



**Environmental
Protection Agency**

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

December 15, 2011

Mr. David Baril, Club Manager
Brown's Run Country Club
6855 Sloebig Road
Middletown, Ohio 45042

Re: Butler County, Brown's Run Country Club, Compliance Evaluation Inspection

Dear Mr. Baril:

On December 12, 2011, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0085669; OEPA Permit No. 1PR0002*BD). Representing this facility was Mike Harris. A copy of my inspection report is enclosed.

The inspection report contains one marginal area. The Operation & Maintenance section was rated marginal as a result of the noted operational deficiencies with the trash trap, sludge wasting and tertiary treatment.

The areas noted in the report summary will require a written response by January 6, 2012. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosures



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
1PR00002*BD	OH0085669	12/12/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brown's Run Country Club 6855 Sloebig Road Middletown, Ohio 45042	9:30 A.M.	11/1/2007
	Exit Time	Permit Expiration Date
	10:30 A.M.	10/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mike Harris, Maintenance	(513) 423-9401	
Name, Address and Title of Responsible Official	Phone Number	
David Baril, Club Manager 6855 Sloebig Road Middletown, Ohio 45042	(513) 423-9401	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedule
M	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
12/15/11 Date	12/15/11 Date

Permit #: 1PR00002*BD

NPDES #: OH0085669

Average Daily Design Flow:	8000 Gallons/Day
Plant Serves:	Golf Course / Club House / Swimming Pool
Average Daily Flow: (Period of Review):	2488 Gallons/Day (October 2009 through October 2011)
Method of flow monitoring:	Dosing pump elapse time meters.
Type of alarms for plant:	High Water Alarms

Pretreatment

Type of Pretreatment: **Trash Trap**
Does the Trash Trap need pumped: **Yes**
Maintenance of pretreatment components is: **Poor**

Comments/Status:

See Attached Summary of Findings / Comments.

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
Quality of Sludge: **Thin**
Foam: **Light (white)**
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 checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Good**

Comments/Status:

None.

**Secondary Treatment
(Settling)**

Clarity: **Clear**
Condition of Weir: **Clean**
Weir is level: **Yes**

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Effluent in weir: **Clear**
Clarifier walls need scraped: **No**

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

Comments/Status:

None.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Fair**

Comments/Status:

See Attached Summary of Findings / Comments.

Sludge Handling/Storage Disposal

Hauler name: **Accurite Sewage and Drain Cleaning**
Disposal Site: **Butler County LeSourdsville WWTP**
Sludge wasted from: **Trash Trap and Sludge Holding Tank**
How often is sludge wasted: **As Needed**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Poor**

Comments/Status:

See Attached Summary of Findings / Comments.

Plant Discharge

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

Comments/Status:

None.

Permit #: 1PR00002*BD

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Summary of Findings / Comments

Areas Requiring a Response

A security fence has not been provided for the WWTP. Brown's Run Country Club (Brown's Run) must immediately install a security fence.

An annual sludge disposal report is required to be submitted by January 31 of each following year. This requirement is addressed in the NPDES Permit in Part II, Section N. Brown's Run has failed to submit the annual reports for 2009 and 2010. These reports must be submitted. The annual report form may be obtained at the following web site: http://www.epa.state.oh.us/portals/35/sludge/ASR_Form_4229_2011.pdf.

Areas Not Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) for October 2009 through October 2011 indicated several NPDES Permit violations. These violations are listed on Attachment I. Brown's Run has adequately addressed these violations. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The WWTP consists of a trash trap, a flow equalization basin, an aeration tank, a secondary clarifier, a dosing tank, two surface sand filters, a chlorine contact tank, and a dechlorination tank. A sludge holding tank is also provided. Finally, a grease trap is also provided for the kitchen. The grease trap is pumped once every other month.

The WWTP is required to be under the supervision of a Class I operator. The previous operator was let go two years ago. Mike Harris is a limited Class A wastewater operator. Since taking over the wastewater operations, the WWTP operation and maintenance program has been marginal. The trash trap has not been pumped in the past two years. The trash trap should typically be pumped out once every three months. For the past two years, sludge has not been wasted from the clarifier to the sludge holding tank nor hauled from the site. The wastewater has been only dosed to one surface sand filter in the past two years. Typically, the filters would be switched once every several months or when the wastewater started to pond on the filter. Finally, the filter currently being used needs to be cleaned and the surface raked flat. To assist in the proper WWTP operation and maintenance, I have the following information or recommendations:

1. A copy of the "Operation and Maintenance Guide for Owners of Package Extended Aeration Sewage Treatment Plants" is enclosed.
2. A web link for a copy of the "Controlling the Activated Sludge System" & "Conversion and Separation Chart" that may be informative may be obtained at: http://www.epa.ohio.gov/dsw/compl_assist/ProcessControl.aspx.
3. Finally, a copy of the approved detailed plans of your WWTP is enclosed.

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The WWTP effluent is monitored by grab samples. The grab samples with the exception of the dissolved oxygen are placed on ice and immediately taken to the Middletown WWTP where they are tested.

The current NPDES Permit expires on October 31 2012. The NPDES Permit renewal application will be required to be submitted by April 30, 2012. In addition, the NPDES Permit renewal will limit E. coli instead of fecal coliform. The new E. coli limits will be 126 #/100ml for the monthly average and 284 #/100ml for the weekly average. We recommend monitoring E. coli several times next summer to make sure the current disinfection system is adequate. Finally, the NPDES Permit renewal will require the WWTP be under the supervision of a Class A wastewater operator.

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NPDES #: OH0085669

Attachment 1
Brown's Run Country Club
Effluent Limit Violations for October 2009 through October 2010

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Observed Value
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December 2009	CBOD5	Monthly	mg/l	10	12
June 2010	Ammonia	Monthly	mg/l	1.0	3.0
June 2010	Ammonia	Monthly	kg/day	0.030	0.031
June 2010	Ammonia	Weekly	mg/l	1.5	3.0
June 2010	Chlorine	Daily	mg/l	0.019	0.28