



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](http://www.epa.state.oh.us)

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

February 17, 2010

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 January 27, 2010, 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 following violations:

1. Final effluent limit violations found in Attachment 1 of the inspection report.
2. Violation of Part III Item 11 "Unauthorized Discharges", of permit 1PV00035\*FD due to the bypass of treatment.
3. Violation of Part III, Item 12 "Noncompliance Notification" of permit 1PV00035\*FD due to the failure to notify the Ohio EPA of a bypass event and the final effluent violations found in Attachment 1 of the inspection report.
4. Violation of Permit to Install requirements as found in Ohio Administrative Code 3745-42-02 "Applicability, exemptions, and procedures" and Ohio Revised Code 6111.045 "Plans for the disposal of waste to be submitted to the director of environmental protection".

Details of the above listed violations can be found in the inspection report included with this letter. The treatment solids that are present on the ground as a result of the above referenced bypass event will need to be removed and disposed of properly. This will need to be completed by no later than February 26, 2010. I have also included with this letter a copy of the Operator of Record Notification Form. Please submit the completed form by no later than February 26, 2010.

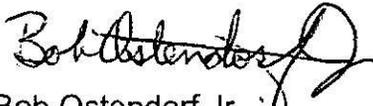


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Please inform this office, in writing, within ten days of receipt of this notification as to the reason for the above referenced violations, as well as a description of the actions taken or proposed to prevent further violations. Your response should 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.

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. Bob Gomez, Winelco, Inc.



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00035*FD	OH0040631	1/27/10	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brookville Lake Estates MHP 8588 Francie Drive Brookville, OH 45309	11:55 a.m.	October 1, 2006
	Exit Time	Permit Expiration Date
	2:00 p.m.	September 30, 2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Bob Gomez, Operator – Winelco, Inc. Mr. Bob Shiverdecker, Brookville Lake Estates MHP	513-317-8673 937-620-2105	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Stuart Cole, Owner 2526 Stanford Place Columbus, OH 43209	614-404-0445	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	N	Compliance Schedule
M	Operations & Maintenance	U	Effluent/Receiving Waters	N	Self-Monitoring Program
M	Facility Site Review	N	Sludge Storage/Disposal	U	Other – Permit to Install
M	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 Bob Ostendorf Jr. Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
2-16-10 Date	2/17/2010 Date

## Summary of Findings / Comments

### Areas Requiring a Response

During the inspection it was revealed that a pump had been replaced in the lift station located at the head of the treatment plant. I was informed that the contractor who performed the pump replacement was instructed to replace the pump with a pump of the same capacity. The pump installed by the contractor has a higher capacity than the previous pump. This was not discovered until after the installation had been completed. I was informed that the new pump had caused operational issues within the plant (solids not able to settle in secondary clarifier – hydraulic overload). The hydraulic overload of the secondary clarifier caused an excessive amount of solids to enter the surface sand filters. It was noted that during this time, solids were removed in excess causing a low solids concentration to be present in the aeration tank. At the time of the inspection the new pump had been taken out of service. The plant is currently operating on a single pump. I was informed that once weather conditions were favorable that additional plumbing would be installed on the discharge side of the new pump. The plumbing would be configured with a valve that would return a portion of the flow back to the sump thereby decreasing the amount of flow entering the treatment plant. Replacement of treatment plant components with components of the exact specifications does not require a Permit to Install. Due to the new pump having a greater capacity than the pump it replaced, a Permit to Install from the Ohio EPA is required for this installation. This installation violated Ohio Administrative Code 3745-42-02 "Applicability, exemptions and procedures" and Ohio Revised Code 6111.45 "Plans for the disposal of the waste to be submitted to director of environmental protection".

It was discovered during the inspection that the sand filters had been bypassed within the previous 4-5 days. Treatment system solids were present on the ground around the surface sand filters (see pictures below). Mr. Shiverdecker indicated that it had rained about a half an inch within the last 4-5 days and that the flow had approximately doubled during the rain event. During the rain event only one sand filter had been placed into service and the other three sand filters were idle. The bypass event violates Part III, Item 11 of permit 1PV00035\*FD. The bypass event had not been reported to the Ohio EPA. Failure to report a bypass event violates Part III, Item 12, of permit 1PV00035\*FD.

