



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

November 1, 2012

Mr. Bruce Hellman, President
BRG Timber Ridge Holding Company, LLC
10875 Indeco Drive
Cincinnati, OH 45241

**RE: Hamilton County, Timber Ridge Apartments
Compliance Evaluation Inspection and
Notice of Violation**

Dear Mr. Hellman,

As part of the permit renewal process, I performed a Compliance Evaluation Inspection at Timber Ridge Apartments (NPDES Permit No. OH0047376; OEPA Permit No. 1PW00011*FD). The inspection was performed on October 15, 2012, and a copy of the inspection report has been included with this letter for your use. This letter also serves as a Notice of Violation. The following violations were discovered during the inspection:

- It was noted during the inspection that all of the operation and maintenance records were not being recorded in the logbook. Please be advised that this practice is in violation of Ohio Administrative Code 3745-7-09 "Recordkeeping requirements and responsibilities of a certified operator".
- It was also discovered that the operator of record certifications are not being displayed at the facility as required in Ohio Administrative Code 3745-7-05.
- Permit 1PW00011*FD Part II, Item D requires the permittee to maintain the facility in good working order. The facility is missing several sections of grating and the waste sludge tanks are no longer functional due to their poor condition.

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 discuss the expiration of NPDES permit 1PW00011*FD on November 30, 2012. In a letter dated September 1, 2009, you were notified that Timber Ridge Apartments was to connect to publically owned sewers no

Timber Ridge Apartments

November 1, 2012

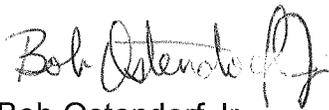
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later than March 10, 2010. You were also notified in said letter that Ohio EPA would not be able to renew permit 1PW00011*FD due to the renewal being in conflict with the areawide waste treatment management plan adopted in accordance with section 208 of the Federal Water Pollution Control Act (Ohio Revised Code 6111.03(J)(2)(b)). Your representative stated in a letter dated March 1, 2010, that you would be willing to complete the connection to public sewers no later than November of 2012. As a condition of the agreed upon date for connecting to publically owned sewers, you were to submit a proposed timeline to Ohio EPA no later than April 30, 2010. Ohio EPA has not received a proposed timeline regarding this matter.

At the time of the inspection, Timber Ridge Apartments had not submitted a Permit to Install application for the connection to publically owned sewers. Ohio Revised Code 6111.03(J)(2)(b) prohibits the renewal of permit 1PW00011*FD and said permit expires on November 30, 2012. I would like to take this opportunity to inform you that the unpermitted discharge of pollutants to waters of the state is a violation of Ohio Revised Code 6111.04. Please inform this office, in writing, within ten days of receipt of this letter as to the actions which will be taken by Timber Ridge Apartments to address this matter.

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.
Environmental Specialist
Division of Surface Water
Permits Section

BOJ/tf

Enclosure

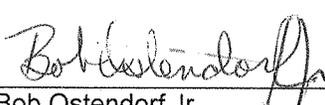
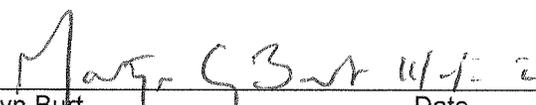


State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PW00011*FD	OH0047376	10/15/12	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Timber Ridge Apartments 11600 Timber Ridge Lane Cincinnati, OH 45241	09:40	December 1, 2007
	Exit Time	Permit Expiration Date
	10:10	November 30, 2012
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Mr. Andy Griner, Winelco Inc.		(513) 755-8050
Name(s), Address and Title(s) of Operator of Record		Phone Number(s)
Robert Armstrong	WW1-1015880-98	(513) 755-8050
Robert Gomez Jr	WW1-1065576-05	
Andrew Griner	WW1-1010126-94	
Greg Ross	WW3-1013587-96	
Michael J Ullman	WW3-1007257-83	
Eric M Gibson	WW1-1118936-11	
Robert J Reckers	WW3-1011944-83	
Name, Address and Title of Responsible Official		Phone Number
Mr. Bruce Hellman, President		(513) 936-5960

Ohio EPA Inspector	Ohio EPA Reviewer
 Bob Ostendorf Jr. Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
11-1-12 Date	11-1-12 Date

Permit # : 1PW00011*FD
 NPDES #: OH0047376

Average Daily Design Flow:	80,000 Gallons/Day
Plant Serves:	Apartment Complex
Average Daily Flow: (Period of Review):	18,600 Gallons/Day (September 2011 – September 2012)
Method of flow monitoring:	Elapsed Time Meter
Type of alarms for plant:	High water level in EQ (Visual Only)

Pretreatment

Type of Pretreatment: **Bar Screen**
 Does the Trash Trap need pumped: **N/A**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

During the inspection, it was discovered that the facility originally had a flow meter installed but sometime in the past a decision was made to remove the flow meter and use elapsed time meters to determine flow.

**Secondary Treatment
(Aeration)**

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

Maintenance of aerating equipment is...**Poor**

Comments/Status:

Aeration tanks missing sections of grating. Overall condition of aeration tanks is poor due to age and corrosion (rust). Due to the poor condition of the tanks, the integrity of the tanks comes into question.

**Secondary Treatment
 (Settling)**

Clarity: **Clear**
 Condition of Weir: **Clean**
 Weir is level: **Yes**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **No**

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

Comments/Status:

Clarifier is in poor condition due to age and corrosion (rust).

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 type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Good**

Comments/Status:

Sludge Handling/Storage Disposal

Hauler name: Winelco, Inc.
 Disposal Site: MSD Gest Road
 Sludge wasted from: Clarifier
 How often is sludge wasted: Weekly
 Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Poor**

Comments/Status:

Waste tanks out of service due to age and corrosion (rust). The facility wastes approximately 4,000 gallons of activated sludge per week.

Permit # : 1PW00011*FD
NPDES #: OH0047376

EFFLUENT LIMIT VIOLATIONS
(Period of Review: September 1, 2011 – September 1, 2012)

No violations were discovered for the period of time reviewed.