



**Environmental
Protection Agency**

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



1PV0007920091109

BUTLER

TOWN & COUNTRY MHP

SARLE, EDWARD

2009/11/09



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

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

November 9, 2009

Mr. 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 November 3, 2009, a Compliance Evaluation Inspection and a prepermit inspection were conducted at this facility (NPDES Permit No. OH0108804; OEPA Permit No. 1PV00079*CD). Representing this facility was Greg Ross. A copy of my inspection report is enclosed.

Numerous effluent violations and WWTP bypasses were reported in the past. High flows and treatment unit deficiencies have been the major source of these violations. To address these violations, a WWTP upgrade was completed in December 2008. The MHP is currently not fully occupied. Other than the violations reported in March 2009, the effluent violations and WWTP bypasses have largely been eliminated. Based on the current information, adequate action appears to have been taken to address the past effluent violations and WWTP bypasses. However, as the park becomes more fully occupied and significant rain events occur, additional action to address these past violations may be required.

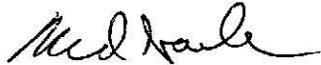
All areas reviewed were found to be acceptable. Therefore, no response is required at this time.



Mr. Jim Kittle
November 9, 2009
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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

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



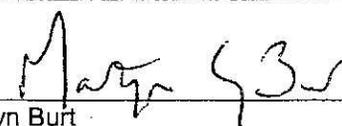
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00079*CD	OH0108804	11/3/2009	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	12:45 P.M.	5/1/2005
	Exit Time	Permit Expiration Date
	1:40 P.M.	4/30/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Ross, Winelco, 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	(513) 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	N	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	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
	
11/9/09 Date	11/9/09 Date
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*
 NPDES #: OH0108804

Pretreatment

Average Daily Design Flow:	15,000 Gallons/Day
Plant Serves:	Mobile Home Park
Average Daily Flow: (Period of Review):	12,200 Gallons/Day (April through September 2009)
Method of flow monitoring:	surface sand filter dosing pumps
Type of alarms for plant:	High water alarm

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **No**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

Trash trap is pumped three times a year.

**Secondary Treatment
(Aeration)**

Color of sludge: **Medium Brown**
 Quality of Sludge: **Medium**
 Foam: **None present**
 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Good**

Comments/Status:

Blower timer is set for 45 minutes on and 15 minutes off.

**Secondary Treatment
(Settling)**

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

Permit #: 1PV00079
NPDES #: OH0108804

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

Comments/Status:

Tertiary Treatment

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

Overall maintenance of components is: **Good**

Comments/Status:

Sludge Handling/Storage Disposal

Hauler name: **Winelco**
Disposal Site: **MSD Mill Creek & LeSourdsville WWTP**
Sludge wasted from: **Sludge Holding Tank**
How often is sludge wasted: **As needed**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Excellent**

Comments/Status:

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **unnamed tributary of Great Miami River**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Permit #: 1PV00079*
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. LJF Management, Inc. 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 through September 2009 indicated one NPDES Permit violation. This violation is addressed on Attachment I. The noted violation has 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 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 12,200 gpd and the peak daily flow was 33,000 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. Sludge removed from the surface sand filters is hauled to the Rumpke Landfill.

Construction of two new secondary clarifiers and an ultraviolet disinfection system was completed on December 31, 2008. The last inspection noted that flows were not evenly divided between the four secondary clarifiers. In August 2009, Winelco modified the WWTP operations to provide for a better flow division between these clarifiers. The WWTP now appears to be providing a better flow division between these clarifiers.

The sewer pipes between the aeration tank and four secondary clarifiers have frequently plugged. WWTP staff is now routinely cleaning these sewer pipes.

Surface sand filter bypasses have been reported in the past. No bypasses have occurred since the last inspection. All future WWTP bypasses must continue to be reported as required by the NPDES Permit as addressed in Part III.11 titled "Unauthorized Discharges".

Permit #: 1PV00079
NPDES #: OH0108804

Attachment II					
Town and Country MHP					
Effluent Limit Violations for April through September 2009					
Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value

August 2009	DO	Daily	mg/l	6.0	3.8
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