



**Environmental
Protection Agency**

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

May 30, 2012

Sharon Crist, Owner
Brookdale MHP
1795 Brookdale Road
Lancaster, OH 43130

**Re: Brookdale MHP
NPDES Permit 4PV00121/ OH0136298
Compliance Evaluation Inspection
Fairfield County**

Dear Ms. Crist:

On May 22, 2012, a Compliance Evaluation Inspection was conducted at the Brookdale MHP. Present for the inspection were Jeff Hickman and Robert Flowers representing Brookdale MHP, and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The following important item was discussed during the inspection:

- ❖ Effluent flow is determined via potable water usage records. At times, leaks in the potable water distribution system provide a false indication of high discharges from the wastewater treatment plant (WWTP) as noted in the flow data table in the attachment. Since the WWTP is a Class A facility, potable water use values are permissible to use to report effluent flow. However, the facility may wish to determine effluent flow in another fashion and reduce or eliminate the chance for permit limit violations due to inaccurate loadings calculations. The recommended method for calculating effluent flows would be for the facility to install a timer on the sand filter dosing pump and calculate flows based on the pump rating and running time.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely,

Paul L. Vandermeer
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Paul L. Vandermeer

PV/nsm Brookdale MHP

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

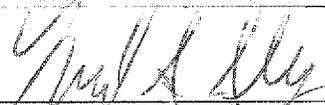
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PV00121	OH0136298	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/22/2012	9:15 AM	10:05 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Brookdale MHP 1795 Brookdale Rd. Lancaster, OH 43130	1/1/2012
	Permit Expiration Date
	12/31/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Jeff Hickman, Operator Robert Flowers, Maintenance Supervisor	(614) 570-9807
Name and Title of Responsible Official	Phone Number
Sharon Crist, Owner	(740) 654-4951

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	No violations for last 14 months.
S	Operations & Maintenance	Plant is well cared for.
S	Facility Site Review	
S	Collection System	New sewer main installed recently.
S	Flow Measurement	Facility might want to consider using dosing pump timer to determine effluent flow.
N	Receiving Waters	Flow goes to storm sewer.
S	Laboratory	MASI Laboratory performs most analyses.

Comments:

Signatures			
	5/30/12		5/30/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

Compliance Data for Brookdale MHP between 5/1/2010 to 5/1/2012

Summary

Permit Effluent Limit Violations: 3
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 0
 Compliance Schedule Violations: 0

Limit Violations						
Ref	Violation Code	Parameter	Unit	Actual	Limit	Date
March 2011	001	CBOD 5 day	30D Conc	10	22.	3/1/2011
March 2011	001	CBOD 5 day	7D Conc	15	22.	3/1/2011
March 2011	001	CBOD 5 day	30D Qty	0.31	.43051	3/1/2011

Flow Data for Brookdale MHP between 5/1/2010 and 5/1/2012

	Date	Flows (GPD)
Ten Highest Flows	10/9/2011	10420
	10/10/2011	10020
	3/21/2012	9670
	12/26/2010	9620
	10/3/2011	9360
	10/7/2011	9140
	7/28/2011	9030
	10/11/2011	8920
	4/30/2011	8870
	9/12/2011	8870
Average Flow Rate		5914

SECTION D: PERMIT VERIFICATION

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters Y
- (c) Products and production rates conform with permit application NA
- (d) Flows and loadings conform with NPDES permit Y
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process added since last inspection N
- (g) Notification given to State of new, different or increased discharges NA
- (h) All discharges are permitted Y
- (i) Number and location of discharge points are as described in permit Y

Comments:

SECTION E: COMPLIANCE

- (a) Any significant violations since the last inspection N
- (b) Permittee is taking actions to resolve violations Y*
- (c) Permittee has a compliance schedule N
- (d) Permittee is meeting compliance schedule N

Comments: *Last permit limit violations were in March 2011. There have been no violations since that time.

