



**Environmental
Protection Agency**

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



1PR0000220091026

BUTLER

BROWN'S RUN COUNTRY CLUB

SARLE, EDWARD

2009/10/26



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

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

October 26, 2009

Mr. David Baril
Brown's Run Country Club
6855 Sloebig Road
Middletown, Ohio 45042

Re: Butler County, Brown's Run Country Club, Compliance Evaluation Inspection

Dear Mr. Baril:

On October 13, 2009, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0085669; OEPA Permit No. 1PR00002*BD). Representing this facility was Greg Martin, Mike Harris, Ray Maggard and you. A copy of my inspection report is enclosed.

The inspection report contains two unsatisfactory areas and one marginal area. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the numerous NPDES Permit violations. The Flow Measurement section was rated unsatisfactory as a result of the failure to properly monitor the effluent flow rate. The Self-Monitoring Program section was rated marginal as a result of the failure to properly preserve the effluent samples.

The areas noted in the report summary will require a written response by November 13, 2009. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

If you have any questions, please call me at (937) 285 - 6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Ray Maggard, Brown's Run Country Club





State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PR00002*BD	OH0085669	10/13/2009	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brown's Run Country Club 6855 Sloebig Road Middletown, Ohio 45042	1:45 P.M.	11/1/2007
	Exit Time	Permit Expiration Date
	2:40 P.M.	10/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Martin, President	(513) 423-9401	
David Baril, Club Manager	(513) 423-9401	
Mike Harris, Maintenance	(513) 423-9401	
Ray Maggard, WWTP Operator	(937) 746-4362	
Name, Address and Title of Responsible Official	Phone Number	
David Baril, Club Manager 6855 Sloebig Road Middletown, Ohio 45042	(513) 423-9401	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	U	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	U	Effluent/Receiving Waters	M	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 10/26/09 Date	 10/26/09 Date
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 1PR00002*BD
 NPDES #: OH0085669

Average Daily Design Flow:	8000 Gallons/Day
Plant Serves:	Golf Course / Club House / Swimming Pool
Average Daily Flow: (Period of Review):	3684 Gallons/Day (November 2007 through August 2009)
Method of flow monitoring:	Estimate
Type of alarms for plant:	High Water Alarms
Pretreatment	

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Yes**
 Maintenance of pretreatment components is: **Excellent**

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Thin**
 Foam: **None present**
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Excellent**

Comments/Status:

**Secondary Treatment
(Settling)**

Clarity: **Clear**
 Condition of Weir: **Clean**
 Weir is level: **Yes**
 Effluent in weir: **Clear**

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Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Excellent**

Comments/Status:

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Excellent**

Comments/Status:

Sludge Handling/Storage Disposal

Hauler name: **Accurite Sewage and Drain Cleaning**
Disposal Site: **Butler County LeSourdsville WWTP**
Sludge wasted from: **Trash Trap and Sludge Holding Tank**
How often is sludge wasted: **As Needed**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Excellent**

Comments/Status:

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Unnamed tributary of Browns Run**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Summary of Findings / Comments

Areas Requiring a Response

The flow is estimated using a bucket and a stopwatch. This method is not acceptable for estimating the flow rates. Acceptable methods for estimating these flows are, in order of preference, elapsed time meters for the surface sand filter dosing pumps, elapsed time meters on the influent pumps or water usage records. One of these methods must be used.

A security fence must be provided for the WWTP. Brown's Run Country Club (Brown's Run) indicated this fence would be provided this fall. Please notify this office once this fence has been installed.

The WWTP effluent is monitored by grab samples. The grab samples, which are maintained at ambient temperature, are then taken to the Middletown WWTP. The grab samples must be maintained between 0-4°C. To ensure proper preservation, the grab samples must be immediately placed in a cooler with ice.

Areas Not Requiring a Response

A review of the Monthly Operating Reports (MORs) for June 2007 through August 2009 indicated numerous NPDES Permit violations. These violations are addressed on Attachment I. To eliminate these violations, a new WWTP was constructed on July 14, 2009. Brown's Run has adequately addressed these violations. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The WWTP was designed for an average daily flow rate of 8000 gpd. The WWTP consists of a trash trap, a flow equalization basin, an aeration tank, a secondary clarifier, a dosing tank, two surface sand filters, a chlorine contact tank, and a dechlorination tank. A sludge holding tank is also provided. Finally, a grease trap is also provided for the kitchen. The sludge holding tank is pumped as needed. The grease trap is pumped once every other month.

The 2008 annual sludge report indicated that 7500 gallons of were hauled from the WWTP. The sludge was hauled to the Butler County LeSourdsville WWTP.

The WWTP is required to be under the supervision of a Class I operator. Ray Maggard is a Class III wastewater operator. The current rules would allow this facility to be supervised by a Class A operator. Brown's Run was requesting guidance on how to obtain approval for this reclassification. The Ohio EPA would recommend reclassifying the WWTP when the permit is renewed in 2012. However, if Brown's Run wishes to obtain this approval now, an NPDES Permit modification form and a \$200 application fee would be required to be submitted. An Antidegradation Addendum would also be

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required to be submitted. Copies of these forms may be obtained at the following web link: <http://www.epa.state.oh.us/dsw/permits/npdesform.aspx> .

Attachment I
 Brown's Run Country Club
 Effluent Limit Violations for June 2007 through August 2009

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
June 2007	Chlorine	Daily	mg/l	0.019	0.5
August 2007	TSS	Monthly	mg/l	12	33
August 2007	TSS	Weekly	mg/l	18	33
August 2007	TSS	Monthly	kg/day	0.36	0.50
August 2007	Chlorine	Daily	mg/l	0.019	0.57
March 2008	TSS	Monthly	mg/l	12	41
March 2008	TSS	Weekly	mg/l	18	41
March 2008	TSS	Monthly	kg/day	0.36	0.62
March 2008	TSS	Weekly	kg/day	0.55	0.62
June 2008	TSS	Monthly	mg/l	12	15
June 2008	Chlorine	Daily	mg/l	0.019	0.6
August 2008	TSS	Monthly	mg/l	12	20
August 2008	TSS	Weekly	mg/l	18	20
August 2008	Chlorine	Daily	mg/l	0.019	1.3
December 2008	CBOD5	Monthly	mg/l	10	20
December 2008	CBOD5	Monthly	kg/day	0.30	0.30
December 2008	TSS	Monthly	mg/l	12	35
December 2008	TSS	Monthly	kg/day	0.36	0.53
December 2008	CBOD5	Weekly	mg/l	15	20
December 2008	TSS	Weekly	mg/l	18	35
March 2009	TSS	Monthly	mg/l	12	30
March 2009	TSS	Monthly	kg/day	0.36	0.45
March 2009	TSS	Weekly	mg/l	18	30
June 2009	Chlorine	Daily	mg/l	0.019	1.1
August 2009	TSS	Monthly	mg/l	12	31
August 2009	TSS	Monthly	kg/day	0.36	0.47
August 2009	TSS	Weekly	mg/l	18	31
August 2009	Chlorine	Daily	mg/l	0.019	0.11