



**Environmental  
Protection Agency**

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



\*1PV0008520070625\*

CLERMONT CHESTNUT MHP

JACKSON, JOSHUA 2007/06/25



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2911

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June 25, 2007

Chestnut Lane Mobile Home Park  
Attn: Mr. Ed Bechtol  
715 Cincinnati-Batavia Pike  
Cincinnati, OH 45245

**RE: Notice of Violation  
Chestnut Lane MHP WWTW / Reconnaissance Inspection Report  
NPDES Permit No. OH0105473 / OEPA PERMIT NO. 1PV00085\*BD**

Dear Mr. Bechtol:

On June 20, 2007, I conducted an NPDES Reconnaissance Inspection at the Chestnut Lane Mobile Home Park wastewater treatment works (WWTW). The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's NPDES permit.

Even though not all categories were evaluated during the course of the inspection, those that were received "Satisfactory" marks, with the exception of the following: The "Compliance Schedule" and "Self-Monitoring Program" sections received "Unsatisfactory" ratings due to reasons explained in the report.

**Please pay special attention to all items marked in bold, for they require a corrective action.** If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at [joshua.jackson@epa.state.oh.us](mailto:joshua.jackson@epa.state.oh.us).

Respectfully,

**Joshua Jackson**  
Environmental Specialist II  
Division of Surface Water

Enclosures

Cc: Bob Reckers, Winelco  
Andy Griner, Winelco  
Clermont County Health Dept.



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

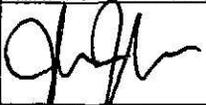
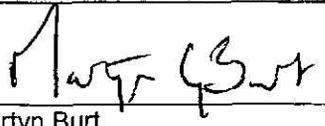
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00085*BD	OH0105473	6/20/2007	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Chestnut Lane Mobile Home Park 2817 Chestnut Lane New Richmond, OH Clermont County	9:20 a.m.	4/1/2002
	Exit Time	Permit Expiration Date
	10:00 a.m.	3/31/2007
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bob Reckers, Winelco (contract operator) Jim Hurst, daily on-site rep.	513-755-8050 513-617-7974 (cell phone)	
Name, Address and Title of Responsible Official	Phone Number	
Ed Bechtol, Owner 715 Cincinnati-Batavia Pike Cincinnati, OH 45245	513-374-8899 (cell phone) 513-528-2121 Office	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Compliance Schedule
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Studge Storage/Disposal	<input checked="" type="checkbox"/> Collection System
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Studge Storage/Disposal	<input checked="" type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Compliance Schedule
<input checked="" type="checkbox"/> Collection System	<input checked="" type="checkbox"/> Studge Storage/Disposal	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Other

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached report.

Inspector	Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 6-22-07	Date 6/25/07

### Inspection Findings (Items for Correction in Bold Lettering)

The Chestnut Lane Mobile Home Park (MHP) wastewater treatment works (WWTW) is designed to treat an average daily flow of 3,900 gallons/day. It is made up of the following components:

- (2) 5,000-gallon single-compartment septic tanks
- (1) 4,000-gallons recirculation tank with two-100 gpm dosing pumps
- (2) sand filters (1024 sq.ft. each)
- (1) chlorine contact tank

The NPDES permit for the Chestnut Lane MHP requires daily discharge flow readings. A review of the self-monitoring reports for August 2006 – May 2007 (no data was submitted from January 2006 – July 2007) shows that no discharge flow data was reported. For this reason, a rating of "Unsatisfactory" was given for the "Self-Monitoring" section of this report.

**For a WWTW of this size, flow monitoring may be performed by reasonably accurate estimation. Flows can be estimated by the use of a weir or flume, bucket-and-stopwatch measurements, integrating timers on dosing pumps or water meter readings. Flow monitoring and reporting of the Chestnut Lane MHP WWTW must begin immediately.**

**The current NPDES permit was issued to the previous owner. Mr. Bechtol shall complete an "Application to transfer Ohio NPDES permit" form (attached) and submit it to the Ohio EPA Southwest District Office no later than July 2, 2007.**

The following is a list of effluent limit violations reported to the Ohio EPA:

#### EFFLUENT LIMIT VIOLATIONS (Period of Review: August 2006 – May 2007)

7D = Weekly      30D = Monthly      1D = Daily  
Conc. = Concentration (mg/l)      Qty. = Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
August 2006	Chlorine, Total Residual	1D Conc	0.019	.06
August 2006	Chlorine, Total Residual	1D Conc	0.019	.56
September 2006	Chlorine, Total Residual	1D Conc	0.019	2.58
October 2006	Chlorine, Total Residual	1D Conc	0.019	.05
December 2006	Dissolved Oxygen	1D Conc	5.0	4.
February 2007	Nitrogen, Ammonia (NH3)	30D Conc	2.0	5.4
February 2007	Nitrogen, Ammonia (NH3)	7D Conc	3.0	5.4

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March 2007	Dissolved Oxygen	1D Conc	5.0	4.5
March 2007	Dissolved Oxygen	1D Conc	5.0	2.5
April 2007	Dissolved Oxygen	1D Conc	5.0	3.3
April 2007	Dissolved Oxygen	1D Conc	5.0	3.

Historically, this facility has difficulty achieving compliance with the NPDES permit limit for dissolved oxygen. Typically, the reason is ponded water on the recirculating sand filters due to lack of maintenance (build-up of solids and packing of the sand). If this facility continues to show non-compliance, Ohio EPA will require the installation of a post-aeration unit.

The current NPDES permit contains a schedule to install a treatment unit that would achieve compliance with the chlorine residual limit of 0.019 mg/l. Typically, this would be the installation of either a dechlorination unit or ultraviolet disinfection system. This work was never completed. For this reason, a rating of "Unsatisfactory" was given for the "Compliance Schedule" section of this report.

**Ownership of Chestnut Lane MHP must submit approvable detailed plans to the Ohio EPA Southwest District Office by no later than July 31, 2007, for the installation of either a dechlorination unit or a UV disinfection system to serve the WWTW. Once the detailed plans are approved, the approved treatment system must be installed by no later than September 15, 2007. Failure to meet this compliance schedule will result in this office recommending an enforcement action on the Chestnut Lane MHP ownership.**

#### Items Observed During the Inspection

1. The recirculating sand filters appeared to be well maintained. The sand beds were free from solids build-up and weeds. Mr. Hurst stated that more sand will be brought in to level the beds.
2. Spent sand (that had been raked off the beds) was piled on the sides of the filters. **This sand should be kept in a dumpster instead of stockpiled on the WWTW grounds.**
3. The recirculation pumps were working at the time of the inspection.
4. Winelco (contract operator) is pilot testing a smaller UV disinfection system at the Chestnut Lane MHP WWTW. This pilot testing period will only be conducted for a few weeks.
5. At the time of the inspection, Mr. Hurst provided a receipt showing that 4-1500 gallons loads of septage had been removed from the septic tanks (hauled by Hess Septic) on May 9, 2007.
6. The discharge from the WWTW to the drainage swale appeared to be clear and free of solids.

