



**Environmental
Protection Agency**

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



1PV0009720080314

CLARK

BROOKSIDE VILLAGE MHP

LEIBFRITZ, SANDRA 2008/03/14



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, Lt. Governor
Chris Korleski, Director

March 14, 2008

James Geyer, President
JGR Properties
P.O. Box 610
Oxford, OH 45056

CERTIFIED LETTER

**Re: Brookside Village MHP – NPDES No. 1PV00097*BD/OH0122742
Compliance Evaluation Inspection
Notice of Violation – Clark County**

Dear Mr. Geyer:

On March 5, 2008, Sandra Leibfritz conducted an inspection at Brookside Village MHP located at 1962 Mahr Road, South Vienna. The purpose of this inspection was to determine compliance with the terms and conditions of Brookside Village's NPDES permit and Consent Order (case no. 2005 01 0211).

There are three areas that were rated as unsatisfactory and one area was rated as marginal. Details on these ratings may be obtained from the enclosed inspection report.

There are six items that require a response. We ask for a response no later than March 31, 2008. If you have any questions regarding the above, please contact Sandra Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Respectfully,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Clark County Combined Health District





State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00097*BD	OH0122742	3/5/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
JGR Properties Brookside Village MHP 1962 Mahar Road South Vienna, OH 45369	1:00 p.m.	June 1, 2007
	Exit Time	Permit Expiration Date
	2:00 p.m.	May 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
None		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Kevin Miller 406 Monaco Drive Springfield, OH 45506	(937) 525-5880	
Name, Address and Title of Responsible Official	Phone Number	
James Geyer, President JGR Properties, Inc. P.O. Box 610 Oxford, OH 45046	(513) 523-6329	

Ohio EPA Inspector	Ohio EPA Reviewer
<i>Sandra D. Leibfritz</i> 3/11/08 Date	<i>Martyn Burt</i> 3/13/08 Date
Sandra D. Leibfritz Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit # : 1PV00097*BD
 NPDES # : OH0122742

Average Daily Design Flow:	40,000 Gallons/Day
Plant Serves:	169 lots
Average Daily Flow: (Period of Review):	MORs have not been submitted. (September 2007 through January 2008)
Method of flow monitoring:	N/E
Type of alarms for plant:	N/E

Pretreatment

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

Comments/Status:

Plastic products and other debris were observed in the aeration tank and clarifier.

**Secondary Treatment
(Aeration)**

Color of sludge: **Medium Brown**
 Quality of Sludge: **Medium**
 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 type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Plant is flooded	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sludge return is operating	<input type="checkbox"/>	<input checked="" type="checkbox"/>			

Maintenance of aerating equipment is...**Marginal**

Comments/Status:

Plastic products and other debris were observed in the aeration tanks.
 Uneven aeration was observed (not all diffusers were operating).

**Secondary Treatment
(Settling)**

Clarity: **Cloudy**
 Condition of Weir: **Excessive Algae/Solids Build Up**
 Weir is level: **Yes**
 Effluent in weir: **Medium Solids**
 Clarifier walls need scraped: **Unknown**

Permit # : 1PV00097*BD
NPDES #: OH0122742

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

Comments/Status:

Plastic products and other debris were observed in the clarifier and on the weir.
Pin floc was observed flowing over the weirs.

Tertiary Lagoon

	Yes	No		Yes	No
Surface sand Filters: Slow	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Unsatisfactory**

Comments/Status:

Solids could be observed approximately 8-10 inches beneath the surface of the lagoon.
The lagoon was overflowing to the creek, thereby circumventing the detention time in the lagoon.
Very little flow was discharging to the chlorination/dechlorination tank.
A chlorination/dechlorination unit is present.
Post-aeration was occurring in the chlorination/dechlorination tank.