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? *Gasolene generator, 5250 Watts*
- (b) Adequate alarm system available for power or equipment failures Y*
- (c) All treatment units in service other than backup units Y
- (d) Wastewater Treatment Works classification A
- (e) Operator of Record holds unexpired license of class required by Permit Y
Class held: III
- (f) Copy of certificate of Operator of Record displayed on-site NA^
- (g) Minimum operator staffing requirements fulfilled Y
- (h) Routine and preventative maintenance scheduled and performed Y
- (i) Any major equipment breakdown since last inspection N
- (j) Operation and maintenance manual provided and maintained NA
- (k) Any plant bypasses since last inspection N
- (l) Regulatory agency notified of bypasses NA
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection N

Comments: *When electricity is out to the WWTP, it is out to the entire park. The water system also does not run, so flow to the plant during a power outage is limited.

^There is no place to post the certificate as the plant has no buildings or protected areas.

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book hard bound book
- c) Log book(s) kept onsite in an area protected from weather Y
- d) Log book contains the following:
 - i) Identification of treatment works Y
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 Y
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) Y
 - iv) Laboratory results (unless documented on bench sheets) NA
 - v) Identification of person making log entries Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... NA

Comments:

SECTION H: COLLECTION SYSTEM

- a) Percent combined system: 0%
- b) Any collection system overflows since last inspection N
 CSO SSO
- c) Regulatory agency notified of overflows NA
- d) CSO O&M plan provided and implemented. NA
- e) CSOs monitored and reported in accordance with permit..... NA
- f) Portable pumps are used to relieve system N
- g) Lift station alarms provided and maintained..... NA
- h) Lift stations equipped with permanent standby power or equivalent..... NA
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection. N*
- j) Any complaints received since last inspection of basement flooding NA
- k) Are any portions of the sewer system at or near capacity..... N
- l) Are operations changed during high-flow events? N

Comments: *High flow events noted in the flow data table above are due to leaks in the potable water system accompanied by the estimation of effluent flow by potable water use in the MHP. See discussion in body of cover letter.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge adequately disposed Y
Method: *Hauled to Lancaster WWTP*
- b) If sludge is incinerated, where is ash disposed of NA
- c) Is sludge disposal contracted Y
Name: *Green's Septic Service hauls sludge to Lancaster WWTP*
- d) Has amount of sludge generated changed significantly N
- e) Adequate sludge storage provided at plant Y
- f) Records kept in accordance with State and Federal law Y*
- g) Any complaints received last year regarding sludge NA
- h) Is sludge adequately processed (digestion, pathogen control) Y^

Comments: *By June 22, 2012, the facility shall provide a copy of the latest manifest from Green's to Paul Vandermeer indicating sludge was hauled and disposed at the Lancaster WWTP. ^Sludge processing occurs at Lancaster WWTP.

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained Y
Type of device: *Potable water meter* Device location: *Well head*
- b) Calibration frequency adequate N*
Date of last calibration: *Unknown*
- c) Secondary instruments operated and maintained NA
- d) Flow measurement equipment adequate to handle full range of flows Y
- e) Actual flow discharged is measured N^
- f) Flow measuring equipment inspection frequency *twice per week*
- g) Sampling location(s) are as specified by permit Y
- h) Parameters and sampling frequency agree with permit Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) Y

Comments: *Facility shall provide calibration records for the flow meter to Paul Vandermeer by June 22, 2012. ^See discussion in body of letter regarding use of a dosing pump timer to measure effluent flow.

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) Y
- b) If alternate procedures are used, are they properly approved? Y
- c) Analysis performed more frequency NA
If yes, are results recorded in permittee's report? NA
- d) Commercial laboratory used:
Name: *MASI Laboratory*
Parameters analyzed: *All but temperature and dissolved oxygen*

- e) Quality assurance manual provided and maintained NA
- f) Calibration and maintenance of instruments is satisfactory? Y*

Comments: *Dissolved oxygen probe is calibrated before sensor is used for sample.

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No*	None	None	None	None	None	Clear	

Comments: *Outfall goes to a storm sewer which daylights some distance away on private property (not owned by the facility). Sign will be posted at the WWTP on the outside of the fence instead.

SECTION M: MULTIMEDIA OBSERVATIONS

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories N
- b) Do you notice staining or discoloration of soils, pavement or floors N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks N
- e) Do you notice any unusual odors or strong chemical smells N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: