



State of Ohio Environmental Protection Agency

Southwest District Office

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

March 24, 2008

Mr. James Geyer, Owner
JGR Properties, Inc.
P.O. Box 354
Oxford, Ohio 45056

Re: Butler County, Millville MHP, Compliance Evaluation Inspection

Dear Mr. Geyer:

On March 20, 2008, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit # OH0133736; OEPA Permit # 1PV00124*AD). The inspection was also conducted as part of the NPDES Permit renewal. Duane Boswell was representing this facility. A copy of my inspection report is enclosed.

The inspection report contained two unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the numerous effluent violations. The Compliance Schedule section was rated unsatisfactory as a result of the failure to upgrade the WWTP as required by the NPDES Permit.

The areas noted in the report summary will require a written response by April 11, 2008. The response should include a description of the actions that will be proposed to eliminate these problems and the dates for completion of each action.

If you have any questions, please feel free to call me at (937) 285 - 6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Duane Boswell, WWTP Operator



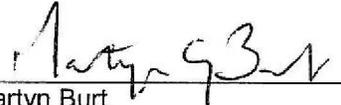
State of Ohio Environmental Protection Agency
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NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00124*AD	OH0133736	3/20/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Millville MHP 2840 Ross Hanover Road Millville, Ohio	9:55 A.M.	5/1/2003
	Exit Time	Permit Expiration Date
	10:15 A.M.	4/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Duane Boswell, WWTP Operator	(937) 408-7926	
Name, Address and Title of Responsible Official	Phone Number	
James Geyer, Owner P.O. Box 354 Oxford, Ohio 45056	(513) 523-6239	

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	U	Compliance Schedule
S	Operations & Maintenance	U	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
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
3/24/08 Date	3/24/08 Date

Summary of Findings / Comments

Areas Requiring a Response

A review of the Monthly Operating Reports (MORs) for January 2007 through January 2008 indicated numerous NPDES Permit violations. A list of these violations is found in Attachment I. These violations have 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 NPDES Permit for the Millville MHP (Millville) became effective on May 1, 2003. The NPDES Permit contained a compliance schedule for complying with the final effluent limits that became effective on May 1, 2006. The NPDES Permit addresses this in Part I.C titled "Schedule of Compliance." In this schedule, a Permit to Install application was required to be submitted by May 1, 2005. Construction was required to be started by November 1, 2005. Construction was required to be completed by April 1, 2006. Millville finally submitted on September 6, 2007 a Permit to Install application for the WWTP upgrade. Millville must confirm that the WWTP upgrade construction will be initiated as soon as possible. The dates for completing this construction must also be included.

The WWTP consist of a trash trap, aeration tank, and clarifier. A portable storage tank has also been provided for sludge wasting. The trash trap has not been pumped for several years. This tank must be pumped as soon as possible.

Flow is currently estimated by water usage records. The flow is required to be reported as gpd. A review of the MORs indicates that the flow is being reported as MGD. Millville must correctly monitor and report the WWTP discharge flow rate.

Areas Not Requiring a Response

The NPDES Permit requires the WWTP be under the supervision of a Class I wastewater treatment plant operator. The WWTP discharge also must be monitored and reported in accordance to the NPDES Permit. Between January 1 and March 31, 2007, Millville failed to provide a certified operator. In addition, MORs were not submitted for this period.

As of December 31, 2007, the park was sold to James Geyer. Island Lake MHP personnel check daily this park and the WWTP.

On March 18, 2008, someone vandalized the WWTP. Rocks were dumped into the clarifier, and the sludge holding tank was pushed over. Millville was able to quickly restore the WWTP operations.

Attachment I

Millville MHP

Effluent Limit Violations for April 2007 through January 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
June 2007	TSS	Monthly	mg/l	12	185
June 2007	Ammonia	Monthly	mg/l	1.0	23
June 2007	CBOD5	Monthly	mg/l	10	85
June 2007	TSS	Weekly	mg/l	18	185
June 2007	Ammonia	Weekly	mg/l	1.5	23
June 2007	CBOD5	Weekly	mg/l	15	85
August 2007	TSS	Monthly	mg/l	12	68
August 2007	Ammonia	Monthly	mg/l	1.0	23
August 2007	Fecal Coliform	Monthly	#/100ml	1000	520000
August 2007	CBOD5	Monthly	mg/l	10	30
August 2007	TSS	Weekly	mg/l	18	68
August 2007	Ammonia	Weekly	mg/l	1.5	23
August 2007	Fecal Coliform	Weekly	#/100ml	2000	520000
August 2007	CBOD5	Weekly	mg/l	15	30
August 2007	DO	Daily	mg/l	6.0	4.5
December 2007	TSS	Monthly	mg/l	12	128.
December 2007	TSS	Weekly	mg/l	18	128.
December 2007	Ammonia	Monthly	mg/l	3.0	19.
December 2007	Ammonia	Weekly	mg/l	4.5	19.
December 2007	CBOD5	Monthly	mg/l	10	120.
December 2007	CBOD5	Weekly	mg/l	15	120.
December 2007	pH	Daily	S.U.	6.5	5.9
December 2007	DO	Daily	mg/l	6.0	2.4