



**Environmental  
Protection Agency**

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



\*1PV0002720080617\*

CLERMONT HILLTOP ENTERPRISES HILLTOP ESTATES MHP ZIMMERMAN, MICH 2008/06/17



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

June 18, 2008

Hilltop Estates Mobile Home Park  
Attn: Marilyn Schnicke and Bob Crable  
P.O. Box 43  
Loveland, Ohio 45140

**Re: Hilltop Estates Mobile Home Park WWTP  
NPDES Permit No. 1PV00027\*GD; OH0049204  
NPDES Compliance Inspection**

Dear Ms. Schnicke:

On May 7, 2008, I conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection at the above referenced facility. Dan George, property manager, accompanied me during the inspection. The purpose of the inspection was to evaluate the operation and performance of the wastewater treatment system and to determine compliance with the NPDES permit.

As indicated on the attached NPDES Compliance Inspection Report, all areas evaluated as part of the inspection received a satisfactory rating with the exception of the following sections: Operations & Maintenance and Self-Monitoring Program. Several conditions resulted in a marginal rating for Operations and Maintenance including: 1) no aeration in the equalization basin; 2) algae partially clogging the clarifier effluent weirs and channels; 3) attached algae and solids on clarifier walls (needing scraped); 4) duckweed growing around the edges of the clarifiers; and 5) need for cleaning of the slow sand filters. Self-Monitoring Program was rated marginal primarily because of violations of monitoring requirements (measurement frequencies) at sampling stations 001 and 588. Refer to the report for additional details.

In reviewing the monthly electronic Discharge Monitoring Reports submitted by the contract operator, Winelco Inc., from July, 2007 to April, 2008, two final effluent numeric limitation violations were noted for pH and TSS. These issues have been discussed in follow-up telephone conversations with Bob Reckers with Winelco. He indicated some of the deficiencies have already been addressed. Please provide a written response summarizing these actions and any additional actions being taken to correct these issues.

Hilltop Estates Mobile Home Park  
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If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael W. Zimmerman".

Michael W. Zimmerman  
Permits Group  
Division of Surface Water

Copy: Dan George, Hilltop Estates MHP  
Bob Reckers, Winelco Inc.



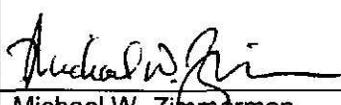
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00027*GD	OH0049204	05/07/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Hilltop Estates Mobile Home Park 2755 State Route 132 New Richmond, Ohio 45157 Mailing: P.O. 43 Loveland, Ohio 45140	11:45 am	4/1/2002
	Exit Time	Permit Expiration Date
	1:05 pm	3/31/2007
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Dan George, Property Manager Ralph Bowling, Maintenance Worker (not present)	(513) 600-7514	
Name, Address and Title of Responsible Official	Phone Number	
Bob Crable and Marilyn Schnicke, Owners	(513) 673-8053	

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	N	Compliance Schedule
M	Operations & Maintenance	S	Effluent/Receiving Waters	M	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
Refer to attached report.			
Inspector		Reviewer	
 Michael W. Zimmerman Division of Surface Water Southwest District Office		Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	
Date		Date	

Permit #: 1PV00027\*GD  
NPDES #: OH0049204

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters..... N
- (c) Product(s) and production rates conform with permit application (Industries)..... N/A
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

**Comments/Status:**

*(b) final effluent discharges to an unnamed tributary (approx. 0.4 river miles) prior to entering Fagin Run*

**Section E: Permit Verification**

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

**Comments/Status:**

*(a) two numeric final effluent (Outfall 001) violations since July, 2007:  
-10/15/2007- pH reported - 6.4 s.u.; limit 6.5 s.u.  
-4/15/2008 - TSS reported - 19 mg/l (7 day); limit 18 mg/l (7 day)  
-frequency violations for Outfall 588 (sludge) for July, 2007, and Feb., Mar., and April, 2008; frequency violations at 001 for temperature, color, odor, and turbidity in July, Aug., 2007, and April, 2008.*

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available....generator  or dual feed ..... N
- (b) Adequate alarm system available for power or equipment failures.. N
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... Y  
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site..... N
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... N
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A  
 On MORs  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

**Record Keeping:**

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)  

*File with maintenance sheets kept in the park office.*
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
  - I. Identification of treatment works..... Y
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
  - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N
  - IV. Laboratory results (unless documented on bench sheets)... N
  - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N

**Section G: Operation & Maintenance (con't)**

**Collection System:**

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power  
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),  
or were there any major repairs to collection system since  
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... N