As part of the inspection process a compliance review was performed on the facility. The compliance review revealed numerous violations (see Attachment 1 below). The noncompliance notifications provided to the agency were provided 1-2 months after the date of the noncompliance incident. Said notifications were submitted only after the Ohio EPA had reviewed the data submitted by the facility and notified the facility of a potential violation of a Final Effluent Limit. The facility is required to report to the Ohio EPA within 24 hours of discovery any instances of noncompliance, per Part III, Item 12, of permit 1PV00035\*FD. The facility's notification practices are in violation of Part III, Item 12, of Permit 1PV00035\*FD.

Permit # : 1PV00035\*FD  
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### Areas Not Requiring a Response

A review of the operator log book revealed that all of the pages were not numbered. The operator was advised that all the pages are required to be numbered.

The previous inspection finding regarding missing handrails or grating still needs to be addressed. It is recognized that this is scheduled to be rectified sometime this spring.

I was informed during the inspection that achieving effective solids removal in the secondary clarifier continues to be a problem, even with the new pump being taken out of service. Upon further investigation it was revealed that the aeration tank had operated at a low dissolved oxygen content for an extended period of time. The air diffusers in the aeration tank were recently cleaned as a corrective action to the low dissolved oxygen content in the aeration tank. Since the diffusers have been cleaned, a satisfactory dissolved oxygen content has been maintained. During the inspection it was noted that the discharge from the secondary clarifier was turbid. The turbid condition was also noted during the settleometer test. I inquired if a sample of the mixed liquor suspended solids had been evaluated under a microscope to determine the overall health of the micro-organisms. I was told that an evaluation had not been performed. The operator and I discussed the fact that operating an aeration tank with low dissolved oxygen content for an extended period of time can promote the growth of some types of filamentous bacteria which in turn can cause settling problems within the secondary clarification portion of the treatment system.

At the time of the inspection the discharge being sent to Razor Run was very turbid (see picture below). The treatment system has 4 sand filters which are intended to prevent solids from being discharged to the receiving stream. Sand filter number 1 was clogged with solids (see picture below). Sand filter number 2 and 3 appeared to be ready for operation but were idle at the time of the inspection. Sand filter number 4 had an excess amount of solids on the surface of the sand, was in service, and was flooded (see picture below). It should be noted that the surface sand filters were recently rebuilt and redesigned. Upon inquiry it was discovered that only one surface sand filter is usually in service at any given time. I suggested that it may prove beneficial to them to consider putting multiple sand filters into service when excessive flows are anticipated. I also suggested that they investigate a way to configure the plumbing so that as the flow increases additional surface sand filters are automatically put into service. If the current plumbing configuration is modified a Permit to Install may be required.

Mr. Shiverdecker indicated that in the future my contact for this facility would be Mr. Damon Shell. I asked Mr. Shiverdecker to ensure that the owner, Mr. Cole, was made aware of the violations discussed during the inspection. Mr. Shiverdecker indicated that he would inform Mr. Cole.

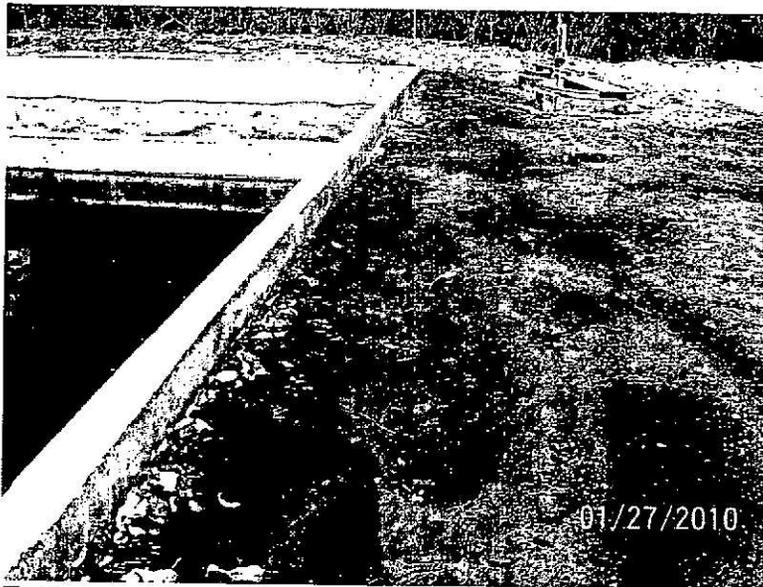


Evidence of Unauthorized Bypass of Treatment: Treatment system solids present on the ground near distribution box on West end of sand filters.

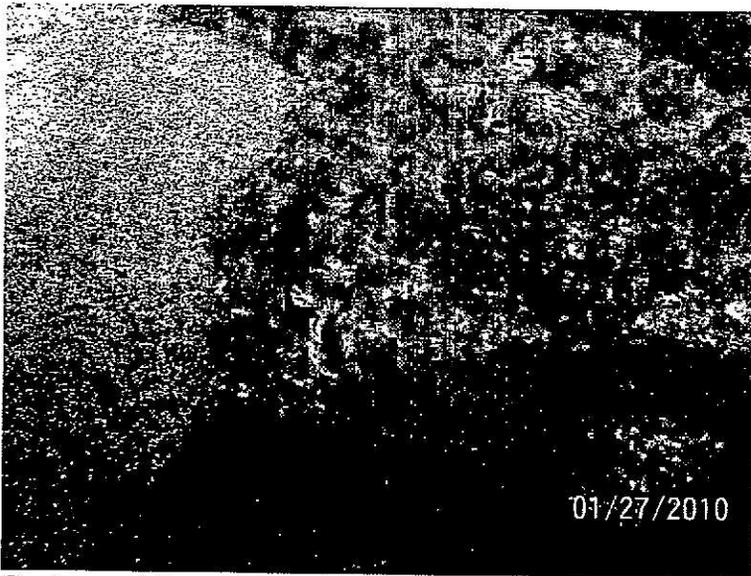


Evidence of Unauthorized Bypass of Treatment: Treatment system solids present on the ground along the South side of the sand filters.

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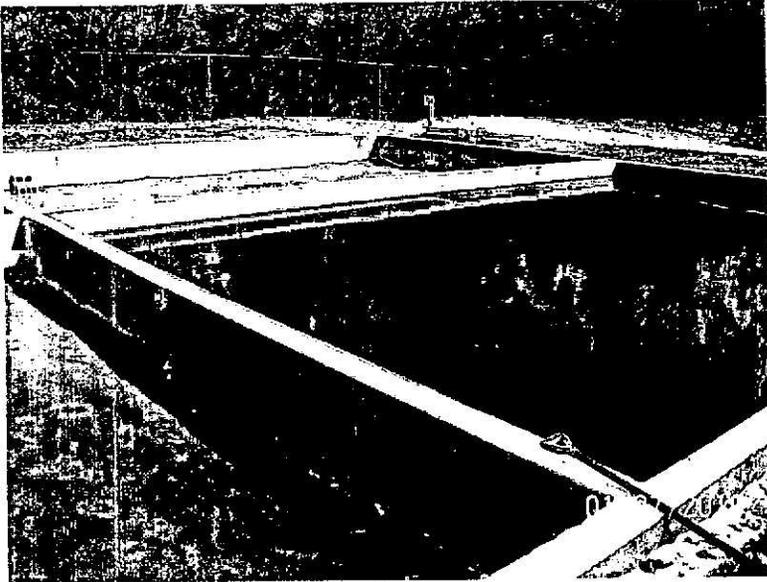


Evidence of Unauthorized Bypass of Treatment: Treatment system solids present on the ground along the East end of the sand filters near the final effluent monitoring station.

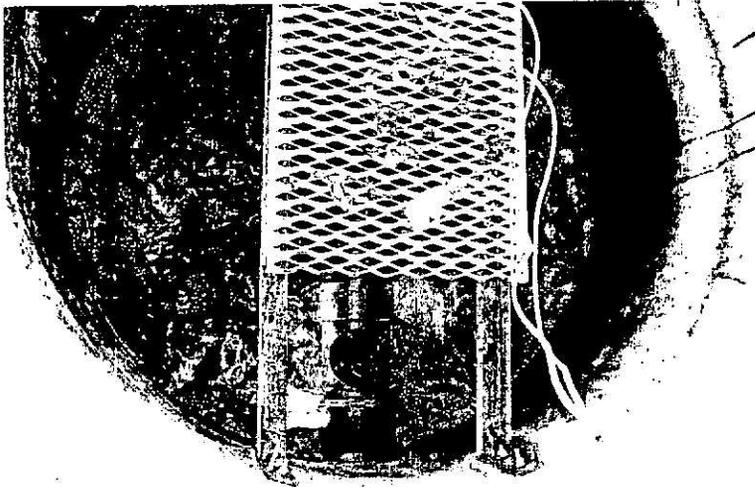


Surface of Sand Filter 1 Plugged with treatment system solids.

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Sand Filter Number 4 flooded



Final Effluent Monitoring Station prior to discharge into Razor Run: Discharge is turbid due to the presence solids.

Permit # : 1PV00035\*FD  
 NPDES #: OH0040631

Attachment I

Brookville Lake Estates Mobile Home Park

Effluent Limit Violations for September 2009 through December 2009

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2009	Total Suspended Solids	Monthly Conc	12	62	9/1/2009
September 2009	Total Suspended Solids	Monthly Qty	0.95	1.5	9/1/2009
September 2009	Ammonia	Monthly Conc	2.0	7.1	9/1/2009
September 2009	Ammonia	Monthly Qty	0.16	0.17	9/1/2009
September 2009	CBOD 5 day	Monthly Conc	10	33	9/1/2009
September 2009	CBOD 5 day	Monthly Qty	0.79	0.80	9/1/2009
September 2009	Total Suspended Solids	Weekly Conc	18	62	9/15/2009
September 2009	Total Suspended Solids	Weekly Qty	1.43	1.50	9/15/2009
September 2009	Ammonia	Weekly Conc	3.0	7.1	9/15/2009
September 2009	CBOD 5 day	Weekly Conc	15	33	9/15/2009
October 2009	Ammonia	Monthly Conc	2.0	19	10/1/2009
October 2009	Ammonia	Monthly Qty	0.16	0.73	10/1/2009
October 2009	Ammonia	Weekly Conc	3.0	19	10/15/2009
October 2009	Ammonia	Weekly Qty	0.24	0.73	10/15/2009
December 2009	Total Suspended Solids	Monthly Conc	12	34	12/1/2009
December 2009	Total Suspended Solids	Weekly Conc	18	34	12/1/2009
December 2009	Total Suspended Solids	Monthly Qty	0.95	2.1	12/1/2009
December 2009	Total Suspended Solids	Weekly Qty	1.43	2.1	12/1/2009
December 2009	CBOD 5 day	Monthly Conc	10	42	12/1/2009
December 2009	CBOD 5 day	Weekly Conc	15	42	12/1/2009
December 2009	CBOD 5 day	Monthly Qty	0.79	2.6	12/1/2009
December 2009	CBOD 5 day	Weekly Qty	1.19	2.60	12/1/2009



Ohio Environmental Protection Agency  
 Division of Drinking and Ground Waters  
 Operator Certification Unit

## Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency  
 Division of Drinking and Ground Waters  
 Operator Certification Unit  
 50 West Town St, Suite 700  
 P.O. Box 1049  
 Columbus, OH 43216-1049

Phone: (614) 644-2752  
 1- 866 - 411-OPCT (6728)  
 Fax: (614) 644-2909  
 email: [opcert@epa.state.oh.us](mailto:opcert@epa.state.oh.us)  
 website: [www.epa.state.oh.us/ddagw/opcert.html](http://www.epa.state.oh.us/ddagw/opcert.html)

### I. SYSTEM INFORMATION

Name of System: \_\_\_\_\_ Phone Number: \_\_\_\_\_

PWS ID/NPDES Permit #: \_\_\_\_\_ STU # \_\_\_\_\_ Classification: \_\_\_\_\_

\_\_\_\_\_  
 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

### II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

### III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

\* A signature by an operator of record who is being removed is not required.  
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: \_\_\_\_\_

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	