



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

July 8, 2013

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

Mr. Brian Burson, Regional Manager
RHP Properties
31200 Northwestern Hwy
Farmington Hills, MI 48334

Mr. Burson:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on June 17, 2013. Mr. Dale Appis represented the facility and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's overall compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The existing treatment system consists of a trash trap, aerated flow equalization basin, 65,000-gpd extended aeration package treatment process, final settling tank, rapid sand filters, and UV disinfection. Waste-activated sludge is stored in an aerated sludge holding tank until it is hauled away for final disposal. Treated effluent is discharged to an unnamed tributary of Little Yankee Run.

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

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment units appeared to be in working condition.
2. Slight foaming was observed in the aeration tank.
3. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
4. Some floating sludge was observed in the clarifier. Additionally, the sludge blanket appeared to be elevated.
5. The outfall marker was not erected at Outfall 001, as is required in the NPDES permit. Mr. Appis explained that there had been issues with the sign being vandalized. The sign was onsite, and Mr. Appis later provided a follow-up email (with a color photograph) indicating that the sign had been re-erected. Please note that outfall markers must face the receiving stream.
6. The final effluent being discharged through Outfall 001 appeared to be clear, and was not causing any immediately-noticeable, adverse impacts to the receiving stream.

A review of the monthly operating reports received by Ohio EPA for the period June 2012 – May 2013 indicated no violations of the terms and conditions contained in the NPDES permit. However, the electronic Discharge Monitoring Report (eDMR) review did indicate that the facility has almost exclusively been reporting CBOD values of 2.0 mg/L. In conversation with your operator, Mr. Josh Goodridge, and Geauga County Laboratories, it was determined that the laboratory has been

reporting the method detection limit for values that are below the detection limit. Please note that values below detection limit should be reported as "AA" on the eDMR page. The method detection limit must also be reported. Please ensure that the past eDMR entries are revised in accordance with these requirements.

A review of the O & M logbook also indicated time periods where it did not appear that your certified operator was visiting the treatment works 3 times a week for a minimum of 1.5 hours total as is required in Ohio Administrative Code 3745-7-04 for Class "I" treatment facilities. Please ensure that your plant operator is meeting the minimum time requirements, and recording them in the O & M logbook.

This office has received an NPDES permit renewal application, and will be processing it for re-issuance. Once the renewal permit has been drafted, it will be public-noticed for 30 days. Comments on the draft permit should be made in writing, and submitted to Ohio EPA within 30 days of the public notice date. If comments are received, Ohio EPA will address them prior to issuing the permit as a final action.

There will be a number of changes made to the NPDES permit. One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits.

The permittee will also be required to begin monitoring for Nitrite and Nitrate, Phosphorus, Total Dissolved Solids (TDS), and Total Kjeldahl Nitrogen (TKN). Monitoring requirements for all new parameters will be described in the new permit.

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/cs

Attachments: Photographs

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

