



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PV0009620080818

HAMILTON RIVERVIEW CROSSING WWTP

OSIKA, MARY

2008/08/18



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

August 18, 2008

Barbara Leatherman
Holiday Homes
1252 Goshen Pike
Milford, Ohio 45150

RE: COMPLIANCE EVALUATION INSPECTION
RIVERVIEW CROSSING MHP, HAMILTON CO.
NPDES PERMIT 1PV00096*BD

Dear Ms. Leatherman:

On July 23, 2008, I met with Dennis Feichtner and inspected the sewage treatment plant serving the Riverview Crossing MHP located along Lawrenceburg and Sand Run Roads. A copy of my inspection form is attached for your review.

Most areas evaluated were satisfactory, however the Operations and Maintenance section was rated marginal due to issues regarding the log book and the Self Monitoring Program was rated unacceptable due to samples not being refrigerated during compositing. A response to this inspection is required within ten days receipt of this letter discussing the actions taken to come into compliance with the Operator Certification regulations regarding the log book and the proper sampling requirements for composite samples. The NPDES application is overdue; please respond to this issue.

If you have any questions regarding this letter or the inspection findings, please contact me at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

Enclosure

Cc: Dennis Feichtner, Pollution Associates





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Summary of Findings

For the review period of July 2007 through June 2008, there have been 23 pH violations. During this same period, there was 5 Dissolved Oxygen violations. The cause of the violations have been attributed to a filamentous bacteria problem in the aeration tank which is then periodically chlorinated to reduce the filamentous problem.

A NPDES renewal application was due 180 days prior to expiration on July 31, 2008. This has not been received in the Southwest District Office. The late application is also considered a permit violation.

The average flow rate for the past year has been approximately 40,000 gpd. The treatment plant is designed for 120,000 gpd.

Operator log book must have date/time entry and departure of operator at WWTP. Log book must have entries regarding all O & M work done listing specific date/time. Other maintenance people should also make entries regarding their work.

Samples need to be refrigerated during compositing. Operator was not doing this. A refrigerator is needed at the wastewater treatment plant to keep the composite samples at the proper temperature during compositing.

During the inspection, operator was doing maintenance on the aeration tank diffused air piping system. Electrolysis had occurred, damaging a section of pipe.





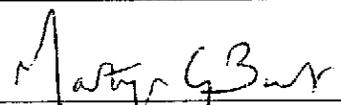
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00096*BD	OH0118974	7/23/2008	Compliance	State	Semi-public

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Riverview Crossing Manufactured Home Park Lawrenceburg and Sand Run Roads Whitewater Township, Ohio	12:45 pm	February 1, 2004
	Exit Time	Permit Expiration Date
	1:25 pm	January 31, 2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Dennis Feichtner, contract operator	(812) 584-5509	
Name, Address and Title of Responsible Official	Phone Number	
Barbara Leatherman, Manager Holiday Homes 1252 Goshen Pike Milford, Ohio 45150	(513) 575-0100	

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	S	Laboratory	N	Compliance Schedule
M	Operations & Maintenance	S	Effluent/Receiving Waters	U	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.	
Inspector	Reviewer
 8/18/08 Date	 8/18/08 Date
Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit # : Error! Reference source not found.
NPDES #: Error! Reference source not found.OH0118974

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

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

Comments/Status:

Barbara Leatherman is the new contact person for Holiday Homes.

Section F: Permit Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

For review period July 2007 through June 2008, there have been 23 pH violations. During this same period, there was 5 Dissolved Oxygen violations.

A NPDES renewal application was due 180 days prior to expiration on July 31, 2008. This has not been received in the Southwest District Office.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (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 (OAC 3745-7)..... II
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained.... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

hard bound
- (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..... N
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (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 N
- (k) Are any portions of the sewer system at or near capacity..... Y

Comments/Status:

Log book must have date/time entry and departure of operator at WWTP. Log book must have entries regarding all O & M work done listing specific date/time. Other maintenance people should also make entries regarding their work.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: _____ Approval #: _____ Not submitted N/A
- (b) Sludge management plan current..... Y
(c) Sludge adequately disposed..... Y
(Method: hauled to MSD)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... Y
(Name: Perfect A Waste)
(f) Has amount of sludge generated changed significantly since
last inspection..... N
(g) Adequate sludge storage provided at plant..... Y
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... Y
(j) Any complaints received in last year regarding sludge..... N
(k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify: _____)
- (b) Calibration frequency adequate Y
(Date of last calibration: _____)
(c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

The average flow rate for the past year has been approximately 40,000 gpd.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... N
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) 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
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... Y
 - (c) Analyses being performed more frequently than required by permit. N
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: all

Lab name: Pollution Associates and Belmont Labs

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... N/E
 - (g) Satisfactory calibration and maintenance of instruments/equipment. N/E
 - (h) Adequate records maintained..... N/E
 - (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
- Date: N/A

Comments/Status:

Samples need to be refrigerated during compositing.

Permit # : Error! Reference source not found.
 NPDES # : Error! Reference source not found.OH0118974

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	no							

Comments/Status:

Effluent viewed at treatment plant. Outfall is behind houses along Whitewater River.

Section K: 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/Status:

