



**Environmental
Protection Agency**

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



1PV0009720080718

CLARK

BROOKSIDE VILLAGE MHP

LEIBFRITZ, SANDRA 2008/07/18



State of Ohio Environmental Protection Agency

Southwest District

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

July 17, 2008

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

CERTIFIED LETTER

**Re: Brookside MHP - NPDES No. 1PV00097*AD/OH0122742
Compliance Evaluation Inspection - Clark County
Notice of Violation - September 2007 through May 2008**

Dear Mr. Geyer:

On July 15, 2008, Sandra Leibfritz conducted an inspection at Brookside MHP wastewater treatment plant located at 1962 Mahar Road, Springfield, Ohio. The purpose of this inspection was to determine compliance with the terms and conditions of Brookside's NPDES permit and compliance with JGR Properties' Consent Order (CV 2205 01 0211). Details of the inspection may be obtained from the enclosed report.

Brookside MHP remains in significant noncompliance with the NPDES No. 1PV00098*BD and the Consent Order. Stipulated penalties are occurring daily as per Section VII of your Consent Order. Please be advised that Ohio EPA, Southwest District Office is recommending escalated enforcement action against JGR Properties for noncompliance issues.

There are seven items that require a response. We ask for a response no later than July 31, 2008. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Clark County Health Department
Kevin Miller, Operator

Permit # : 1PV00097*BD
 NPDES #: OH0122742



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	7/15/08	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	9:50 a.m.	June 1, 2007
	Exit Time	Permit Expiration Date
	10:20 a.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> 7/18/08 Date	<i>Martyn Gurt</i> 7/18/08 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):	0.049 (March 2008 through May 2008)
Method of flow monitoring:	N/E
Type of alarms for plant:	N/E

Comments/Status:

During the period from March 2008 through May 2008, flow monitoring data was reported at 49,000 gpd each day. A continuous flow reading of 49,000 gpd is atypical of discharges from wastewater treatment plants. Brookside MHP is required to accurately monitor, record and report flow.

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **N/E**
 Maintenance of pretreatment components is: **N/E**

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Thin**
 Foam: **None present**
 Odor: **Strong**

	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 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 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:

A strong odor was emanating from the aeration tanks. Aeration was uneven. Some of the diffusers were not operating. The RAS line was not returning solids. The skimmer was returning brown to black solids.

Permit # : 1PV00097*BD
NPDES #: OH0122742

**Secondary Treatment
(Settling)**

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

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

Comments/Status:

The sludge collector in the rectangular clarifier was not working. The chain on the sprocket was sagging. The sprocket was not rotating. At a minimum, there was an inch of solids on the surface of the clarifier. On the north side of the weir, there was at least an inch of solids. On the south side of the weir, the wastewater was extremely turbid with pockets of floating solids.

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 checked="" type="checkbox"/>	Chlorination/Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Unsatisfactory**

Comments/Status:

The polishing lagoon needs to be cleaned out. At several locations, solids were observed at the surface. A chlorination/dechlorination unit is present. The chlorination and dechlorination tablets were not in contact with the wastewater. 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:

The receiving stream, both upstream and downstream of the outfall is clear. The effluent did have an odor.

EFFLUENT LIMIT VIOLATIONS
(Period of Review: March 2008 through May 2008)

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

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2008	Total Suspended Solids	30D Qty	3.0	1298255	3/1/2008
March 2008	CBOD 5 day	30D Qty	3.0	1353894	3/1/2008
March 2008	Total Suspended Solids	7D Qty	4.5	1669185	3/8/2008
March 2008	CBOD 5 day	7D Qty	4.5	853139.	3/8/2008
March 2008	Total Suspended Solids	7D Qty	4.5	927325.	3/15/2008
March 2008	CBOD 5 day	7D Qty	4.5	1854650	3/15/2008
May 2008	Nitrogen, Ammonia (NH3)	30D Qty	1.2	1.3168	5/1/2008
May 2008	Fecal Coliform	30D Conc	1000	14000.	5/1/2008
May 2008	Fecal Coliform	7D Conc	2000	14000.	5/15/2008
May 2008	Nitrogen, Ammonia (NH3)	7D Qty	1.8	1.85465	5/22/2008

MORs (eDMRs) have not been submitted during the period from September 2007 through February 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.
2. Ohio EPA has not received your self-monitoring reports (eDMRs) during the period from September 2007 through February 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.c (Section V) of your Consent Order (case no. 2005 01 0211) required you to complete construction no later than January 15, 2008. As of the date of this letter, construction has not been completed nor can it begin because of your failure to respond to our PTI comment letter (dated October 11, 2007) 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?
6. During the inspection, the sludge collector on the rectangular clarifier was not working. At a minimum, there was at least an inch of solids on the surface of the clarifier. The chain on the sprocket was sagging and the sprocket was not rotating. How long has the sludge collector in the clairfier been off-line. What actions were or will be taken to repair the sludge collector?
7. During the period from March through May 2008, the DMRs reported flow each and every day at 49,000 gpd. This is atypical of discharges from wastewater treatment plants. Brookside's NPDES requires accurate flow monitoring. How is Brookside monitoring flow on a continuous basis?

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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

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1. Article Addressed to:

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

2. Article Number
(Transfer from service label)

7006 2760 0003 0780 8394

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