



Environmental
Protection Agency

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



1PV0002120090424

BUTLER

ISLAND LAKE MHP WWTP

SARLE, EDWARD

2009/04/24



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

April 24, 2009

Mr. Ken Budinger
Towne Properties
11857 Kempersprings Drive
Cincinnati, Ohio 45240

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

Dear Mr. Budinger:

On March 25, 2009, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0049875; OEPA Permit No. 1PV00021*ED). Representing this facility was Tim Poynter, Mike Griffin, Mark McCord and you. A copy of my inspection report is enclosed.

The inspection report contains three marginal areas. The Operations & Maintenance section was rated marginal as a result of the noted WWTP deficiencies. The Flow Measurement section was rated marginal 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 areas noted in the report summary will require a written response by May 15, 2009. 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: Bridget C. Coontz, AGO
Tim Poynter, WWTP Operator



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	3/25/2009	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	9:50 A.M.	7/1/2007
	Exit Time	Permit Expiration Date
	10:55 A.M.	6/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ken Budinger, Towne Properties, Association Manager	(513) 874-3737	
Tim Poynter, Pollution Control Systems, Inc.	(513) 831-1165	
Mike Griffin, Towne Properties, Maintenance	(513) 874-3737	
Mark McCord, WWTP Operator	(513) 874-3737	
Name, Address and Title of Responsible Official	Phone Number	
Ken Budinger Towne Properties 11857 Kempersprings Drive Cincinnati, Ohio 45240	(513) 523-6329	

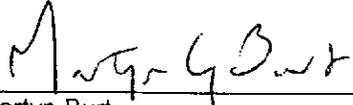
Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedule
M	Operations & Maintenance	S	Effluent/Receiving Waters	M	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
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4/24/09 Date	4/24/09 Date

Summary of Findings / Comments

Areas Requiring a Response

In the past, the WWTP flow rate has been estimated using the surface sand filter dosing pump elapse time meters. The NPDES Permit requires that the WWTP discharge flow rate be monitored continuously. Using elapse time meters has been noted in the past as not being acceptable. An ultrasonic flow meter was installed last year in the chlorine contact tank. This would be an acceptable method. However, Tim Poynter notified the Ohio EPA on April 9, 2009 that this flow meter was not operating correctly. This was due to the fact that the v-notch weir was underwater. This situation was caused by having the dechlorination tank outlet pipe set too high. This outlet pipe is being lowered to allow for the flow meter to operate correctly. Please confirm that this work has been completed and that the flow meter is now operating properly.

During the inspection, a surface sand filter dosing pipe was noted as leaking. This allowed wastewater and sludge to be discharged to the ground next to the surface sand filters. This pipe should be repaired as quickly as possible. Please confirm that this leaking pipe has now been repaired.

Towne Properties has worked hard to improve the WWTP operations. The surface sand filters have been cleaned and the sludge hauled to the Rumpke Landfill in Hamilton County. Some sludge deposits were noted next to the surface sand filters. This material must also be cleaned up and properly disposed. Portions of the WWTP piping have also been repaired. A blower was also noted as being missing. This blower should be replaced as soon as possible. Sludge was also noted as needing to be hauled from the WWTP. Please address the status of these WWTP improvements.

Areas Not Requiring a Response

On January 8, 2009, the Butler County Common Pleas Court placed the Island Lake MHP (Island) into receivership. This was due to a lack of payment to the mortgage company. The new operator of the park was ordered to be Towne Properties. Since taking over this park, it has taken time for Towne Properties to realize that the facility was served by a package plant. As of April 1, 2009, Towne Properties has contracted with Tim Poynter to be the certified operator of this WWTP. Apparently, the old operator continued to service this WWTP through the beginning of March of this year.

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 April 2008 through February 2009 indicated that the average daily flow rate was 20,000 gpd and the peak daily design flow rate was 480,000 gpd.

A review of the MORs for February 2008 through February 2009 indicates two 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. A number of monitoring violations were also noted for this period. These monitoring violations are addressed on Attachment II. Island must ensure the WWTP discharge is monitored and reported in accordance to the NPDES Permit. Finally, numerous "AH" reporting codes were reported in this period. These are noted on Attachment III. The reason provided for these "AH" codes is the failure to pay the lab fees. This reason is not acceptable, and these are also considered to be monitoring violations.

