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State of Ohio Environmental Protection Agency

Central District Office

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P.O. Box 1049  
Columbus, OH 43216-1049

**Certified Mail #91 7108 2133 3932 4450 2076**

November 20, 2008

Sharon Crist  
1795 Brookdale Road  
Lancaster, OH 43130

Dear Ms. Crist:

Attached is a report for a Reconnaissance Inspection that I performed October 28, 2008, at the wastewater treatment plant (WWTP) serving your mobile home park. I appreciate the work that you have already performed to manage wastewater discharged from your mobile home park. As was discussed during the inspection and as referenced in the inspection report, additional work is needed to provide consistent compliance with your wastewater discharge permit.

Please review the report carefully and let me know if you have questions. I can be reached by telephone at 614-728-3850 or by e-mail at [jan.rice@epa.state.oh.us](mailto:jan.rice@epa.state.oh.us).

Sincerely,

Jan A. Rice  
Environmental Specialist  
Division of Surface Water  
Central District Office

Enclosure

JAR/nsm Brookdale MHP 10-28-08 RI Covitr

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



**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

<b>Permit No.</b> 4PV00121	<b>NPDES No.</b> OH0136298	<b>Date</b> 10/28/08	<b>Inspection Type</b> R	<b>Inspector</b> S	<b>Facility Type</b> 1
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**B. FACILITY DATA**

<b>Name and Location of Facility Inspected</b> Brookdale Mobile Home Park WWTP 1795 Brookdale Road Lancaster, Ohio 43130	<b>Entry Time</b> 12:25 P.M.	<b>Permit Effective Date</b> 4/1/06
	<b>Exit Time</b> 1:25 P.M.	<b>Permit Expiration Date</b> 3/31/11

<b>Name(s) and Title(s) of On-Site Representative(s)</b> Robert and Kendra Flowers (Limited Class A Wastewater) operators Sharon Crist (Limited Class A Wastewater) operator, owner	<b>Phone Number(s)</b> 740-654-4951
<b>Name, Address and Title of Responsible Official</b> Sharon Crist (owner), 1795 Brookdale Road, Lancaster, Ohio 43130	<b>Phone Number</b> 740-654-4951

**C. AREAS EVALUATED DURING INSPECTION**

<u>  </u> S Permit	<u>  </u> N Flow Measurement	<u>  </u> N Pretreatment
<u>  </u> N/M Records/Reports	<u>  </u> N Laboratory	<u>  </u> N Compliance Schedules
<u>  </u> U/S Operations & Maintenance	<u>  </u> U/N Effluent/Receiving Waters	<u>  </u> M Self-Monitoring Program
<u>  </u> S Facility Site Review	<u>  </u> N Sludge Storage/Disposal	<u>  </u> Other
<u>  </u> N Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

**D. SUMMARY OF FINDINGS/COMMENTS** (attach additional sheets if necessary)  
See Attachment "A".

*Jan Rice*  
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Jan Rice, Inspector, Ohio EPA, Central District Office

*11/24/08*  
\_\_\_\_\_  
Date

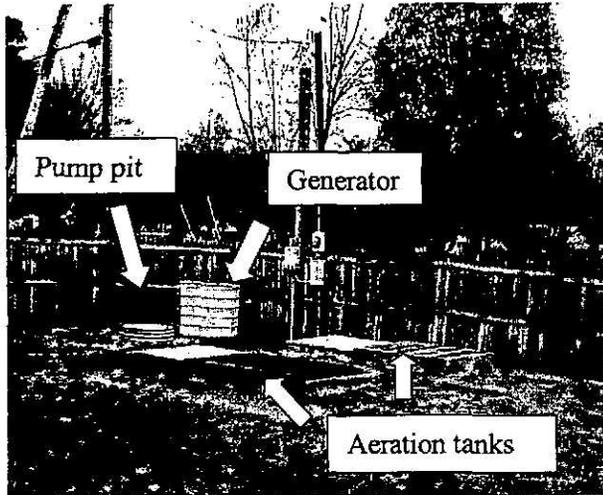
*Erin Sherer*  
\_\_\_\_\_  
Erin Sherer, Reviewer, Ohio EPA, Central District Office

*11/24/08*  
\_\_\_\_\_  
Date

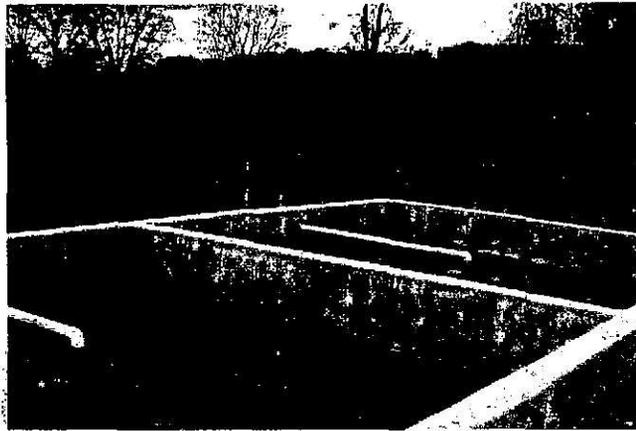
Attachment "A"  
Brookdale Mobile Home Park  
Summary of Findings/Comments

Since the time of the last inspection on September 19, 2006, the wastewater treatment plant upgrade has been completed. Photographs of the completed facility are included in this report.

