



**Environmental  
Protection Agency**

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

October 18, 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 October 12, 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 limits violations found in Attachment 1 of the inspection report.
2. The facility has discharged solids from the wastewater treatment plant in amounts that have settled to form a grey sludge deposit in the receiving stream (see pictures included with inspection report). This is a violation of Part III, Item 2, of permit 1PV00035\*FD.

Details of the above listed violations can be found in the inspection report included with this letter. The Ohio EPA is in receipt of the responses for the Final Effluent limit violations found in Attachment 1 of the inspection report. The responses cited, among other things, low DO concentrations in the aeration tank. Upon further review, I have discovered that a low DO in the aeration tank has previously been cited by the facility as the cause of Final Effluent violations going back to as early as 1991. This appears to be a chronic problem with the facility and I would recommend that you fully assess the capabilities of the aeration equipment (blowers, diffusers, etc.).

Please inform this office, in writing, within ten days of receipt of this notification as to the reason for the above referenced violation of Part III, Item 2 of permit 1PV00035\*FD, 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.

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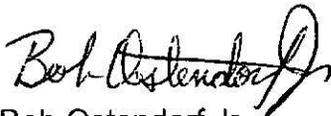
It was also noted during the inspection that there is grating missing above the clarifier. This poses a safety concern in that a person could fall into the clarifier. This matter was identified in a previous inspection and at that time you were instructed to reduce or eliminate this safety concern by either the use of handrails or grating. Mr. Shell indicated during the inspection he would investigate the purchase of additional grating to eliminate this situation.

A black drain tile adjacent to the Final Effluent discharge pipe was discovered during the inspection Mr. Shell was unaware of the tile and its purpose. Please advise this office as to the purpose and intended use of the tile in question.

During the inspection Mr. Shell and I discussed the expiration of permit 1PV00035\*FD on September 30, 2011. Mr. Shell and I also discussed that should this permit be renewed it will contain a requirement for a sign to be placed at the final outfall identifying the discharge and who to contact with questions. The final effluent discharge pipe is not easily accessible (severely overgrown) and Mr. Shell indicated that he would ensure the area was easier to access before the permit renewal.

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	10/12/10	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	11:10 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. Greg Ross – Winelco, Inc. Mr. Eric Gibson – Winelco, Inc. Mr. Damon Shell, Brookville Lake Estates MHP	513-317-8673 513-755-8050 937-620-2105	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Robert Armstrong WW1-1015880-98 Robert Gomez Jr WW1-1065576-05 Andrew Griner WW1-1010126-94 Greg Ross WW3-1013587-96 Mike Ullman WW3-1007257-83	513-755-8050	
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
10-18-10 Date	10/18/10 Date

Average Daily Design Flow:	<b>21,000 Gallons/Day</b>
Plant Serves:	Mobile Home Park
Average Daily Flow: (Period of Review):	<b>19,571 Gallons/Day (01/01/10-09/01/10)</b>
Method of flow monitoring:	<b>Estimated (run-time meter)</b>
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: **Light Brown**  
 Quality of Sludge: **Medium**  
 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Fair**

**Comments/Status:**  
 During the inspection Mr. Ross commented that they have been struggling to maintain an adequate amount of DO within the aeration tank. He said that they had recently replaced a check valve which had failed and allowed solids to enter the diffuser causing a partial plugging of the diffusers. He said that they intended to remove, clean and replace the diffusers in the near future. Although the blowers are equipped with a timer they are being ran all the time in an effort to ensure that adequate DO is present in the aeration tank. I inquired as to if they had measured the CFM from the blowers to see if they were producing the correct amount of air and Mr. Ross indicated that they had not verified the CFM produced by the blowers. It was noted that additional grating has been placed above the aeration tank.

**Secondary Treatment  
 (Settling)**

Clarity: **Clear**  
 Condition of Weir: **Clean**  
 Weir is level: **Yes**  
 Effluent in weir: **Clear**  
 Clarifier walls need scraped: **Unknown**

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

**Comments/Status:**

There are substantial gaps in the grating above the clarifier. Mr. Shell was advised that this posed a safety risk and additional grating would need to be installed above the clarifier.

**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 checked="" type="checkbox"/>	<input 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: **Good**

**Comments/Status:**

Two of the four surface sand filters were in use at the time of the inspection. The two sand filters in use were flooded. The two sand filters not in use did not have any ponding and appeared to have not been used in quite some time. Mr. Shell said that they were able to run a couple of months before they had to alternate filters.

**Sludge Handling/Storage Disposal**

Hauler name:  
 Disposal Site:  
 Sludge wasted from:  
 How often is sludge wasted:  
 Sludge drying beds: **No**                      Sludge holding tank: **No**

Overall maintenance of components is: **N/A**

**Comments/Status:**

The facility has not historically had to remove sludge due to the amount of solids entering the surface sand filters. Mr. Ross said that he anticipates having to haul sludge in the future once they are able to correct the low DO situation.

