



**Environmental  
Protection Agency**

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



\*1PV0007920090501\*

BUTLER TOWN & COUNTRY MHP

SARLE, EDWARD 2009/05/01

Sewage



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](http://www.epa.state.oh.us)

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

May 1, 2009

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 April 28, 2009, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0108804; OEPA Permit No. 1PV00079\*CD). Representing the Town and Country MHP were Mike Chase and Greg Ross. A copy of my inspection report is enclosed.

The inspection report contains one unsatisfactory area. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. To address the effluent violations, the WWTP was upgraded last year. This upgrade has mostly been acceptable with the exception of the March 2009 violations. These violations may have been the result of sludge collected in the dosing tank. Effort will be made to periodically remove this sludge.

Finally, the Ohio EPA noted problems with splitting wastewater flows between the four secondary clarifiers. Action must be taken to split the flows as evenly as possible between the four treatment units.

The area noted in the report summary will require a written response by May 22, 2009. The response should include a description of the actions proposed to correct the noted deficiencies and the dates anticipated for completion of these actions.



Mr. Jim Kittle  
May 1, 2009  
Page 2

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

Sincerely,



• Ned Sarle  
Division of Surface Water  
Permits Section

Enclosure

ec: Lynda Fox, LJF Management Inc.  
Andy Griner, Winelco, Inc.  
Martha Horvitz, CO, Legal  
Mark Mann, CO, DSW



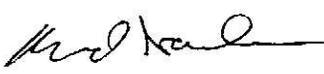
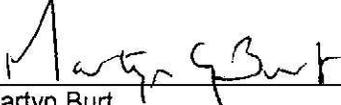
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00079*CD	OH0108804	4/28/2009	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
	10:50 A.M.	4/30/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mike Chase, LJM Management Inc. Greg Ross, Winelco, Inc.	(513) 688-0104 (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)					
S	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
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
5/1/09 Date	5/1/09 Date

## **Summary of Findings / Comments**

### Areas Requiring a Response

On September 17, 2008, the Ohio EPA approved the plans for the WWTP upgrade. This upgrade included two new secondary clarifiers and a new ultraviolet disinfection system. Construction started on November 17, 2008 and was completed on December 31, 2008. Staff indicated that maintaining similar sludge blankets in the four secondary clarifiers has been very difficult. The two old clarifiers are each served by a 6 inch pipe. The approved plans showed these treatment units are being served by a single 6 inch pipe that was split between the two tanks. The two new clarifiers are served by a single 6 inch pipe that is split between the two tanks. Floating sludge was also noted in two new clarifiers. The floating sludge can be an indication of old sludge.

The Ohio EPA is concerned that the wastewater is not being evenly split between the four secondary clarifiers. Please indicate what actions will be taken to evenly split the flow between the four clarifiers.

### Areas Not Requiring a Response

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. LJK Management, Inc. (LJK) has been brought in to perform the day to day operations of the park. Winelco, Inc. has also been retained for the WWTP operation and maintenance.

A review of the Monthly Operating Reports (MORs) for April 2008 through February 2009 indicated numerous NPDES Permit violations. These violations are listed on Attachment I. The March 2009 violations appear to be due to sludge collecting in the dosing tank. To prevent future violations, Town and Country will periodically remove any sludge collected in this tank. 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 58 are currently occupied. The WWTP is designed for an average daily flow of 15,000 gpd and a peak daily flow of 75,000 gpd. A review of the MORs for the noted period indicated the average daily flow was 10,000 gpd and the peak daily flow was 90,000 gpd.

The WWTP consists of two trash traps, an aeration tank, four secondary clarifiers, a dosing tank, two surface sand filters and an ultraviolet disinfection system. A sludge holding tank is also provided for the WWTP. The trash traps are pumped quarterly by Winelco. Sludge from the holding tank is also removed as needed at the same time. Sludge removed from the surface sand filters is hauled to the Rumpke Landfill.

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

The pipes between the aeration tank and four secondary clarifiers have frequently plugged. Staff is now routinely cleaning these pipes. This situation should be addressed as best as possible.

Surface sand filter bypasses have been a problem in the past. Both filters have now been rebuilt. Currently, the dosed wastewater has been draining quickly in both filters. The amount of solids collected on these filters is now greatly reduced. Any future WWTP bypasses must be reported as required by the NPDES Permit as addressed in Part III.11 titled "Unauthorized Discharges".

The NPDES Permit expires on April 30, 2010. The NPDES Permit renewal application will be required to be submitted by November 1, 2009.

Attachment I

Effluent Limit Violations for April 2008 through March 2009

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2008	TSS	Monthly	mg/l	12	63
April 2008	TSS	Monthly	kg/day	0.68	5.0
April 2008	CBOD5	Monthly	kg/day	0.57	0.57
April 2008	TSS	Weekly	mg/l	18	176
April 2008	TSS	Weekly	kg/day	1.0	14
April 2008	CBOD5	Weekly	mg/l	15	17
April 2008	CBOD5	Weekly	kg/day	0.85	1.3
June 2008	Fecal Coliform	Monthly	#/100ml	1000	4200
June 2008	Fecal Coliform	Weekly	#/100ml	2000	4200
June 2008	Chlorine	Daily	mg/l	0.019	0.06
June 2008	Chlorine	Daily	mg/l	0.019	0.1
July 2008	Fecal Coliform	Monthly	#/100ml	1000	5700
July 2008	Chlorine	Daily	mg/l	0.019	0.11
July 2008	Fecal Coliform	Weekly	#/100ml	2000	5700
July 2008	Chlorine	Daily	mg/l	0.019	0.1
July 2008	Chlorine	Daily	mg/l	0.019	0.15
July 2008	DO	Daily	mg/l	6.0	5.1
August 2008	Fecal Coliform	Monthly	#/100ml	1000	42000
August 2008	Fecal Coliform	Weekly	#/100ml	2000	42000
August 2008	Chlorine	Daily	mg/l	0.019	0.2
August 2008	DO	Daily	mg/l	6.0	4.7
September 2008	Chlorine	Daily	mg/l	0.019	0.07
September 2008	Fecal Coliform	Monthly	#/100ml	1000	"AK"
September 2008	Fecal Coliform	Weekly	#/100ml	2000	"AK"
October 2008	Fecal Coliform	Monthly	#/100ml	1000	7200
October 2008	Fecal Coliform	Weekly	#/100ml	2000	7200
March 2009	TSS	Monthly	mg/l	12	35
March 2009	TSS	Weekly	mg/l	18	68
March 2009	TSS	Monthly	kg/day	0.68	1.5
March 2009	TSS	Weekly	kg/day	1.0	3.1