



**Environmental
Protection Agency**

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



1PV0009620100719

HAMILTON RIVERVIEW CROSSING WWTP

SARLE, EDWARD

2010/07/19



**Environmental
Protection Agency**

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

July 20, 2010

Mr. Paul Ritter, Vice President
Holiday Homes
1252 Goshen Pike
Milford, Ohio 45150

Re: Hamilton County, Riverview Crossing MHP, Compliance Evaluation Inspection

Dear Mr. Ritter:

On July 8, 2010, Martyn Burt and I conducted a Compliance Evaluation Inspection at the Riverview Crossing MHP (NPDES Permit No. OH0118974; OEPA Permit No. 1PV00096*CD). Representing this facility was Joe Magee and Dennis Feichtner. A copy of my inspection report is enclosed.

The inspection report contains two marginal areas. The Effluent / Receiving Waters section was rated marginal as a result of the NPDES Permit violations and the reported septic discharges over the July 4 weekend. The Operations and Maintenance section was rated marginal as a result of the events leading to the July 4 weekend WWTP discharge and the general WWTP operations.

The areas noted in the report summary will require a written response by August 6, 2010. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

ec: Greg Cassiere, Hamilton County General Health District



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*CD	OH0118974	7/8/2010	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Riverview Crossing MHP 5002 Lawrenceburg Road Harrison, Ohio	9:30 A.M.	3/1/2009
	Exit Time	Permit Expiration Date
	10:45 A.M.	2/28/2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Joe Magee, Park Maintenance Dennis Feichtner, Contract Operator	(513) 353-9681 (812) 584-5509	
Name, Address and Title of Responsible Official	Phone Number	
Paul Ritter, Vice President 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	N	Laboratory	S	Compliance Schedule
M	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
See Attached Summary of Findings / Comments.			
Inspector		Reviewer	
<i>Ned Sarle</i>	7/20/10	<i>Martyn Burt</i>	7/20/2010
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	Date

Permit #: 1PV00096*CD
 NPDES #: OH0118974

Average Daily Design Flow:	120,000 Gallons/Day
Plant Serves:	Mobile Home Park
Average Daily Flow: (Period of Review):	42,000 Gallons/Day (March 2009 through May 2010)
Method of flow monitoring:	V-notch weir and ultrasonic meter
Type of alarms for plant:	Audio / visual and autodialer

Pretreatment

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

Comments/Status:

Pretreatment is provided by an hydroscreen.

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Medium**
 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...**Fair**

Comments/Status:

None.

**Secondary Treatment
(Settling)**

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

Permit #: 1PV00096*CD
NPDES #: OH0118974

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

Comments/Status:

None.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Poor**

Comments/Status:

Hydrotech disk filters provided - See Attached Summary of Findings / Comments.

Sludge Handling/Storage Disposal

Hauler name: **Perfect-a-Waste**
Disposal Site: **MSD Mill Creek WWTP**
Sludge wasted from: **Secondary clarifier return sludge**
How often is sludge wasted: **Daily**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

In 2009, 1.07 dry tons hauled from WWTP.

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Whitewater River**
Discharge is visible: **Yes** Quality of Effluent: **Cloudy**

Comments/Status:

Slight solids noted in WWTP discharge. WWTP discharge sign is posted as required.

Permit #: 1PV00096*CD

NPDES #: OH0118974

Summary of Findings / Comments

Areas Requiring a Response

The WWTP consists of an influent pump station, a hydroscreen, two extended aeration basins, two secondary clarifiers, a disk filter and an ultraviolet disinfection system. An aerated sludge holding tank is also provided.

The disk filter was installed in April 2004 to replace a rapid sand filter that did not operate correctly. However, the disk filter has not operated correctly either and has not been used for the past several years. Please clearly indicate why it has been a problem to operate this filter. The Riverview Crossing MHP must take all feasible action to resume the operation of this filter.

