



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

July 12, 2011

CERTIFIED LETTER

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

Re: Montgomery County, Brookville Lake Estates Mobile Home Park, NPDES Permit Violations

Dear Mr. Cole:

The Ohio EPA has completed a compliance evaluation of the Data Monitoring Reports (DMR) covering the months of April through May 2011 for the Brookville Lake Estates Mobile Home Park. The evaluation indicates violations of the conditions of your NPDES Permit (NPDES Permit # OH0040631; OEPA Permit # 1PV00035*FD). The specific instances of noncompliance are as follows:

Final Effluent Violations					
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2011	TSS	Monthly Conc	12	26	4/1/2011
April 2011	TSS	Monthly Qty	0.95	1.5	4/1/2011
April 2011	TSS	Weekly Conc	18	26	4/22/2011
April 2011	TSS	Weekly Qty	1.43	1.48	4/22/2011
May 2011	TSS	Monthly Conc	12	25	5/1/2011
May 2011	Ammonia	Monthly Conc	2.0	13	5/1/2011
May 2011	Ammonia	Monthly Qty	0.16	0.44	5/1/2011
May 2011	TSS	Weekly Conc	18	25	5/22/2011
May 2011	Ammonia	Weekly Conc	3.0	13	5/22/2011
May 2011	Ammonia	Weekly Qty	0.24	0.44	5/22/2011
May 2011	Fecal Coliform	Weekly	2000	TNTC*	5/26/2011
May 2011	Fecal Coliform	Monthly	1000	TNTC*	5/26/2011

TNTC* = Too Numerous To Count

Frequency / Monitoring Violations						
Reporting Period		Parameter	Sample Frequency	Expected	Reported	Violation Date
May	2011	Color	1/Day	1	0	05/27/2011
May	2011	Odor	1/Day	1	0	05/27/2011
May	2011	Turbidity	1/Day	1	0	05/27/2011

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.

I would also like to take this opportunity to let you know that the Ohio EPA is in receipt of the application to renew NPDES permit 1PV00035*FD. Due to the ongoing violations of permit 1PV00035*FD, Brookville Lake Estates is currently in Significant Non-Compliance. Please be advised that Ohio Revised Code 6111.03(J)(7) states "A permit may be issued for a period not to exceed five years and may be renewed upon application for renewal and upon finding by the director that the permit holder is making satisfactory progress toward the achievement of all applicable standards and has complied with the terms and conditions of the existing permit. ...".

I have included with this letter the inspection report and Notice of Violation dated May 11, 2011 that previously failed to reach you via certified mail. Mr. Bob Gomez of Winelco, Inc. did respond to the Notice of Violation on your behalf and an additional response is not required at this time.

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 or concerns regarding this matter please feel free to contact me at (937) 285-6107 or via email at Robert.Ostendorf@epa.state.oh.us.

Sincerely,



Bob Ostendorf Jr.
Division of Surface Water
Permit Section

Enclosure(s)



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 11, 2011

CERTIFIED LETTER

Ms. MarilynJ. Cole
Brookville LLC
2526 Stafford Place
Columbus, Ohio 43209

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

Dear Ms. Cole:

On April 22, 2011, I conducted an unannounced 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. The inspection revealed the bypassing of treatment as described in the attached inspection report. The bypassing of treatment is a violation of Part III, Item 11 of permit 1PV00035*FD. A written response regarding this violation is required.
2. The Ohio EPA was not notified of said bypass event as required in Part III, Item 12 of permit 1PV00035*FD. A written response regarding this violation is required.
3. It was apparent during the inspection that the surface sand filters had an excessive amount of solids on them. The excessive amount of solids on the surface sand filters prevented them from operating properly. The failure to maintain the treatment works in good working order is a violation of Part III, Item 3 of permit 1PV00035*FD. A written response regarding this violation is required.
4. As part of the inspection process a compliance scan was performed of the data submitted on the Data Monitoring Reports submitted by the facility. Several Final Effluent Limit violations were identified and are listed in Attachment 1 of this inspection report. A written response regarding this violation is required.
5. A bypass event which occurred on February 28, 2011 was reported by Winelco, Inc.. A response for said violation has been received by the Ohio EPA and an additional response for this violation is not required.

