



**Environmental  
Protection Agency**

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



\*1PV0000220100817\*

CLERMONT HOLLY TOWNE MHP

WARE, RONALD

2010/08/17



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

August 17, 2010

Morris Investment Company  
Attn: James Sachs  
7710 Shawnee Run Road  
Cincinnati, Ohio 45243

**Re: Holley Towne MHP, 2061 State Route 125, Clermont County  
Reconnaissance Inspection**

Dear Mr. Sachs:

On August 11, 2010, I conducted a Reconnaissance Inspection of the wastewater treatment plant that serves the above referenced facility in Monroe Township, Clermont County (NPDES Permit No. 1PV00002, OH0047961). Judy Wells was present during the inspection. The purpose of this inspection was to evaluate plant operation and performance. A copy of the inspection report is enclosed.

All components of the treatment plant were operational, and the effluent appeared to be clear and free of solids. No response or corrective action is required at this time.

The NPDES permit for this facility (1PV00002\*FD) is set to expire on August 31, 2010. The renewal permit (1PV00002\*GD) will have the following changes:

Effluent Disinfection Standard

Due to recent changes in the State of Ohio's Water Quality Standards, the disinfection standard in NPDES permits has been changed from fecal coliform to E. coli. For your treatment plant, the applicable E. coli standards will be 161 counts/100 ml (monthly geometric mean) and 362 counts/100/ ml (weekly geometric mean). If you are unsure of your treatment plant's ability to meet these new disinfection standards, please inform this office during the 30 day public notice period for this renewal permit.

Sign at the Treatment Plant Outfall

The renewal NPDES permit for this wastewater treatment plant will require that a permanent marker be posted on the bank to the receiving stream (Back Run) at each outfall that is regulated under the NPDES permit.

Operator of Record Requirements

The renewal NPDES permit for this wastewater treatment plant will require that a Class I certified wastewater operator to be the "Operator of Record" for this treatment plant. This new NPDES permit will also require that the operator of record be physically present at the treatment works in accordance with the minimum staffing requirements included in paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code. For Class I facilities, the minimum staffing requirements are 3 days a week for a minimum of 1.5 hours.

In addition, Ohio Administrative Code 3745-7-09 requires that the owner and the operator of record of a wastewater treatment works maintain operation and maintenance records for the treatment works within the treatment works site. These records are to be housed and maintained in such a manner as to be protected from weather damage and to guarantee the authenticity and accuracy of the records (as required by Ohio Administrative Code 3745-7-09).

Arrangements need to be made to ensure that these minimum staffing requirements are being met for this treatment plant. A record keeping log book that meets the authenticity criteria referenced in Ohio Administrative Code 3745-7-09 also needs to be provided for this treatment plant. Please notify the Ohio EPA Southwest District Office no later than September 15, 2010 as to how and when these requirements will be met.

If you have any questions regarding the Operator Certification Rule (Ohio Administrative Code 3745-7) or operator training opportunities, please contact Andy Barienbrock in our Columbus office at (614) 728 - 1216.

Morris Investment Company  
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If you have any questions regarding this letter or the attached report, please contact me at (937) 285 - 6098.

Sincerely,

*Ron Ware*

Ron Ware  
Ohio EPA - Division of Surface Water  
Southwest District Office

cc: Bob Reckers, Winelco, Inc.  
Clermont County General Health District

RW/ca



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report  
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00002*FD	OH0047961	08/11/2010	R	S	Z

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Holly Towne Mobile Home Park 2061 State Route 125 Clermont County, Monroe Township	01:30 AM	September 1, 2005
	Exit Time	Permit Expiration Date
	01:50 AM	August 31, 2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Judy Wells, park manager	(513) 797 - 5024	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Name, Address and Title of Responsible Official	Phone Number	
James Sachs Morris Investment Company 7710 Shawnee Run Road Cincinnati, Ohio 45243	(513) 271 - 7600	

Ohio EPA Inspector	Ohio EPA Reviewer
<i>Ron Ware</i> 8/17/2010 Ron Ware      Date Division of Surface Water Southwest District Office	