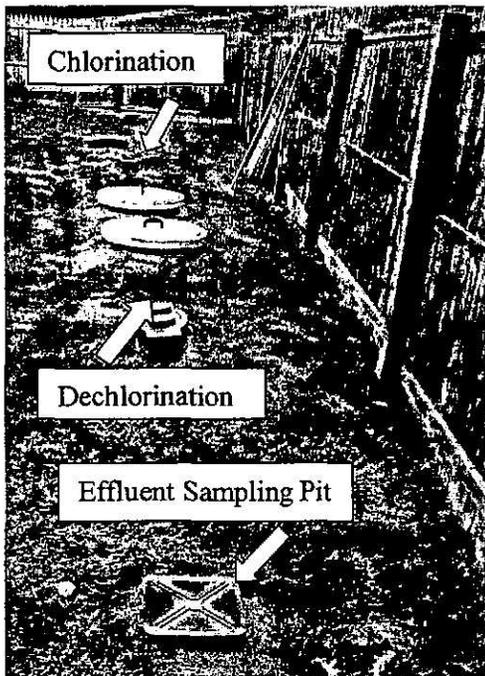
The photograph below shows the plant's aeration tanks, pump pit and an enclosed generator for use during power outage.



The photograph below shows the plant's new sand filters.



The photograph below shows chlorination/dechlorination and a sampling pit for collection of effluent samples. Note that a security fence has been installed around the entire plant.



Wastewater discharged from this plant is routed into the mobile home park's storm water drainage system.

This WWTP is currently overseen by individuals certified as Limited Class A wastewater operators. The operators currently lack sufficient knowledge regarding operational techniques to manage this treatment plant to be compliant with the applicable wastewater discharge permit.

The operators work with the MASI laboratory for collection and analysis of final effluent samples, but the operators appear to not know how to relate the laboratory results to permit effluent limitations. Review of laboratory results show that the WWTP has been in noncompliance with effluent limitations for an extended period of time.

The operators have been fastening copies of the laboratory results to the monthly operating reports thinking that such data submittal was appropriate. Data submitted in this manner can not be electronically scanned by Ohio EPA for comparison with permit effluent limitations. The operators are now working to resubmit past data electronically and to ensure that future data is submitted appropriately.

Attachment "A"

Brookdale Mobile Home Park  
Summary of Findings/Comments

This WWTP needs to be operated to provide consistent wastewater discharge permit compliance. Part II, Item A in the permit indicates that the WWTP must be under supervision of a Class I State certified operator. With this in mind the permittee must contract with an appropriately certified operator as soon as possible and notify this office in writing regarding that operator's certification, name, telephone number, and mailing address. On October 29, 2008, the permittee was provided a website listing certified operators in Ohio.

Ohio EPA records indicate that the Limited Class A wastewater certificates for both Robert and Kendra Flowers will expire December 31, 2009. The Limited Class A wastewater certificate for Sharon Crist will expire December 31, 2010. Plant operators must thoroughly familiarize themselves with Ohio Administrative Code (OAC) Rule 3745-7 Operator Certification for Public Water Systems and Wastewater Treatment Works (<http://www.epa.state.oh.us/ddagw/oac.html#374507>) for information regarding certification renewal and required training.

The Ohio EPA is preparing a training course for operators of small wastewater treatment systems. Until that course is available operators may consider obtaining training from several sources as listed below. Prior to course selection an operator should contact staff in the Ohio EPA certification unit (<http://www.epa.state.oh.us/ddagw/opcert.html>) to confirm that selected courses are acceptable towards contact hours.

Ohio Training Committee of Ohio (OTCO) <http://www.ohiowater.org/OTCO/index.htm>

California State University at Sacramento (CSUS) <http://www.owp.csus.edu/training/index.php>

360Water.com <http://www.360water.com/>

CEUplan.com <http://www.ceuplan.com/StatePage.aspx?stateId=52>

After consistent wastewater discharge permit compliance has been demonstrated for one year, the permittee may submit an application for modification of its wastewater discharge permit to allow WWTP oversight by a Limited Class A wastewater operator.



11-11-11

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