Attachment 1

Island Lake MHP

Effluent Limit Violations for February 2008 through February 2009

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
September 2008	Ammonia	Monthly	mg/l	2.0	4.9
September 2008	Ammonia	Daily	mg/l	3.0	9.2

Attachment II

Effluent Monitoring Violations

February 2008 through February 2009

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
April 2008	Turbidity, Severity	1/Day	1	0	04/02/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/03/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/04/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/05/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/06/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/07/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/09/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/10/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/11/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/12/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/13/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/14/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/15/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/16/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/17/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/18/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/19/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/20/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/21/2008
April 2008	Total Suspended Solids	1/Week	1	0	04/22/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/22/2008
April 2008	CBOD 5 day	1/Week	1	0	04/22/2008
April 2008	pH	1/Week	1	0	04/22/2008
April 2008	Dissolved Oxygen	1/Week	1	0	04/22/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/23/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/24/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/25/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/26/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/27/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/28/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/29/2008
April 2008	Turbidity, Severity	1/Day	1	0	04/30/2008
May 2008	Nitrogen, Ammonia	1/2Weeks	1	0	05/15/2008
May 2008	Total Suspended Solids	1/Week	1	0	05/22/2008
May 2008	CBOD 5 day	1/Week	1	0	05/22/2008
July 2008	Nitrogen, Ammonia	1/2Weeks	1	0	07/15/2008
July 2008	Total Suspended Solids	1/Week	1	0	07/22/2008

Attachment II

Effluent Monitoring Violations

February 2008 through February 2009

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2008	CBOD 5 day	1/Week	1	0	07/22/2008
July 2008	Chlorine	1/Week	1	0	07/22/2008
July 2008	pH	1/Week	1	0	07/22/2008
July 2008	Dissolved Oxygen	1/Week	1	0	07/22/2008
October 2008	Total Suspended Solids	1/Week	1	0	10/22/2008
October 2008	CBOD 5 day	1/Week	1	0	10/22/2008
October 2008	Chlorine	1/Week	1	0	10/22/2008
October 2008	pH	1/Week	1	0	10/22/2008
October 2008	Dissolved Oxygen	1/Week	1	0	10/22/2008

Attachment III

Effluent Monitoring Violations

February 2008 through February 2009

Parameter	Units	Date	A Code
Nitrogen, Ammonia (NH3)	mg/l	8/17/2008	AH
Nitrogen, Ammonia (NH3)	mg/l	1/5/2009	AH
Dissolved Oxygen	mg/l	1/11/2009	AH
pH	S.U.	1/11/2009	AH
Total Suspended Solids	mg/l	1/11/2009	AH
CBOD 5 day	mg/l	1/11/2009	AH
Total Suspended Solids	mg/l	1/15/2009	AH
Nitrogen, Ammonia (NH3)	mg/l	1/15/2009	AH
CBOD 5 day	mg/l	1/15/2009	AH
Total Suspended Solids	mg/l	1/19/2009	AH
CBOD 5 day	mg/l	1/19/2009	AH
Dissolved Oxygen	mg/l	1/25/2009	AH
pH	S.U.	1/25/2009	AH
Total Suspended Solids	mg/l	1/25/2009	AH
Nitrogen, Ammonia (NH3)	mg/l	1/25/2009	AH
CBOD 5 day	mg/l	1/25/2009	AH
Total Suspended Solids	mg/l	1/29/2009	AH
Nitrogen, Ammonia (NH3)	mg/l	1/29/2009	AH
CBOD 5 day	mg/l	1/29/2009	AH



Division of Surface Water
Non-compliance Notification for
Bypasses and Upsets

Use this form to report non-compliance that is the result of any **unanticipated bypass** or **upset** resulting in an exceedance of any **effluent limit** in your NPDES permit (see Part III, Section 12 of your NPDES permit for details). The form should be completed and emailed to the appropriate Ohio EPA inspector, or Ohio EPA office using one of the following addresses:

Southeast District Office: sedo24hournpdes@epa.state.oh.us
 Southwest District Office: swdo24hournpdes@epa.state.oh.us
 Northwest District Office: nwdo24hournpdes@epa.state.oh.us
 Northeast District Office: nedo24hournpdes@epa.state.oh.us
 Central District Office: cdo24hournpdes@epa.state.oh.us
 Central Office: co24hournpdes@epa.state.oh.us

On a case-by-case basis it may be determined an environmental emergency exists. Report environmental emergencies within thirty (30) minutes of discovery to Ohio EPA 24-hours a day, 365 days a year at 800-282-9378!

Permittee Information	
Name of permittee:	Island lake mhp
NPDES Permit number:	
Contact name for permittee:	Tim Poynter
Contact telephone number:	513-831-1165
Date and time of discharge	
Date and time(s) of discharge:	4/5/09 mid afternoon
Date and time discharge discovered:	Same
Description of discharge	
Approximate amount of discharge:	300 gallons
Characteristics of discharge:	Overflowed the digester
Stream(s) affected by discharge	
Provide the name of all streams affected by the discharge:	None
Circumstances that created the discharge	
Describe the circumstances that created the discharge:	I was wasteing sludge to the sludge holding tank. There is a transfer pump that is operated by a float switch to transfer sludge to the new digester. I did not know that the pump ran off of a float switch. So the pump over flowed the digester while I checking another plant. The over flow was a puddle within 20 feet of the digester. The sludge was very thin mostly supernate.
Contact person with knowledge of discharge (if different than above)	
Name:	Tim Poynter
Telephone number:	513-831-1165
Remedial steps	
Describe all remedial steps which are or will be taken to address the discharge:	Now that I know how it works, I will not do that again.
Person responsible for implementing remedial steps	
Name:	Tim Poynter
Telephone number:	513-831-1165

