

FILE COPY



State of Ohio Environmental Protection Agency

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

December 1, 2009

Sharon Crist
1795 Brookdale Road
Lancaster, OH 43130

Dear Ms. Crist:

Attached is a report for a Reconnaissance Inspection that I performed November 3, 2009 at the wastewater treatment plant (WWTP) serving your mobile home park. 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.

Sincerely,

Jan A. Rice
Environmental Specialist
Field Operations Unit
Central District Office

Enclosure

c: Jeff Hickman, Operator

JAR/nsm Brookdale MHP 11-03-09 Ricovltr

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



NPDES
Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. 4PV00121*AD	NPDES No. OH0136298	Date 11/03/09	Inspection Type R	Inspector S	Facility Type 2
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B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brookdale MHP 1795 Brookdale Rd. Lancaster, Ohio	1:00 P.M.	4/1/06
	Exit Time	Permit Expiration Date
	1:30 P.M.	3/31/11

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

C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

- S Permit
- N/S Records/Reports
- N Operations & Maintenance
- M Facility Site Review - unauthorized installation of a sludge dewatering/storage tank.
- S Collection System – a portion of the collection system has been replaced with new lines to help minimize inflow/infiltration of surface/groundwater into the collection system.
- N Flow Measurement
- N Laboratory
- U/N Effluent/Receiving Waters – effluent limitation violations are listed in Attachment “A”. The permittee has continued efforts to eliminate effluent limitation violations. Continued violations are unacceptable.
- M Sludge Storage/Disposal - a plastic tank for sludge dewatering/storage has been installed next to the WWTP extended aeration tank. A photograph of the sludge storage tank is included in this report.
- N Pretreatment
- S Compliance Schedules – the wastewater treatment plant (WWTP) upgrade has been completed but additional work is likely necessary to better manage sludge dewatering and storage.
- S Self-Monitoring Program

D. SUMMARY OF FINDINGS/COMMENTS: Since the time of the last inspection on July 8, 2009 the permittee has continued efforts to provide consistent wastewater discharge permit compliance. Jeff Hickman (tele. no.: 740-653-4324 (ext.:2117)), is a Class II operator hired to guide the Class “A” operators for this WWTP until consistent permit compliance can be demonstrated. Kim May, the owner’s son, is in training to become a Class “A” operator for this WWTP.

Upgrade of this WWTP was authorized through a Permit to Install (PTI) (Ohio EPA no.: 01-11517) effective June 10, 2005. The PTI was issued for installation of sand filters, a dosing unit, disinfection and dechlorination. This work has been completed and a fence installed around the WWTP components. Additional work is likely necessary to better manage sludge dewatering and storage and to help provide more consistent wastewater discharge permit compliance.

Since the time of the last inspection the sanitary sewer collection system has been improved through replacement of several main collector lines. Early indications from the operators are that this work has reduced inflow/infiltration of surface/groundwater into the collection system.

Since the time of the last inspection the permittee has installed a plastic tank for sludge dewatering/storage. Even though additional sludge dewatering/storage is beneficial at this WWTP the PTI contained no authorization for inclusion of such components.

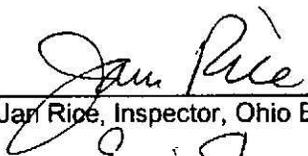
A November 23, 2009 telephone discussion with Mr. Hickman indicated the possibility that another tank that is part of the original WWTP might possibly be converted for use in sludge dewatering/storage. If the permittee decides to convert this tank for use in sludge holding/dewatering then information regarding use of this tank must be included in a PTI application submitted to this office for review. If the plastic tank is to be a permanent component in this WWTP then the PTI application must contain information such as, but not limited to, how the plastic tank will be protected from the elements i.e. freezing and sunlight (ultraviolet light) and how a spill will be managed if the tank ruptures. Details regarding sludge transfer into and out of the plastic tank must be included in the PTI. Secondary containment may be a necessity for the plastic tank.

This PTI must be submitted to the Ohio EPA in accordance with Ohio Administrative Code 3745-42. A fact sheet summarizing OAC 3745-42 can be viewed at this website:

http://www.epa.state.oh.us/portals/35/rules/fact%20sheet%20final%20rule_42_02_feb08.pdf.

PTI application forms that must be included for review include Form A, Form B4-7 and the Antidegradation Addendum. These forms are available at this website: <http://www.epa.state.oh.us/dsw/pti/PTIForms.aspx>. Please include processing fees as required in Form A. If the permittee has questions regarding forms completion then the permittee should have its professional engineer contact Kelly Thiel in this office by e-mail at kelly.thiel@epa.state.oh.us or by telephone at 614-728-3856.

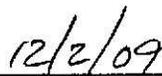
The permittee must provide this office in writing by January 1, 2010 a time line it intends using for submittal of the PTI application as well as dates for initiation and completion of the sludge management improvements. The permittee must also provide this office in writing as soon as possible the name, telephone number and address of both the sludge hauler and the facility at which sludge is disposed.



