



**Environmental
Protection Agency**

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



1PV0009720090909

CLARK

BROOKSIDE VILLAGE MHP

LEIBFRITZ, SANDRA 2009/09/09



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

September 9, 2009

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

CERTIFIED LETTER

**Re: Brookside Village MHP – NPDES No. 1PV00097*BD/OH0122742, Clark County
Self-Monitoring Reports NOV – January 2009 through July 2009**

Dear Mr. Geyer:

On August 24, 2009, Sandra Leibfritz conducted an inspection at Brookside Village MHP located at 1962 Mahar Road, South Vienna, Ohio. Details on the inspection may be obtained from the enclosed inspection report.

There are ten (10) items that require a response. We ask for a response no later than September 30, 2009 describing the actions taken to resolve these issues. 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



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	08/24/2009	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
JGR Properties, Inc. Brookside Village MHP 1962 Mahar Road South Vienna, OH 45369	1:00 p.m.	June 1, 2007
	Exit Time	Permit Expiration Date
	1:30 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)	
Ray Coldiron, Operator of Record	937.603.1164 paintball.monkey@yahoo.com	
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 jgrproperties@msn.com	

Ohio EPA Inspector	Ohio EPA Reviewer
 Sandra D. Leibfritz Division of Surface Water Southwest District Office Date: 9/9/09	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 9/9/09

Average Daily Design Flow:	40,000 Gallons/Day*
Plant Serves:	169 lots
Average Daily Flow: (Period of Review):	DMRs have not been submitted. See comment in "Items Requiring a Response"
Method of flow monitoring:	N/E
Type of alarms for plant:	N/E

Comments/Status:

The WWTP consists of a trash trap, a lift station, an aeration tank, a rectangular clarifier, tertiary lagoon and chlorination/dechlorination tank.

The lift station appeared to be operating properly.

* Brookside's NPDES and Consent Order required this facility to upgrade the WWTP and achieve compliance with final effluent limitations no later than August 15, 2008. Once upgrades were complete, the average daily design flow would be 84,300 gallons/day; however, the upgrades never occurred.

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Marginal**

Comments/Status:

According to a letter dated June 4, 2009 from JGR Properties, there were 5 loads of solids pumped from the trash trap; however, plastic products and other debris were observed in the clarifier during the inspection.

**Secondary Treatment
(Aeration)**

Color of sludge: **Dark Brown**
 Quality of Sludge: **Heavy**
 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:

Aeration was occurring during the inspection. Aeration was uneven. *Some of the diffusers were not operating. During the inspection, the RAS line was not returning solids. The MLSS was dark brown.

**Secondary Treatment
 (Settling)**

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

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

Comments/Status:

Plastic products and other debris were observed in the clarifier and on the weir.
 The timer to the RAS pump was not operable. The pump is manually operated to return solids to the aeration tank. The rake arm was operating during the inspection.

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

Overall maintenance of components is: **Unsatisfactory**

Comments/Status:

The tertiary lagoon was covered with duckweed; however, there were several areas where heavy solids were observed above the water level of the lagoon. There is no freeboard left in the tertiary lagoon.

 Chlorination/dechlorination is required from May 1 through October 31.

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: **Unsatisfactory**

Comments/Status:

The Sludge Storage/Disposal area was rated as unsatisfactory due to failure to have adequate sludge holding facilities and for failure to submit the Annual Sludge Report for 2008.

Plant Discharge

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

Overall Effluent/Receiving Stream is: **Unsatisfactory**

Comments/Status:

Sewage fungus was observed immediately beneath the outfall and for approximately 90 feet downstream of the outfall. The creek was observed to be clear and free of sewage fungus upstream of the outfall.

**EFFLUENT LIMIT VIOLATIONS FOR OUTFALL 1PV00097001
 (Period of Review: January through July 2009)**

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 2009	Total Suspended Solids	30D Qty	3.0	27.5226	3/1/2009
March 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.96	2.91009	3/1/2009
March 2009	CBOD 5 day	30D Qty	3.0	20.2641	3/1/2009
March 2009	Total Suspended Solids	1D Conc	18	19.	3/6/2009
March 2009	Total Suspended Solids	1D Qty	4.5	42.0228	3/6/2009
March 2009	CBOD 5 day	1D Qty	4.5	28.0889	3/6/2009
March 2009	Total Suspended Solids	1D Qty	4.5	40.5450	3/11/2009
March 2009	CBOD 5 day	1D Qty	4.5	26.9505	3/11/2009
March 2009	Nitrogen, Ammonia (NH3)	1D Qty	1.44	4.53517	3/19/2009
March 2009	CBOD 5 day	1D Qty	4.5	5.75295	3/19/2009

See comment for "Items Requiring a Response" regarding DMRs (FKA MORs).

**FREQUENCY VIOLATIONS FOR OUTFALL 1PV00097001
 (Period of Review: January through July 2009)**

Reporting Period	Parameter	Sample Frequency	Expected	Reported
January 2009	Water Temperature	1/Day	31	0
January 2009	Color	1/Day	31	0
January 2009	Dissolved Oxygen	1/Week	4	0
January 2009	pH	1/Week	4	0
January 2009	TSS	1/Week	4	0
January 2009	Ammonia	1/2Week	2	0
January 2009	Odor	1/Day	31	0
January 2009	Turbidity	1/Day	31	0
January 2009	Flow	1/Day	31	0
January 2009	CBOD	1/Week	4	0
February 2009	Water Temperature	1/Day	28	0
February 2009	Color	1/Day	28	0
February 2009	Dissolved Oxygen	1/Week	4	0

