, that both mobile home parks have a sewer system evaluation done to determine the amount of cleaning and other rehabilitation work needed to minimize the sewer overflow problems. Regular, scheduled sewer system cleaning is recommended as proper maintenance. This will also minimize the chance and occurrence of sewer overflows.

Again, I request that you respond to this letter that summarizes issues raised in my previous two letters as well as more recent violations that have been brought to my attention by the Hamilton County Public Health Department. A response is requested by June 2, 2010.



Lanny Holbrook, Heritage Management Group, Inc.  
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If you have any questions regarding this letter, you may contact me at (937) 285-6101.

Sincerely,



Mary Osika  
Environmental Specialist  
Division of Surface Water

ec: Greg Kesterman, Hamilton County Public Health  
Greg Cassiere, Hamilton County Public Health  
Marge Flemming, Heritage Management  
Bob Reckers, Winelco  
Melodi Clark, Ohio EPA, DSW

cc: Karen Taylor, Westbrook Village Mobile Home Park  
Larry Hughes, Compton Hills Mobile Home Park