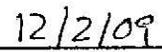
Jan Ripe, Inspector, Ohio EPA, Central District Office



Erin Sherer, Reviewer, Ohio EPA, Central District Office



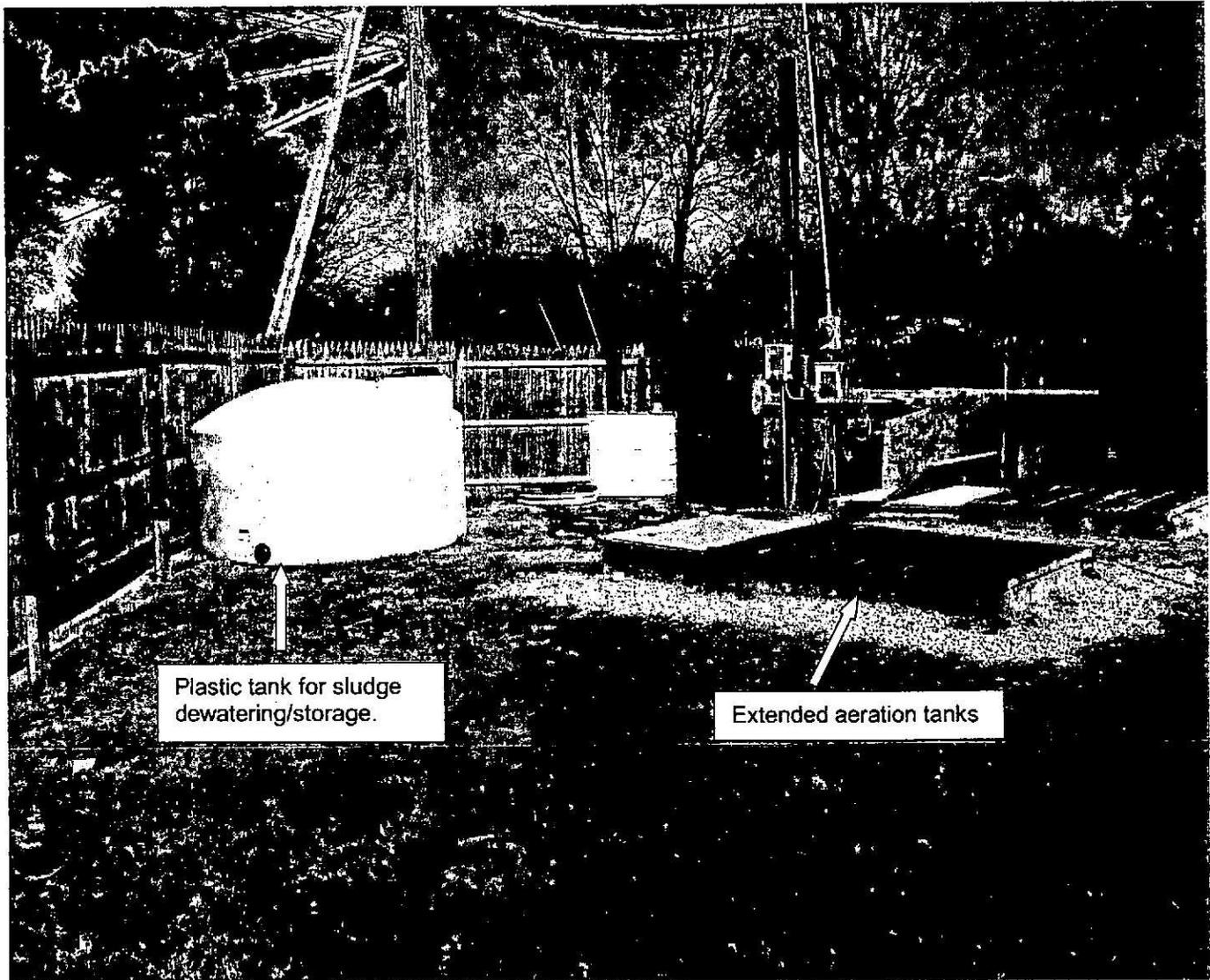
Date



Date

Attachment "A"
 Brookdale MHP
 Effluent Limitation Violations
 8/1/09 – 10/31/09

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PV00121*AD	August 2009	001	80082	CBOD 5 day	30D Qty	0.31	.80696	8/1/2009
4PV00121*AD	August 2009	001	80082	CBOD 5 day	30D Conc	10	41.	8/1/2009
4PV00121*AD	August 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.03	.56607	8/1/2009
4PV00121*AD	August 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	30.9	8/1/2009
4PV00121*AD	August 2009	001	00530	Total Suspended Solids	30D Qty	0.37	1.06283	8/1/2009
4PV00121*AD	August 2009	001	00530	Total Suspended Solids	30D Conc	12	54.	8/1/2009
4PV00121*AD	August 2009	001	80082	CBOD 5 day	7D Qty	0.46	.80696	8/15/2009
4PV00121*AD	August 2009	001	80082	CBOD 5 day	7D Conc	15	41.	8/15/2009
4PV00121*AD	August 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.05	.56607	8/15/2009
4PV00121*AD	August 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	30.9	8/15/2009
4PV00121*AD	August 2009	001	00530	Total Suspended Solids	7D Qty	0.55	1.06283	8/15/2009
4PV00121*AD	August 2009	001	00530	Total Suspended Solids	7D Conc	18	54.	8/15/2009
4PV00121*AD	August 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	1.45	8/19/2009
4PV00121*AD	August 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	1.	8/28/2009



Plastic tank for sludge dewatering/storage.

Extended aeration tanks

Figure 1. This is a photograph of the plastic tank in use for sludge dewatering/storage at the Brookdale MHP.