



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 2, 2012

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

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

Dear Mr. Hale:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on June 26, 2012. Access to the facility was granted by Mr. Curt Holmes. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The existing treatment components consist of a trash trap, flow equalization basin, 65,000-gpd extended aeration package plant, final settling tank, slow surface sand filters, and UV disinfection. Sludge handling consists of an aerated sludge holding tank. Treated effluent is discharged to an unnamed tributary of Little Yankee Run.

During the inspection, the following observations and/or deficiencies were noted:

1. It appeared that a trench had been dug on the north side of the sand filter building. Black sand and what appeared to be wastewater were observed in the trench. This material and water were also observed discharging near the receiving stream. Per a recent conversation with Facility Manager, Mr. Dale Appis, this office understands that a waterline had ruptured, causing the need for excavating in the immediate area to locate the break. Please provide documentation describing the origin of the turbid water observed in the trench.

Additionally, Mr. Appis explained that used filter sand is being used as fill for the recently excavated trench. Used filter sand cannot be stockpiled on site or used for fill material. It must be hauled away as a waste material or recycled. Please ensure that all the used sand that was used as fill material for the trench is removed and properly disposed of, and clean, acceptable fill used to fill in the trench.

2. Foaming was observed in the aeration tank.
3. Heavy algal growth was observed in the clarifier.

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4. Please provide a description of how samples are taken, stored, and transported to your laboratory for analysis. Additionally, please provide a copy of maintenance and calibration records for the last three years for any instrumentation used to analyze any monitoring parameters in the field.
5. Please provide documentation describing when the flow meter was last calibrated.
6. A bound and numbered logbook should be used to record all operation and maintenance activities at the plant. Loose sheets are not an acceptable method of recording operation and maintenance activities. Plant operation and maintenance personnel shall record the date, arrival/departure times, a description of the work performed, and their initials.

A review of the monthly operating reports received by Ohio EPA for the period April 2009 through May 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

| Reporting Period | Station | Reporting Code | Parameter               | Limit Type | Limit | Reported Value | Violation Date |
|------------------|---------|----------------|-------------------------|------------|-------|----------------|----------------|
| August 2010      | 001     | 00530          | Total Suspended Solids  | 1D Conc    | 18    | 20.            | 8/26/2010      |
| September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3) | 1D Conc    | 3.0   | 4.93           | 9/7/2010       |
| September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3) | 1D Qty     | 0.74  | 1.0263         | 9/7/2010       |
| March 2011       | 001     | 00530          | Total Suspended Solids  | 30D Conc   | 12    | 13.4           | 3/1/2011       |
| June 2011        | 001     | 00530          | Total Suspended Solids  | 1D Conc    | 18    | 54.            | 6/23/2011      |
| June 2011        | 001     | 00530          | Total Suspended Solids  | 1D Qty     | 4.5   | 11.4458        | 6/23/2011      |
| July 2011        | 001     | 00530          | Total Suspended Solids  | 1D Conc    | 18    | 23.            | 7/27/2011      |
| August 2011      | 001     | 31616          | Fecal Coliform          | 1D Conc    | 2000  | 2000.          | 8/9/2011       |

| Reporting Period | Station | Reporting Code | Parameter              | Sample Frequency | Expected | Reported | Violation Date |
|------------------|---------|----------------|------------------------|------------------|----------|----------|----------------|
| April 2009       | 001     | 00010          | Water Temperature      | 1/Day            | 1        | 0        | 04/17/2009     |
| October 2009     | 001     | 00530          | Total Suspended Solids | 1/Week           | 1        | 0        | 10/08/2009     |
| October 2009     | 001     | 80082          | CBOD 5 day             | 1/Week           | 1        | 0        | 10/08/2009     |
| October 2009     | 001     | 00400          | pH                     | 1/Week           | 1        | 0        | 10/08/2009     |
| October 2009     | 001     | 00300          | Dissolved Oxygen       | 1/Week           | 1        | 0        | 10/08/2009     |

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Please inform this office, in writing, within 14 days' receipt of this notification, as to the actions that have been taken or proposed to address the above-referenced violations and/or deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. 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 at 330-963-1120.

Respectfully,



Tomás Parry, P.E.  
Environmental Engineer  
Division of Surface Water

TP:bo

Attachments: photographs

pc: Dale Appis, Brookfield Acres Mobile Home Park  
Josh Goodridge, B&J Environmental, Inc.

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