**Plant Discharge**

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

**Comments/Status:**

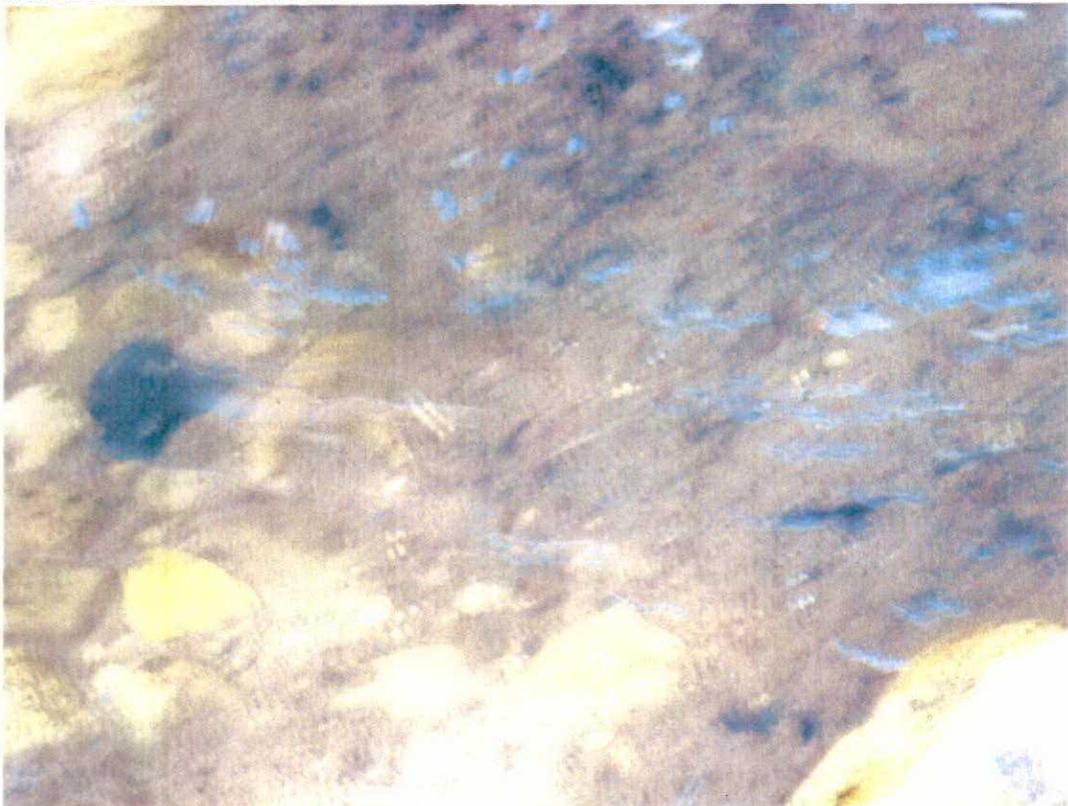
Upon closer examination of the outfall it was evident that the facility had discharged excessive amounts of solids to the receiving stream (see pictures included with this report). The solids present within the receiving stream were noticeable for a distance of approximately 20 feet downstream. The solids were not present upstream from the final effluent discharge pipe. A drain tile adjacent to the final effluent pipe was discovered during the inspection. Mr. Shell was unaware of the tile and did not know its purpose (see picture included with this report).

**Attachment 1  
 EFFLUENT LIMIT VIOLATIONS  
 (Period of Review: 07/01/10 - 09/01/10)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2010	Total Suspended Solids	Monthly Conc	12	23	7/1/2010
July 2010	Total Suspended Solids	Monthly Qty	0.95	1.2	7/1/2010
July 2010	Nitrogen, Ammonia (NH3)	Monthly Conc	2.0	20	7/1/2010
July 2010	Nitrogen, Ammonia (NH3)	Monthly Qty	0.16	1.0	7/1/2010
July 2010	Fecal Coliform	Monthly Conc	1000	7000	7/1/2010
July 2010	CBOD 5 day	Monthly Conc	10	10	7/1/2010
July 2010	Total Suspended Solids	Weekly Conc	18	23	7/22/2010
July 2010	Nitrogen, Ammonia (NH3)	Weekly Conc	3.0	20	7/22/2010
July 2010	Nitrogen, Ammonia (NH3)	Weekly Qty	0.24	1.0	7/22/2010
July 2010	Fecal Coliform	Weekly Conc	2000	7000	7/22/2010
August 2010	Nitrogen, Ammonia (NH3)	Monthly Conc	2.0	21	8/1/2010
August 2010	Nitrogen, Ammonia (NH3)	Weekly Conc	3.0	21	8/1/2010
August 2010	Nitrogen, Ammonia (NH3)	Monthly Qty	0.16	1.0	8/1/2010
August 2010	Nitrogen, Ammonia (NH3)	Weekly Qty	0.24	1.0	8/1/2010



Unknown black drain tile



Solids deposition (grey sludge) in receiving stream



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



Solids deposition (grey sludge) in receiving stream

