



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2911

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

March 17, 2009

Mr. Stuart Cole  
Brookville Lake Estates Mobile Home Park  
2526 Stafford Place  
Columbus, Ohio 43209

Re: Montgomery County, Brookville Lake Estates Mobile Home Park, Compliance Evaluation Inspection and Notice of Violation

Dear Mr. Cole:

On March 11, 2009, I conducted a Compliance Evaluation Inspection at Brookville Lake Estates Mobile Home Park (NPDES Permit No. OH0040631; OEPA Permit No. 1PV00035\*FD). A copy of my inspection report is enclosed.

This letter also serves as a Notice of Violation for the effluent violation found in Appendix A of the inspection report, and violation of Part III Item 11 "Unauthorized Discharges" due to the bypass of treatment for 50% of the flow on a daily basis. The "Unauthorized Discharge" is also a violation of Ohio Revised Code 6111.04 "Water Pollution and Sludge Management Violations Prohibited" and Ohio Administrative Code 3701-27-18 "Sewage".

Please inform this office, in writing, within ten days of receipt of this notification as to the reason for the above referenced violations, as well as a description of the actions taken or proposed to prevent further violations. Your response should include the dates, either actual or proposed, for completion of said actions. Please be advised that failure to comply with the effluent limitations, monitoring, or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

During the inspection the following observations were made and will require a written response:

- It was determined that the surface sand filters are at or near failure. The necessity of rehabilitating of the surface sand filters was discussed at length. A plan of action and timeline regarding this matter will need to be submitted to this office.
- The excessive volume water due to inflow and infiltration entering the treatment system was also discussed. Several alternative courses of action were discussed but a decision regarding this matter was not made at the time of the inspection. A plan of action and timeline regarding this matter will need to be submitted to this

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office.

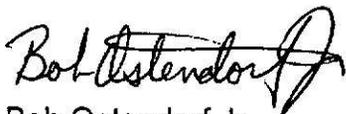
- The waste sand previously removed from the surface sand filters is currently being stored adjacent to the surface sand filters. This practice is unacceptable and the waste material should be disposed of in compliance with local state and federal requirements. A plan of action and timeline regarding this matter will need to be submitted to this office.
- The open treatment system has several open tanks that are either missing or have no grating present. This situation poses a hazard to the mobile home park employees and the treatment plant operator. Either OSHA approved hand rails or grating shall be installed to alleviate this hazard.

Please submit a written plan of action regarding the above bulleted items, including proposed completion dates, to this office by no later than April 15, 2009.

It was also revealed during the course of the inspection that effective January 1, 2009 Brookville Lake Estates is under new ownership. On March 13, 2009 you and I spoke on the telephone regarding this matter. Per our conversation I emailed the required forms to you. Please complete the forms as required and submit them to my attention by no later than May 13, 2009.

If you have any questions regarding this matter please feel free to contact me at (937) 285-6107 or via email at: [Robert.Ostendorf@epa.state.oh.us](mailto:Robert.Ostendorf@epa.state.oh.us).

Sincerely,



Bob Ostendorf Jr.  
Division of Surface Water  
Permits Section

Enclosure

cc: Mr. Greg Ross, Winelco, Inc.



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
1PV00035*FD	OH0040631	3/11/09	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brookville Lake Estates Mobile Home Park 8588 Francie Drive Brookville, OH 45309	11:05	10/1/06
	Exit Time	Permit Expiration Date
	12:30	9/30/13
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Greg Ross, Operator, Winelco, Inc. Mr. Bob Shiverdecker, Park Manager Mr. Stuart Cole, Owner	513-307-8119 937-620-2105 614-404-0445	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Mr. Greg Ross, Operator, Winelco, Inc.	513-307-8119	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Stuart Cole, Owner 2526 Stanford Place Columbus, OH 43209	614-404-0445	

Ohio EPA Inspector	Ohio EPA Reviewer
 Bob Ostendorf Jr. Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
3-17-09 Date	3/17/09 Date

Average Daily Design Flow:	21,000 Gallons/Day
Plant Serves:	Mobile Home Park
Average Daily Flow: (Period of Review):	15,000 Gallons/Day (09/01/08 - 01/31/09)
Method of flow monitoring:	Meter
Type of alarms for plant:	

**Pretreatment**

Type of Pretreatment: **Trash Trap**  
 Does the Trash Trap need pumped: **No**  
 Maintenance of pretreatment components is: **Good**

**Comments/Status:**

**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 type="checkbox"/>	<input checked="" type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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...**Good**

**Comments/Status:**

During the inspection the operator temporarily disabled the blowers. The blowers are normally on a timer and the aeration system seemed to be working well when I initially arrived. The aeration tanks and clarifier are missing several pieces of grating and handrails are not present.

**Secondary Treatment  
 (Settling)**

Clarity: **Clear**  
 Condition of Weir: **Clean**  
 Weir is level: **Yes**  
 Effluent in weir: **Clear**  
 Clarifier walls need scraped: **No**

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

**Comments/Status:**

During the course of the inspection it was discovered that a permanent bypass line had been installed sometime in the past. The bypass line was virtually at the same elevation as the line leading from the clarifier to the surface sand filters. Due to the elevations of the lines being the same, approximately 50% of the flow would bypass the surface sand filters, post aeration and disinfection. This matter was discussed with the representative from Brookville Lake Estates in great detail. The representatives were informed that the bypassing of a treatment process was considered to be an "Unauthorized Discharge" and is prohibited. Before the end of the inspection a temporary plug was placed in the line and the bypass discharge ceased.

**Tertiary Treatment**

	Yes	No		Yes	No
Surface sand Filters: <b>Slow</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Subsurface</b>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Poor**

**Comments/Status:**

This facility has 2 surface sand filters and both seem to be at or near failure. There was 6-10 inches of water on top of each filter. It was determined that during the previous summer up to 4 inches of sand was removed from each of the surface sand filters in an effort to remove sand that may have hampered the flow of the wastewater. The sand which was removed from the sand filters was placed adjacent to the sand filters and was still present at the time of the inspection. When it was determined that the sand was not the problem the matter was investigated further. It was then discovered that the underdrain lines on both surface sand filters had plugged due to the liner failing allowing soil or other material to enter the drain lines.

At this point in the inspection the apparent failure of the surface sand filters and the excessive amounts of I&I entering the system were discussed. Mr. Cole had several questions regarding the course of action to take. I informed him of the pro's and con's to each option and told him that he would have to make the decision of the correct course of action. Mr. Cole and I discussed that a potential course of action was to complete the required upgrades in phases starting with relining the main trunk lines within the collection system and rehabilitating the surface sand filters. At that time he would evaluate the need to further reduce the I&I and determine the need to perform additional plant upgrades. I supported that course of action indicating that the surface sand filters would have to be rehabilitated and the reduction of I&I would only help the treatment system overall.

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**Sludge Handling/Storage/Disposal**

Hauler name: Not determined  
Disposal Site: Not determined  
Sludge wasted from: Aeration Tank  
How often is sludge wasted: As needed.  
Sludge drying beds: **No**                      Sludge holding tank: **No**

Overall maintenance of components is: **Good**

**Comments/Status:**

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**Plant Discharge**

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

**Comments/Status:**

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Permit # : 1PV00035\*FDErr... Reference source not found.  
NPDES # : OH0040631

## APPENDIX A

### EFFLUENT LIMIT VIOLATION (Period of Review: September 2008 – January 2009)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2008	Dissolved Oxygen	Daily Conc	5.0	1.5	12/17/2008