Sludge Handling/Storage Disposal – N/E

Hauler name: **Joe Sweeney**
Disposal Site: **City of Springfield**
Sludge wasted from: **Unknown**
How often is sludge wasted: **Unknown**
Sludge drying beds: **No** Sludge holding tank: **No**

Overall maintenance of components is: **Unknown**

Comments/Status:

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Sinking Creek**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

In recent days there has been significant rain events and snow melt. The receiving stream was muddy brown in color. Impacts to the receiving stream could not be observed. The discharge from the chlorination/dechlorination tank is a trickle. Most of the wastewater is flowing over the bank of the lagoon down to the creek.

EFFLUENT LIMIT VIOLATIONS
(Period of Review: September 2007 through January 2008)

7D = Weekly 30D = Monthly 1D = Daily Conc. = Concentration (mg/l) Qty. = Quantity
(Kg/Day)

<u>Month</u> <u>Reported</u>	<u>Parameter</u>	<u>Frequency / Units</u>	<u>Limit</u>	<u>Value</u>
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MORs (eDMRs) have not been submitted during the period from September 2007 through January 2008 in violation of Part III, Item 4 (Reporting) of Brookside Village MHP's NPDES permit (No. 1PV00097/OH0122742).

Item Requiring a Response

1. The lagoon is at capacity and must at a minimum be cleaned. After upgrades are completed at the WWTP, you will ultimately have to decommission the lagoon to comply with Ohio Administrative Code 3745-40. According to Order No. 6.e (Section V) in JGR Properties' Consent Order (case no. 2005 01 0211), you are required to submit an approvable sludge management plan for closure of the lagoon no later than December 1, 2007. To date, Ohio EPA has not received this plan in violation of your Consent Order. Immediately submit this plan.

During the inspection, the lagoon was overflowing to the creek in violation of Part III, 11 (Unauthorized Discharges) of Brookside Village MHP's NPDES permit (No. 1PV00097/OH0122742). There was no freeboard left in the lagoon. The outlet from the lagoon to the chlorination/dechlorination tank appears to be clogged. There was very little inflow into the chlorination/dechlorination tank. No later than March 31, 2008, explain what actions have been or will be taken to correct this situation.

2. Ohio EPA has not received your self-monitoring reports (eDMRs) during the period from September 2007 through January 2008 in violation of Part III, Item 4 (Reporting) of Brookside Village MHP's NPDES permit (No. 1PV00097/OH0122742). Immediately submit these reports.
3. On October 3, 2007, Ohio EPA received a Permit-to-Install (PTI) application and detail plans for upgrades to Brookside Village MHP's wastewater treatment system. On October 11, 2007, Ohio EPA sent you a letter requesting additional information. As of the date of this letter, you have not responded to our letter. According to Order 6.a (Section V) in JGR Properties' Consent Order (case no. 2005 01 0211), you are required to submit an approvable PTI application and detail plans. To date, Ohio EPA has not able to approve your PTI application because of your failure to

response to our letter dated October 11, 2007 in violation of your Consent Order. Immediately provide a written response to our letter.

In addition, Order No. 6.b (Section V) of your Consent Order (case no. 2005 01 0211) required you to begin construction no later than February 15, 2008. As of the date of this letter, construction has not begun nor can it begin because of your failure to respond in violation of your Consent Order.

4. Part II, Item M of Brookside Village's NPDES requires the park to submit an Annual Sludge Report for 2007 no later than January 31, 2008. Ohio EPA has no record of receiving this report in violation of Part II, Item M of Brookside Village MHP's NPDES permit (No. 1PV00097/OH0122742). Immediately submit your Annual Sewage Sludge Report (Form 4229) for 2008.
5. Aeration in the aeration tanks was uneven. When was the last time the diffusers were inspected and cleaned? Are the diffusers clogged? No later than March 31, 2008 provide a written response addressing this issue?
6. Plastic products and debris were observed in the aeration tank and the clarifier. When was the last time the trash trap was pumped? How often is the trash trap scheduled to be cleaned? Ohio EPA recommends that the trash trap be cleaned.

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JAMES GEYER PRESIDENT
 JGR PROPERTIES
 P O BOX 610
 OXFORD OH 45056

 2. Article Number
 (Transfer from service label)

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