



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911TELE: (937) 285-6357 FAX: (937) 285-6249  
[www.epa.state.oh.us](http://www.epa.state.oh.us)Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

May 15, 2008

Jim Kittle, Senior Vice President Lending  
United Community Bank  
215 Eads Parkway  
Lawrenceburg, Indiana 47025

Re: Butler County, Town and Country MHP, Compliance Evaluation Inspection

Dear Mr. Kittle:

On May 8, 2008, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0108804; OEPA Permit No. 1PV00079\*CD). Representing Town and Country MHP were Lynda Fox, Reese Belflore, Mike Ullman, Greg Ross and you. A copy of my inspection report is enclosed.

The inspection report contains two unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. The Permit section was rated unsatisfactory as a result of the WWTP bypasses.

As can be seen in the attached inspection report, additional action is required to eliminate the effluent violations and the WWTP bypasses. The inspection was also conducted to discuss the necessary actions to eliminate these violations. In the past, the Ohio EPA recommended that these improvements include at least a new flow equalization tank, additional secondary clarification capacity and/or additional surface sand filters, and new disinfection facilities. During the inspection, Winelco provided information summarizing the WWTP flows. They also provided a preliminary proposal that included a new flow equalization tank, two new surface sand filters and a new disinfection system. The estimated cost of this upgrade was between \$110,000 and \$115,000. The cost for designing this upgrade was also estimated at \$6000.

Proposed Ohio EPA Director's Final Findings and Orders (DFFOs) were sent to the Town and Country MHP on April 18, 2008. The proposed DFFOs addressed the required actions for eliminating the violations at this park. The Town and Country MHP was required to respond to the proposed DFFOs within 14 days. The United Community Bank is requested to notify the Ohio EPA as soon as possible of their intentions of upgrading this WWTP.

Mr. Jim Kittle  
May 15, 2008  
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If you have any questions, please call me at (937) 285-6096.

Sincerely,



Ned Sarle  
Division of Surface Water  
Permits Section

Enclosure

cc: Lynda Fox, LJK Management Inc.  
Mike Ullman, Winelco, Inc.  
Jeff Agnew, Butler County Health Department  
Martha Horvitz, CO, Legal  
Andrew Conway, CO, DSW



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NPDES Compliance Inspection Report

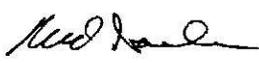
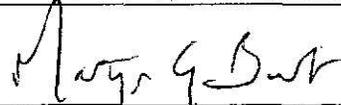
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00079*CD	OH0108804	5/8/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Town and Country MHP 2243 Hamilton - Cleves Road Hamilton, Ohio 45013	9:30 A.M.	5/1/2005
	Exit Time	Permit Expiration Date
	11:00 A.M.	4/30/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jim Kittle, United Community Bank	(812) 537-4822 ext. 211	
Lynda Fox, LJK Management Inc.	(513) 688-0104	
Reese Belfiore, LJK Management Inc.	(513) 688-0104	
Mike Ullman, Wineco, Inc.	(513) 755-8050	
Greg Ross, Wineco, Inc.	(513) 755-8050	
Name, Address and Title of Responsible Official	Phone Number	
Jim Kittle, Senior Vice President Lending United Community Bank 215 Eads Parkway Lawrenceburg, Indiana 47025	(812) 537-4822 ext. 211	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
U	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	U	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
 5/15/08	 5/15/08
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 1PV00079\*CD  
NPDES #: OH0108804

### **Summary of Findings / Comments**

The United Community Bank provided funding to Jeff Maxwell for the purchase of the Town and Country MHP. As of January 1, 2008, the United Community Bank has actively assisted in the operation of the Town and Country MHP. LJJ Management, Inc. (LJK) has been brought in to perform the day to day operations of the park. They have been addressing violations noted by both the health department and the Ohio EPA.

Winelco, Inc. has also been retained for the WWTP operation and maintenance. They have refurbished the WWTP to ensure the treatment system operates as well as possible. LFK has also replaced the sand for one filter and will replace the sand in the other filter as soon as possible.

A review of the Monthly Operating Reports (MORs) for January through March 2008 indicated the NPDES Permit violations are continuing. These violations are listed on Attachment I. The noted violations have been reported 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 permit.

The park has a capacity of 83 mobile homes of which approximately 50% are occupied. The WWTP is designed for an average daily flow of 15,000 gpd. A review of the MORs for April 2007 through March 2008 indicated the average daily flow was 17,000 gpd and the peak daily flow was 198,000 gpd.

The WWTP consists of a trash trap, aeration tank, clarifier, dosing tank also used for the chlorination system, and two surface sand filters. Dechlorination facilities are not provided. A sludge holding tank is also provided for the WWTP.

Excessive infiltration and inflow cause solids to be washed out of the aeration tank and deposited on the surface sand filters. A bypass pipe with a removable screw cap is provided for one surface sand filter. During the inspection, this filter was noted as being flooded. This is also the filter that the sand still needs to be replaced. Whenever high WWTP flows flood the surface sand filter, the screw cap is removed so that the filter is bypassed. Bypassing the surface sand filter is considered an unauthorized discharge and must be reported in accordance to the NPDES Permit. These requirements are detailed in the NPDES Permit in Part III.11 titled "Unauthorized Discharges" and in Part III.12 titled "Noncompliance Notification". The surface sand filters have been reported as being bypassed on at least one occasion in January and two occasions in February. These bypasses are a violation of the NPDES Permit. The Town and Country MHP must take all necessary action to eliminate all future WWTP bypasses. Town and Country MHP must also continue to report all future WWTP bypasses as required by the NPDES Permit.

Permit #: 1PV00079\*CD  
 NPDES #: OH0108804

Attachment I

Effluent Limit Violations for January through March 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
January 2008	Ammonia	Monthly	mg/l	2.5	6.7
January 2008	TSS	Monthly	mg/l	12	29
January 2008	Ammonia	Weekly	mg/l	3.75	13
January 2008	TSS	Weekly	mg/l	18	52
February 2008	CBOD5	Monthly	mg/l	10	31
February 2008	CBOD5	Monthly	kg/day	0.57	2.8
February 2008	CBOD5	Weekly	mg/l	15	60
February 2008	CBOD5	Weekly	kg/day	0.85	5.5
February 2008	Ammonia	Monthly	mg/l	2.5	3.2
February 2008	Ammonia	Monthly	kg/day	0.14	0.16
February 2008	TSS	Monthly	mg/l	12	65
February 2008	TSS	Monthly	kg/day	0.68	5.8
February 2008	TSS	Weekly	mg/l	18	126
February 2008	TSS	Weekly	kg/day	1.0	11
February 2008	Ammonia	Weekly	mg/l	3.75	6.0
February 2008	Ammonia	Weekly	kg/day	0.21	0.29
March 2008	CBOD5	Monthly	kg/day	0.57	0.83
March 2008	TSS	Monthly	mg/l	12	45
March 2008	TSS	Monthly	kg/day	0.68	4.0
March 2008	CBOD5	Weekly	kg/day	0.85	1.1
March 2008	TSS	Weekly	mg/l	18	90
March 2008	TSS	Weekly	kg/day	1.0	7.5

