



State of Ohio Environmental Protection Agency

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MIAMI

JGR PROPERTIES INC SUNSHINE MHP

REYNOLDS, JOSEP 2009/03/20

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



State of Ohio Environmental Protection Agency

Southwest District Office

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

March 20, 2009

Mr. James Geyer
JGR Properties, Inc.
5500 College Corner Pike
P.O. Box 610
Oxford, Ohio 45056 – 0610

**RE: Sunshine MHP Notice of Violation / Reconnaissance Inspection, NPDES
Permit No. 1PV00019*CD/OH0049832, Miami County**

Dear Mr. Geyer:

On March 17, 2009 Joe Reynolds and Joe Miller inspected the waste water treatment plants at Sunshine MHP, 6205 US 40, Bethel Township, Miami County. The inspection was conducted as part of the on-going compliance review for the park.

In accordance with the March 5, 2007 consent agreement upgrades to the waste water treatment plant were required to be completed by July 15, 2008. As of the date of this inspection the upgrade has not been completed. This is in violation of the March 5, 2007 consent agreement.

Additionally a review of the Discharge Monitoring Reports (DMR's) from September, 2006 through January, 2009 has revealed no submittals (except for the month of May, 2008) for the entire period. This is in violation of your National Pollutant Discharge Elimination System permit and the March 5, 2007 consent agreement.

The inspection report is attached for your review. If you have any questions regarding the report, I can be contacted at (937) 285 - 6097.

Sincerely,

Martyn Burt
Compliance Supervisor
Division of Surface Water

cc: Miami County Health Department
Bridget Carty, Ohio Attorney General's Office



State of Ohio Environmental Protection Agency
Southwest District Office

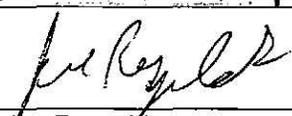
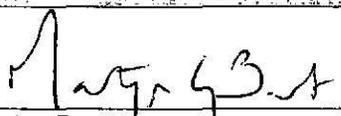
NPDES Compliance Inspection Report

| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 1PV00019*CD | OH0049832 | 3/17/2009 | R | S | 1 |

| Section B: Facility Data | | |
|--|-------------------|-------------------------------|
| Name and Location of Facility Inspected Sunshine Mobile Home Park 6205 East State Route 40 Tipp City, Ohio | Entry Time | Permit Effective Date |
| | 2:15 PM | 5/1/2007 |
| | Exit Time | Permit Expiration Date |
| | 3:15 PM | 4/30/2012 |
| Name(s) and Title(s) of On-Site Representatives | | Phone Number(s) |
| Park maintenance personnel | | |
| Name, Address and Title of Responsible Official | | Phone Number |
| Mr James Geyer (Owner) 5500 College Corner Pike P.O.Box 610 Oxford, Ohio 45056- 0610 | | (513) 523 - 6329 |

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

| Section D: Summary of Findings (Attach additional sheets if necessary) |
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| See attached report. |

| Inspector | Reviewer |
|--|--|
|  Date: 3/20/09 |  Date: 3/20/09 |
| Joe Reynolds Division of Surface Water Southwest District Office | Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office |



Inspection Findings

On Tuesday March 17, 2009 an inspection of the Sunshine Mobile Home Park waste water treatment system was performed. There are two aeration system at the park, an east system and a west system. Both systems discharge to a combined tertiary treatment / disinfection system.

The east aeration system was being aerated at the time of the inspection. Fairly uniform mixing (rolling from side to side) was occurring. Minor white foam was noted on surface. The mixed liquor appeared thin (light brown color). The old sand filter dosing tank is being used as a lift station to pump aeration system effluent to the new tertiary system located next to the west system. A new electrical box with visual alarm has been installed on the lift station. The existing chlorine tank is being converted to a sludge holding tank. The plumbing and pumps still need to be completed on this part of the upgrade. The old tertiary sand filters need to be demolished. The north section of fence will need to be secured after the filter demolition is completed.

The west aeration system was aerating at the time of the inspection. The tank was being mixed uniformly. Minor white foam was noted on the surface. The mixed liquor appeared thin (light brown color). Solids were beginning to build up on the clarifier hopper walls. The surface behind the clarifier inlet baffle was filled with solids. Solids also had built up on the wall side of the outlet weir. These solids were blocking water from entering the effluent weir on this side. The weir trough had solids, algae and rocks in it. The distribution arms were attached to tertiary sand filters. Two of four filters are used at a time. All four filters were drained. Dried solids were noted on the surface of the fourth filter (furthest from the disinfection system). The chlorination / dechlorination / post aeration system is complete. At this time of year the system is operated as a flow through system (no chlorine / sulfate tablets, disinfection season runs May through October). A run time totalizer was being installed on the tertiary system dosing pumps. Pump run times will be used to estimate system flows.

In order to complete the treatment system upgrade the flow totalizer installation needs to be completed. The sludge wasting system must be completed on the east plant, and a security fence, designed to limit access to both plants will need to be installed. The old slow surface sand filters will need to be removed from the East plant. Final site grading / seeding will need to be completed when weather conditions allow.

Inspection Findings (cont.)

From September, 2006 through January, 2009 Sunshine Mobile Home Park did not submit monthly operating report data (except for May, 2008) as required by the NPDES permit. A review of this data revealed 33 frequency violations. These violations include the following at outfall 001: nitrogen ammonia (2), fecal coliform (1), CBOD5 (2), chlorine residual (26), and suspended solids (2).