Reporting Period	Parameter	Sample Frequency	Expected	Reported
February 2009	pH	1/Week	4	0
February 2009	TSS	1/Week	4	0
February 2009	Ammonia	1/2Week	2	0
February 2009	Odor	1/Day	28	0
February 2009	Turbidity	1/Day	28	0
February 2009	Flow	1/Day	28	0
February 2009	CBOD	1/Week	4	0
March 2009	CBOD	1/Week	4	3
March 2009	TSS	1/Week	4	3
April 2009	CBOD	1/Week	4	0
April 2009	TSS	1/Week	4	0
April 2009	Ammonia	1/2Weeks	2	0
May 2009	CBOD	1/Week	4	0
May 2009	TSS	1/Week	4	0
May 2009	Ammonia	1/2Weeks	2	0
May 2009	Chlorine	1/Day	31	4
June 2009	Water Temperature	1/Day	30	0
June 2009	Color	1/Day	30	0
June 2009	Dissolved Oxygen	1/Week	4	0
June 2009	pH	1/Week	4	0
June 2009	TSS	1/Week	4	0
June 2009	Ammonia	1/2Week	2	0
June 2009	Odor	1/Day	30	0
June 2009	Turbidity	1/Day	30	0
June 2009	Flow	1/Day	30	0
June 2009	CBOD	1/Week	4	0
July 2009	Water Temperature	1/Day	31	0
July 2009	Color	1/Day	31	0
July 2009	Dissolved Oxygen	1/Week	4	0
July 2009	pH	1/Week	4	0
July 2009	TSS	1/Week	4	0
July 2009	Ammonia	1/2Week	2	0
July 2009	Odor	1/Day	31	0
July 2009	Turbidity	1/Day	31	0
July 2009	Flow	1/Day	31	0
July 2009	CBOD	1/Week	4	0

Items Requiring a Response

1. JGR Properties is in violation of Brookside Village MHP's Schedule of Compliance for Part I.C a, b, c, d, e and f in NPDES permit no. 1PV00097*BD/OH0122742 and Orders 6 a, b, c, d, and e for in Consent Order (case no. 2005 01 0211) for Brookside Village MHP. No later than September 30, 2009, inform this office, in writing, as to the reason for violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

2. In addition, JGR Properties is in violation of Section V (Upgrade Schedule), Orders 6 f in Consent Order (case no. 2005 01 0211) and Schedule of Compliance for Part I.C e and f for Brookside Village MHP. This Order and NPDES permit required you to complete closure of Brookside Villages MHP's tertiary lagoon no later than January 15, 2009. As of the date of this inspection, the lagoon has not been closed in violation of your Consent Order and NPDES permit. No later than September 30, 2009, inform this office, in writing, as to the reason for violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.
3. For the period from January through July 2009, Ohio EPA has not received your self-monitoring reports (DMRs) as follows:
 - a. January 2009
 - b. February 2009
 - c. June 2009
 - d. July 2009

Failure to submit DMRs is in violation of Part III, Item 4 (Reporting) of Brookside Village MHP's NPDES permit (No. 1PV00097/OH0122742). Immediately submit these reports. Please be advised that JGR Properties is subject to stipulated penalties in Section VII of Consent Order case no. 2005 01 0211 for Brookside Village MHP.

4. During the inspection, Ms. Leibfritz observed sewage fungus immediately beneath the outfall and downstream of the outfall for approximately 90 feet in violation of Part III, Item 2 (General Effluent Limitations) and Ohio Administrative Code 3745-1-04. No later than September 30, 2009, inform this office, in writing, as to the reason for this violation, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.
5. Part II, Item M of Brookside Village's NPDES requires the park to submit an Annual Sludge Report for 2008 no later than January 31, 2009. 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.
6. The lagoon is full of solids with little to no freeboard left in the lagoon. When will solids be hauled from the lagoon and properly disposed of? No later than September 30, 2009, inform this office, in writing, as to the reason for violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

7. Aeration in the aeration tanks was uneven. In a letter dated June 4, 2009, you reported that "the ones that are working are working well and seem to be doing a good job." This statement cannot be justified when DMRs have not been submitted with analytical results for TSS, ammonia and CBOD₅ on the final effluent. No later than September 30, 2009, inform this office, in writing, as to the reason for the inoperable diffusers, as well as a description of the actions taken or proposed to prevent any further maintenance issues. Your response should include the dates, either actual or proposed, for completion of the actions.
8. Plastic products and debris were observed in the clarifier. What is the cause of the plastic products and debris in the clarifier? Is the plant hydraulically overloaded or solids need to be pumped from the trash trap?
9. The fence, surrounding the aeration tanks and the clarifier, is approximately 4 feet in height. There is no fence around the tertiary lagoon or the chlorination/dechlorination tank. All treatment units of the WWTP must be secured at all times with a sturdy six foot perimeter fence with locking gate. What is your time line for securing the WWTP?
10. Your engineer, John Eastman, reported that Ohio EPA would have a PTI application and detail plans for Brookside MHP by the end of July 2009. As of the date of this letter, we have not received this application. What is the status of submitting to Ohio EPA an approvable PTI application and detail plans to comply with your Consent Order and NPDES permit?

Items not requiring a Response

According to our records, Mr. Douglas "Ray" Coldiron is listed as the operator in responsible charge of Brookside Village MHP WWTP beginning on August 10, 2009. Your previous operator, Duane Boswell, resigned on June 30, 2009. Part II, Item A of Brookside Village MHP's NPDES permit requires your WWTP to be under supervision of a Class I State certified operator. From July 1, 2009 through August 9, 2009, Brookside Village MHP violated Part II, Item A for failure to provide a Class I certified operator as required by OAC 3745-7-02.

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