The facility is required to be under the supervision of a Class II wastewater treatment plant operator. Dennis Feichtner is the Operator of Record and is a Class III operator. An Operator of Record Form must be submitted by Dennis Feichtner. A copy of this form may be downloaded at the following web site: [http://www.epa.state.oh.us/portals/28/documents/opcert/Operator of Record Notification Form.pdf](http://www.epa.state.oh.us/portals/28/documents/opcert/Operator%20of%20Record%20Notification%20Form.pdf).

On July 6, a complaint was received concerning the Riverview Crossing MHP WWTP discharge. The complaint was about odors and a septic discharge from this facility. The complaint was from a local canoe livery located downstream of this facility. Over the July 4 weekend, numerous canoeists complained about the discharge from this park, noting the discharge was from the outfall pipe clearly marked with Riverview's information. A power surge over the July 4 weekend caused the WWTP blowers to trip off. This was not detected until later. The park has experienced numerous power surges in the past several years. Duke Energy has been contacted to try and eliminate the power surges. At the time of the inspection, some solids were noted in the WWTP discharge. The facility must address this recent event and indicate how future events will be prevented.

The ultraviolet disinfection system consists of 4 banks of bulbs with a total of 16 bulbs. The July 4 weekend power surge also damaged two ballasts associated with this disinfection system. These were fixed on July 9. The facility must do a better job of detecting these failures and fixing them on a timelier manner.

The WWTP is enclosed in a building with very poor lighting. As a result, it is very hard to observe the condition of the WWTP. Proper lighting could have allowed a more timely detection of the blowers not operating. Please indicate how additional lighting will be provided for the WWTP.

Over the years, filamentous bacteria have been a problem at the WWTP. This in turn impacts the sludge settling rates. To treat this situation, chlorine is periodically added to

Permit #: 1PV00096*CD
NPDES #: OH0118974

the sludge return. The facility must work to find the source of these bacteria and then eliminate it.

Areas Not Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) indicated numerous NPDES Permit violations. A listing of the violations for March 2009 through May 2010 is indicated on Attachment I. Future violations must be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The WWTP flow rate is monitored using a v-notch weir and an ultrasonic meter. The treatment plant is designed for an average daily flow rate of 120,000 gpd. A review of the DMRs for the noted period indicated that the average and peak flow rates were 42,000 gpd and 98,000 gpd.

The NPDES Permit mistakenly requires fecal coliform be monitored year round. The effluent limits and monitoring should have only been required for the summer. We will work on correcting this mistake. In addition, the next permit will require E. coli be limited. The new permit limits will be 126#/100 ml for the monthly average and 284#/100ml for the weekly average. We would recommend monitor the effluent discharge for this parameter to confirm that the current disinfection system is adequate.

A diesel fuel backup generator is provided for the WWTP. The generator can operate most of the WWTP. The generator will automatically switch on after the power is off for several minutes. The backup generator is run every Friday and is not run under any loads. Two times a year the generator is operated under a load.

Attachment I

Effluent Limit Violations for March 2009 through May 2010

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2009	pH	Daily	S.U.	6.5	6.0
April 2009	pH	Daily	S.U.	6.5	6.0
August 2009	Ammonia	Monthly	mg/l	1.0	1.1
August 2009	pH	Daily	S.U.	6.5	6.3
August 2009	pH	Daily	S.U.	6.5	6.4
August 2009	pH	Daily	S.U.	6.5	6.2
September 2009	pH	Daily	S.U.	6.5	6.3
September 2009	pH	Daily	S.U.	6.5	6.2
September 2009	pH	Daily	S.U.	6.5	6.4
September 2009	pH	Daily	S.U.	6.5	6.2
September 2009	pH	Daily	S.U.	6.5	6.4
September 2009	pH	Daily	S.U.	6.5	6.4
September 2009	pH	Daily	S.U.	6.5	6.4
September 2009	pH	Daily	S.U.	6.5	6.4
September 2009	pH	Daily	S.U.	6.5	6.4