Average Daily Design Flow:	<b>35,000 Gallons/Day</b>
Plant Serves:	140 lots
Average Daily Flow: (Period of Review):	<b>39,000 Gallons/Day (January 2010 thru June 2010)</b>
Method of flow monitoring:	Elapsed time meters on sand filter dosing pumps
Type of alarms for plant:	<b>None</b>

**Pretreatment**

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

**Comments/Status:**

**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 type="checkbox"/>	<input checked="" type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is: **Good**

**Comments/Status:**

**Secondary Treatment  
(Settling)**

Clarity: **Solids Present**  
 Condition of Weir: **Algae/solids build up**  
 Weir is level: **Yes**  
 Effluent in weir: **Clear**  
 Clarifier walls need to be scraped: **Yes**

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

**Comments/Status:**

**Tertiary Treatment**

	Yes	No		Yes	No
Surface sand Filters: <b>Slow</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Subsurface</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
Sand filters overgrown	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Fair**

**Comments/Status:**

**Sludge Handling/Storage Disposal**

Hauler name: **Winelco**  
 Sludge wasted from: Return activated sludge line  
 Sludge drying beds: **No**                      Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

**Comments/Status:**

**Plant Discharge**

Discharge point is a: **Stream**  
 Name of discharge point: **Back Run**  
 Discharge is visible: **Yes**                      Quality of Effluent: **Clear**

**Comments/Status:**  
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**EFFLUENT LIMIT VIOLATIONS**  
 (Period of Review: January 2008 – June 2010)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
April 2008	Total Suspended Solids	30 day avg. concentration	12 mg/l	13.8 mg/l
April 2008	Total Suspended Solids	30 day quantity	1.6 kg/day	1.7 kg/day
April 2008	Total Suspended Solids	7 day avg. concentration	18 mg/l	35 mg/l
April 2008	Total Suspended Solids	7 day avg. quantity	2.4 kg/day	4.0 kg/day
April 2008	Total Suspended Solids	7 day avg. quantity	2.4 kg/day	2.6 kg/day
May 2008	Dissolved Oxygen	1 day min. concentration	5.0 mg/l	3.6 mg/l
May 2008	Fecal Coliform	30 day geometric mean	1000	17200
May 2008	Fecal Coliform	7 day geometric mean	2000	17200
May 2008	Total Suspended Solids	7 day avg. quantity	2.4 kg/day	3.2 kg/day
June 2008	Dissolved Oxygen	1 day min. concentration	6.0 mg/l	3.6 mg/l
June 2008	Dissolved Oxygen	1 day min. concentration	6.0 mg/l	3.6 mg/l
June 2008	Dissolved Oxygen	1 day min. concentration	6.0 mg/l	3.6 mg/l
June 2008	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day avg. concentration	1.5 mg/l	2.1 mg/l
June 2008	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day quantity	0.20 kg/day	0.26 kg/day
June 2008	Nitrogen, Ammonia (NH <sub>3</sub> )	7 day avg. quantity	0.33 kg/day	0.35 kg/day
April 2009	Total Suspended Solids	30 day avg. concentration	12 mg/l	16.5 mg/l
April 2009	Total Suspended Solids	30 day quantity	1.6 kg/day	2.2 kg/day
April 2009	Total Suspended Solids	7 day avg. concentration	18 mg/l	22 mg/l
April 2009	Total Suspended Solids	7 day avg. concentration	18 mg/l	30 mg/l
April 2009	Total Suspended Solids	7 day avg. quantity	2.4 kg/day	3.0 kg/day
April 2009	Total Suspended Solids	7 day avg. quantity	2.4 kg/day	3.6 kg/day
May 2009	Chlorine, Total Residual	1 day max. concentration	0.019 mg/l	.05 mg/l
May 2009	Chlorine, Total Residual	1 day max. concentration	0.019 mg/l	.05 mg/l

Permit # 1PV00002\*FD  
NPDES# OH0047961

Reporting Period	Parameter	Limit Type	Limit	Reported Value
March 2010	pH	1 day min. concentration	6.5 S.U.	6.1 S.U.
May 2010	Chlorine, Total Residual	1 day max. concentration	0.019 mg/l	.05 mg/l
May 2010	Chlorine, Total Residual	1 day max. concentration	0.019 mg/l	.05 mg/l

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.