**Comments/Status:**

- no standby power and no phone lines down to WWTP
- EQ basin aeration blower not working
- both aeration basins on-line
- duck weed growing around the edges of the clarifiers
- clarifier sludge return lines and skimmers working fine
- weir channels and troughs need maintenance (scraped/cleaned)
- fixed media in filters needs maintenance and cleaning
- one of the three slow sand filters in service; top layer of sand needs cleaned or replaced
- water is pumped from dosing tank to sand filters
- distribution pipe leaking at elbow
- UV disinfection system installed in old chlorine contact tank
- there are no lift stations in the collection system

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date:                      Approval #:                      Not submitted     N/A
- (b) Sludge management plan current..... N  
(c) Sludge adequately disposed..... Y  
(Method: *hailed to another POTW*)  
(d) If sludge is incinerated, where is ash disposed of  
(e) Is sludge disposal contracted..... Y  
(Name: *Winelco, Inc.*)  
(f) Has amount of sludge generated changed significantly since  
last inspection..... N  
(g) Adequate sludge storage provided at plant..... Y  
(h) Land application sites monitored and inspected per SMP..... N/A  
(i) Records kept in accordance with State and Federal law..... Y  
(j) Any complaints received in last year regarding sludge..... N  
(k) Is sludge adequately processed (digestion, pathogen control)..... Y

**Comments/Status:**

*Liquid sludge is pumped from the WWTP and hauled to the Clermont County Middle East Fork WWTP approx. 3 times a year (10,000 gallons per load). Sludge was removed from plant in late May, 2008. Winelco also pumps the trash trap, generally once a month as needed.*

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary flow measuring device operated and maintained..... Y  
Type of device: Ultrasonic & Parshall flume  Ultrasonic & Weir  Weir   
Calculated from influent  Other  (Specify: *water level in tank measured using a battery powered Leopold Stevens flow meter.*)  
(b) Calibration frequency adequate ..... Y  
(Date of last calibration: *February, 2008*)  
(c) Secondary instruments operated and maintained..... Y  
(d) Flow measurement equipment adequate to handle full range  
of flows..... Y  
(e) Actual flow discharged is measured..... Y  
(f) Flow measuring equipment inspection frequency  
 Daily  Weekly  monthly  other

**Comments/Status:**

*-flow meter usually calibrated twice a year*

**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
  - (i) Samples refrigerated during compositing..... Y
  - (ii) Proper preservation techniques used..... Y
  - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

**Laboratory:**

*General*

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: *all*

Lab name: *Winelco, Inc.*

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... N
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory  
Date: ??

**Comments/Status:**

- *Winelco participates in the annual DMR-QA studies*

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	Clear	None	None	None	---

**Comments/Status:**

- final effluent discharges from an 8-inch green PVC pipe to an unnamed trib. of Fagin Run; the unnamed trib. is essentially a hillside drainage ditch; the pipe surfaced directly from the ground; no headwall is present

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**

Permit #: 1PV00027\*GD  
 NPDES #: OH0049204

**South Charleston WWTP Numeric Limitation Violations – Outfall 001  
 Review Period – January, 2006 through March, 2008**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	pH	1D Conc	6.5	6.4	3/30/2007
August 2006	Nitrogen, Ammonia (NH3)	30D Qty	1.8	2.25633	8/1/2006
February 2008	Total Suspended Solids	30D Qty	27.3	30.6561	2/1/2008
February 2008	Total Suspended Solids	7D Qty	40.9	122.624	2/1/2008
February 2008	CBOD 5 day	7D Qty	20.4	23.4757	2/1/2008
March 2008	Total Suspended Solids	30D Qty	27.3	48.5317	3/1/2008
March 2008	Total Suspended Solids	7D Qty	40.9	149.594	3/15/2008
March 2008	CBOD 5 day	30D Qty	13.6	18.6003	3/1/2008
March 2008	CBOD 5 day	7D Qty	20.4	25.1250	3/1/2008
March 2008	CBOD 5 day	7D Qty	20.4	37.0002	3/15/2008
October 2007	Nitrogen, Ammonia (NH3)	30D Conc	2	2.13	10/1/2007
October 2007	Nitrogen, Ammonia (NH3)	30D Qty	1.8	2.01002	10/1/2007

(1D Conc = daily limit; 7D Qty = 7 day loading limit; 30D Conc = 30 day (monthly) concentration limit; 30D Qty = 30 day (monthly) loading limit)