Ms. Marilyn J. Cole
May 11, 2011
Page 2

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.

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
1PV0035*FD	OH0040631	4/22/11	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brookville Lake Estates 8588 Francie Drive Brookville, OH 45309	12:00	October 1, 2006
	Exit Time	Permit Expiration Date
	1:00	September 30, 2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Name, Address and Title of Responsible Official	Phone Number	
Ms. Marilyn J. Cole, Owner Brookville, LLC 2526 Stafford 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
U	Operations & Maintenance	U	Effluent/Receiving Waters	N	Self-Monitoring Program
U	Facility Site Review	N	Sludge Storage/Disposal	N	Other
U	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
5-11-11 Date	5/11/11 Date

Permit # : 1PV00035*FD
NPDES #: OH0040631

Summary of Findings / Comments

I arrived at the facility at approximately 12:00 on April 22, 2010 for the purpose of performing an unscheduled inspection. I attempted to contact the Park Manager but the office was closed at the time of the inspection. I proceeded to the WWTP and the gate to the plant was locked. I was able to gain access to the facility via a section of the security fence which was lying on the ground. Upon entry into the facility it was apparent that the surface sand filters had overflowed onto the ground (see pictures in Attachment 2). It was also discovered that a sump pump had been placed in the surface sand filter. The sump pump was actively pumping wastewater into the post aeration chamber which is located prior to disinfection and discharge to Razor Run (see pictures in Attachment 2).

Areas Requiring a Response

1. The situation described previously is considered a bypass of treatment. The bypassing of treatment is a violation of Part III, Item 11 of permit 1PV00035*FD.
2. The Ohio EPA was not notified of said bypass event as required in Part III, Item 12 of permit 1PV00035*FD.
3. It was apparent during the inspection that the surface sand filters had an excessive amount of solids on them. The excessive amount of solids on the surface sand filters prevented them from operating properly. The failure to maintain the treatment works in good working order is a violation of Part III, Item 3 of permit 1PV00035*FD.
4. As part of the inspection process a compliance scan was performed of the data submitted on the Data Monitoring Report. Several Final Effluent Limit violations were identified and are listed in Attachment 1 of this inspection report.

Permit # : 1PV00035*FC
NPDES #: OH0040631

Attachment 1
Brookville Lake Estates
Effluent Limit Violations for January 2011 through March 2011

Effluent Limit Violations					
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2011	TSS	Weekly Qty	1.43	2.13	2/22/2011
February 2011	CBOD	Weekly Qty	1.19	2.75	2/22/2011
February 2011	TSS	Monthly Qty	0.95	2.13	2/1/2011
February 2011	CBOD	Monthly Conc	10	12.9	2/1/2011
February 2011	CBOD	Monthly Qty	0.79	2.75	2/1/2011

Attachment 2
April 22, 2011 pictures from unannounced Compliance Evaluation Inspection at
Brookville Lake Estates.



Evidence of the surface sand filter overflowing onto ground. Solids present on surface of surface sand filter and the ground adjacent to the surface sand filter. In speaking with Bob Gomez of Winelco it was determined that the storm drain pictured above, leads back to the WWTP pump station.



Active sump pump located in surface sand filter.



Discharge line from sump pump leading to post aeration chamber.



Wastewater being discharged to post aeration chamber, bypassing the surface sand filter treatment unit.

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Sent To Mr. Stuart Cole Brookville Lake
 Street, Apt. No.,
 or PO Box No. 2526 Stafford Place Estates Mobile Home
 City, State, ZIP+4 Columbus OH 43209 Park
 PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <u>Marilyn Cole</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>Marilyn Cole</u> C. Date of Delivery <u>7/14/11</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>MR STUART COLE BROOKVILLE LAKE ESTATES MOBILE HOME PARK 2526 STAFFORD PLACE COLUMBUS OH 43209</p>	<p><input checked="" type="checkbox"/> Registered Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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