



**Environmental
Protection Agency**

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



1PV0009720101013

CLARK

BROOKSIDE VILLAGE MHP

LEIBFRITZ, SANDRA 2010/10/13



**Environmental
Protection Agency**

Gov. Strickland, Governor
Lee Fisher, Lt. Governor
Chris Koriesk, Director

October 13, 2010

Pete Stojich
GS Holdings-Brookside, Ltd.
6104 Whiting Drive
McHenry, IL 60050

CERTIFIED LETTER

**Re: Brookside Village MHP WWTP, Clark County
Compliance Evaluation Inspection
Notice of Violation August 2010**

Dear Mr. Stojich:

On October 6, 2010 I conducted an inspection at Brookside Village MHP located at 1962 Mahar Road, South Vienna. My inspection indicates violations of the conditions of your NPDES permit and Consent Order (case no. 2005 01 0211). The conditions of the wastewater treatment plant remain in the same condition as noted in the previous two inspections (dated May 17, 2010 and July 1, 2010). The specific instances of noncompliance and deficiencies were as follows:

1. **NPDES Permit Transfer.** Brookside's NPDES permit must be transferred to the new owner by completing and submitting a NPDES permit transfer form. These forms were signed by Mr. Geyer at the last settlement meeting. Immediately complete this form by signing and submitting it to this office.
2. **Schedule of Compliance.** As owner and successor in interest, you are 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, e and f in Consent Order (case no. 2005 01 0211) for Brookside Village MHP.
3. **Part II, Item D.** Mixed liquor suspended solids (brown in color) were observed at the inlet of the lagoon. The lagoon is full of solids with little to no free board left in the lagoon which causes the plant to operate inefficiently and contributes to final effluent violations in violation of Part II, Item D.
4. **Part II, Item D.** Aeration in the aeration tanks was uneven which causes the plant to operate inefficiently and contributes to the final effluent violations in violation of Part II, Item D.
5. **Part II, Item D.** Bulking solids in the clarifier causes the plant to operate inefficiently which contributes to final effluent limits in violation of Part II, Item D.

6. **Part II, Item D.** The rake arm in the clarifier was not working which causes the plant to operate inefficiently and contributes to final effluent limits in violation of Part II, Item D.
7. **Part II, Item D.** There were no chlorination/dechlorination tablets in the disinfection tank which causes the plant to operate inefficiently and contributes to final effluent limits in violation of Part II, Item D.
8. 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?
9. **Final Effluent Limitations & Frequency Violations.**

Final Effluent Limitation Violations for August 2010 (Outfall 001)					
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	Nitrogen, Ammonia (NH3)	30D Conc	1.0	8.14	8/1/2010
August 2010	Nitrogen, Ammonia (NH3)	30D Qty	0.32	.4298	8/1/2010
August 2010	Nitrogen, Ammonia (NH3)	7D Conc	1.5	8.14	8/8/2010
August 2010	pH	1D Conc	6.5	6.15	8/19/2010
August 2010	Chlorine, Total Residual	1D Conc	0.038	.06	8/25/2010

Frequency Violations for August 2010 (Outfall 001)						
Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date	
August 2010	Water Temperature	1/Day	1	0	08/01/2010	
August 2010	Water Temperature	1/Day	1	0	08/07/2010	
August 2010	Water Temperature	1/Day	1	0	08/08/2010	
August 2010	Water Temperature	1/Day	1	0	08/14/2010	
August 2010	Water Temperature	1/Day	1	0	08/15/2010	
August 2010	Water Temperature	1/Day	1	0	08/21/2010	
August 2010	Water Temperature	1/Day	1	0	08/22/2010	
August 2010	Water Temperature	1/Day	1	0	08/28/2010	
August 2010	Water Temperature	1/Day	1	0	08/29/2010	
August 2010	Color, Severity	1/Day	1	0	08/01/2010	
August 2010	Color, Severity	1/Day	1	0	08/07/2010	
August 2010	Color, Severity	1/Day	1	0	08/08/2010	
August 2010	Color, Severity	1/Day	1	0	08/14/2010	
August 2010	Color, Severity	1/Day	1	0	08/15/2010	

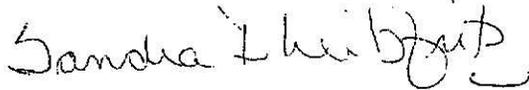
Frequency Violations for August 2010 (Outfall 001) - Continued					
Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2010	Color, Severity	1/Day	1	0	08/21/2010
August 2010	Color, Severity	1/Day	1	0	08/22/2010
August 2010	Color, Severity	1/Day	1	0	08/28/2010
August 2010	Color, Severity	1/Day	1	0	08/29/2010
August 2010	Total Suspended Solids	1/Week	1	0	08/01/2010
August 2010	Total Suspended Solids	1/Week	1	0	08/22/2010
August 2010	Odor, Severity	1/Day	1	0	08/01/2010
August 2010	Odor, Severity	1/Day	1	0	08/07/2010
August 2010	Odor, Severity	1/Day	1	0	08/08/2010
August 2010	Odor, Severity	1/Day	1	0	08/14/2010
August 2010	Odor, Severity	1/Day	1	0	08/15/2010
August 2010	Odor, Severity	1/Day	1	0	08/21/2010
August 2010	Odor, Severity	1/Day	1	0	08/22/2010
August 2010	Odor, Severity	1/Day	1	0	08/28/2010
August 2010	Odor, Severity	1/Day	1	0	08/29/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/01/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/07/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/08/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/14/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/15/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/21/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/22/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/28/2010
August 2010	Turbidity, Severity	1/Day	1	0	08/29/2010
August 2010	CBOD 5 day	1/Week	1	0	08/01/2010
August 2010	CBOD 5 day	1/Week	1	0	08/22/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/01/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/07/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/08/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/14/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/15/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/21/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/22/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/28/2010
August 2010	Chlorine, Total Residual	1/Day	1	0	08/29/2010

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring, reporting requirements or terms and conditions of your NPDES permit may be cause for escalated enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Mr. Stojich
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No later than October 29, 2010 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. If you have any questions, please contact me at (937) 285-6104.

Sincerely,



Sandra D. Leibfritz
Compliance and Enforcement
Division of Surface Water

cc: Clark County Combined Health District
bcoontz@dps.state.oh.us
margaret.malone@ohioattorneygeneral.gov
ray.coldiron@yahoo.com, Operator

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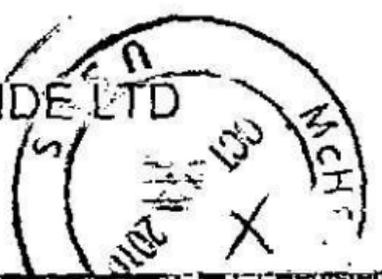
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1. Article Addressed to:

PETE STOJICH
 GS HOLDINGS BROOKSIDE LTD
 6104 WHITING DRIVE
 MCHENRY IL 60050

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

 Agent Addressee

B. Received by (Printed Name)

C. Date of Delivery

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