



**Environmental
Protection Agency**

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



1PV0002120080331

BUTLER

ISLAND LAKE MHP WWTP

SARLE, EDWARD

2008/03/31



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

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

March 28, 2008

Mr. James Geyer
JGR Properties, Incorporated
P.O. Box 354
Oxford, Ohio 45056

Re: Butler County, Island Lake MHP, Compliance Evaluation Inspection

Dear Mr. Geyer:

On March 20, 2008, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0049875; OEPA Permit No. 1PV00021*DD and 1PV00021*ED). Representing this facility was Kathy Overberg, Bob Craig, Troy Wells and Duane Boswell. A copy of my inspection report is enclosed.

The inspection report contains four unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. The Flow Measurement section was rated unsatisfactory as a result of the failure to correctly measure the WWTP discharge flow rate. The Self-Monitoring section was rated unsatisfactory as a result of monitoring violations. The Compliance Schedule section was rated unsatisfactory as a result of the Consent Order violations.

The areas noted in the report summary will require a written response by April 18, 2008. The response should include a description of the actions proposed to address those areas and the dates for completion of the actions.

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

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Gregg Bachmann, AGO
Duane Boswell, WWTP Operator
Kathy Overberg, Park Manager







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
1PV00021*ED	OH0049875	3/20/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Island Lake MHP 2315 Millville Oxford Road Oxford, Ohio 45013	10:30 A.M.	7/1/2007
	Exit Time	Permit Expiration Date
	11:25 A.M.	6/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Kathy Overberg, Park Manager	(513) 602-3782	
Bob Craig, Park Maintenance	(937) 902-5650	
Troy Wells, Park Maintenance	(513) 602-3782	
Duanne Boswell, WWTP Operator	(937) 408-7926	
Name, Address and Title of Responsible Official	Phone Number	
James Geyer, President P.O. Box 610 5500 College Corner Pike Oxford, Ohio 45056	(513) 523-6329	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	U	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	U	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 / Comments.			
Inspector		Reviewer	
<i>Ned Sarle</i>	3/28/08	<i>Martyn Burt</i>	3/28/08
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



Summary of Findings / Comments

Areas Requiring a Response

The Consent Order addressing the Island Lake MHP (Island) became effective on March 5, 2007. The Consent Order required a \$75,000 civil penalty be paid by JGR Properties, Inc. Copies of these checks were required to be provided to the Ohio EPA, Southwest District Office. The Ohio EPA has not received copies of these payments. Please submit this information immediately.

The WWTP was designed for an average daily flow rate of 40,000 gpd and a peak daily flow rate of 200,000 gpd. A review of the Monthly Operating Reports (MORs) for February 2007 through January 2008 indicated that the average daily flow rate was 52,000 gpd and the peak daily design flow rate was 156,000 gpd. The Ohio EPA is concerned that the average daily flow rate exceeded the WWTP design flow rate. The flow data either indicates excessive infiltration and inflow or incorrect flow data.

The flow rate is currently estimated from the elapsed time meter used for the surface sand filter dosing pumps. The NPDES Permit requires that the WWTP discharge flow rate be monitored continuously. The current flow estimate is not acceptable. The Permit to Install approved on February 21, 2006 proposed an ultrasonic flow meter be installed in the chlorine contact tank. This would be an acceptable flow monitor. Island must immediately install either this approved flow meter or another acceptable alternative.

For November 2007, reporting code "AH" was used for all TSS, ammonia, and CBOD5 results. In all, the "AH" code was reported 12 times in this month. The reason for these reporting codes was the failure to pay the lab fees. This is not acceptable. All of these are considered to be monitoring violations. Island must address these monitoring violations by obtaining these sample results and resubmitting the MORs.

Areas Not Requiring a Response

A review of the MORs for February 2007 through January 2008 indicates numerous NPDES Permit violations. These violations are detailed on Attachment I. Island has reported these violations as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification." Future violations must continue to be reported as required by the NPDES Permit.

Over five inches of rain were reported in Butler County for the two days prior to the inspection. The aeration tank color was noted as a dark brown color. With the recent rain, this sludge appears to have been maintained in the WWTP and was not washed out of the WWTP. Some sludge deposits were noted on the surface sand filters.



In the last inspection, a WWTP overflow was noted. Since the last inspection, bypasses have not occurred from the sewage collection system or WWTP. If future bypasses occur, Island must report these events as required by the NPDES Permit as addressed in Part III, Section 11 titled "Unauthorized Discharges."

The odor, color, turbidity, and temperature are monitored in the surface sand filter dosing tank. This is not correct. All parameters must be monitored in the dechlorination tank prior to discharge to the private lake.

The WWTP operator is currently wasting sludge from the clarifier to the existing sludge holding tank and then the two new sludge holding tanks. The supernate from these tanks is discharged back to the aeration tank. Island then has these tanks pumped out by AK Butler.



Attachment I

Island Lake MHP

Effluent Limit Violations for February, 2007 through January 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
February 2007	TSS	Monthly	mg/l	12	22
February 2007	TSS	Weekly	mg/l	18	39
February 2007	TSS	Weekly	mg/l	18	22
February 2007	TSS	Monthly	kg/day	1.81	8.22
February 2007	TSS	Weekly	kg/day	2.72	17.9
February 2007	TSS	Weekly	kg/day	2.72	6.29
March 2007	TSS	Monthly	mg/l	12	62
March 2007	TSS	Weekly	mg/l	18	59
March 2007	TSS	Weekly	mg/l	18	38
March 2007	TSS	Weekly	mg/l	18	168
March 2007	TSS	Weekly	mg/l	18	31
March 2007	TSS	Monthly	kg/day	1.81	7.78
March 2007	TSS	Weekly	kg/day	2.72	21.4
March 2007	TSS	Weekly	kg/day	2.72	4.31
March 2007	TSS	Weekly	kg/day	2.72	9.92
March 2007	CBOD5	Monthly	mg/l	10	15
March 2007	CBOD5	Weekly	mg/l	15	27
March 2007	CBOD5	Weekly	mg/l	15	27
March 2007	CBOD5	Monthly	kg/day	1.51	1.87
March 2007	CBOD5	Weekly	kg/day	2.27	3.70
March 2007	CBOD5	Weekly	kg/day	2.27	3.07
April 2007	TSS	Monthly	mg/l	12	18
April 2007	TSS	Weekly	mg/l	18	28
April 2007	TSS	Weekly	mg/l	18	31
May 2007	TSS	Weekly	mg/l	18	24
May 2007	TSS	Weekly	kg/day	2.72	11.2
May 2007	TSS	Weekly	kg/day	2.72	4.28
May 2007	TSS	Weekly	kg/day	2.72	4.10
May 2007	DO	Daily	mg/l	6.0	2.0
August 2007	Ammonia	Daily	kg/day	0.45	0.47
September 2007	Fecal Coliform	Monthly	#/100ml	1000	1100

