



State of Ohio Environmental Protection Agency

**Northeast District Office**

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

June 28, 2007

RE: TRUMBULL COUNTY  
BROOKFIELD TOWNSHIP  
BROOKFIELD ACRES MOBILE HOME PARK  
NPDES PERMIT NO. OH0101362  
OHIO EPA PERMIT NO. 3PV00056

Mr. David Hale, Regional Manager  
RHP Properties  
31200 Northwestern Hwy  
Farmington Hills, MI 48334

On June 21, 2007, an inspection was conducted at the above referenced facility by the undersigned. The facility was represented by Mr. Dale Appis, Community Manager. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

We understand that RHP Properties acquired ownership of the park in May 2006. As discussed with you via telephone, an application to transfer the NPDES permit should have been filed at that time pursuant Ohio Administrative Code 3745-33-04(E). The application, available online at <http://www.epa.state.oh.us/dsw/permits/npdesform.html>, should be submitted to this office as expeditiously as practicable.

**Inspection Findings/Compliance Status**

The wet-stream treatment components consist of preliminary treatment (trash trap), flow equalization basin, 65,000-gpd extended aeration activated sludge treatment process, final settling tank, tertiary sand filtration, and UV disinfection. Sludge handling consists of an aerated sludge holding tank.

At the time of the inspection, the following observations and comments were noted:

1. The general operation and maintenance of the treatment plant appeared to be satisfactory. The effluent being discharged at the UV chamber was visually clear.
2. Please ensure that the flow meter is calibrated on a yearly basis by a certified technician.
3. The accumulated sludge in the former chlorine contact tank must be removed. Please ensure that the facility follows regimented sludge wasting and filter backwash schedules in order to control this potential problem.
4. The accumulated "spent" sand outside of the control building must be removed. The facility should endeavor to reduce/eliminate the need for removal of sand from the filters by making adjustments to the backwash intervals.

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A review of the monthly operating reports received by Ohio EPA for the period January 2006 through May 2007 indicates violations of the effluent limitations contained in the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2006	001	Dissolved Oxygen	1D Conc	5.0	4.6	12/13/2006
February 2007	001	Total Suspended Solids	30D Conc	12	12.5	2/1/2007
April 2007	001	Total Suspended Solids	30D Conc	12	16.5	4/1/2007
October 2006	001	Total Suspended Solids	7D Conc	18	22.5	10/8/2006
February 2007	001	Total Suspended Solids	7D Conc	18	24.	2/22/2007
March 2007	001	Total Suspended Solids	7D Conc	18	20.	3/1/2007
April 2007	001	Total Suspended Solids	7D Conc	18	49.	4/15/2007
October 2006	001	Total Suspended Solids	7D Qty	4.4	5.2	10/8/2006
October 2006	001	Total Suspended Solids	7D Qty	4.4	4.4	10/15/2006
April 2007	001	Total Suspended Solids	7D Qty	4.4	5.4	4/15/2007

In addition to the above, our review of the facility's data reporting procedures noted the following:

1. We understand that Mr. Dwane Stull has been routinely submitting electronic monthly operating reports for the facility. Pursuant to Part III of the NPDES permit, all reports submitted to the director shall be signed and certified in accordance with the requirements of 40 CFR 122.22. As such, reports for companies can only be signed and certified by a corporate officer, general partner, proprietor, or by a duly authorized representative of said individual. Pursuant to 40 CFR 122.22 (b):

***A person is a duly authorized representative only if:***

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***
- (3) The written authorization is submitted to the Director.***

Copies of all reports, and substantiating documentation, shall be maintained on site for a period of at least three years.

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2. Ohio Administrative Code (OAC)3745-7-02 requires that you have a contract with your certified operator. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the services (i.e., **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of the contract for submission of Monthly Operating Reports.
3. The facility currently utilizes North Coast Environmental Laboratories, Inc., Streetsboro, for the analyses of Total Suspended Solids, CBOD, Ammonia-N, and Fecal Coliform. The facility shall ensure that detailed analytical reports, including a complete chain of custody record, are received from its contract laboratory.
4. Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures shall be developed for all analyses performed on site, e.g., pH, DO, etc. Calibration records must be maintained for all in-house analytical instrumentation.

**Summary/Conclusion**

Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above referenced violations and/or deficiencies. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mt

cc: Dale Appis, Brookfield Acres Mobile Home Park