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State of Ohio Environmental Protection Agency

Southwest District Office

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

August 6, 2008

Ms. Kyra Hornsby
CHS Oxford Inc.
2436 Old Oxford Road
Hamilton, Ohio 45013

Re: Butler County, Golden Years Healthcare, Compliance Evaluation Inspection

Dear Ms. Hornsby:

On July 30, 2008, I conducted a Compliance Evaluation Inspection at the Golden Years Healthcare facility (NPDES Permit # OH0118389; OEPA Permit # 1PT00079*CD). Representing this facility was Frank Schuler and Larry Schnantz. A copy of my inspection report is enclosed.

The inspection report contains two unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. The Records / Reports section was rated unsatisfactory as a result of the failure to submit several Noncompliance Notifications and the 2006 and 2007 annual sludge disposal reports.

The noted effluent violations must be eliminated immediately by upgrading the WWTP. The areas noted in the report summary will require a written response by August 29, 2008. The response should include a description of the proposed actions and the dates for completion of these actions.

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

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Frank Schuler, Engineer



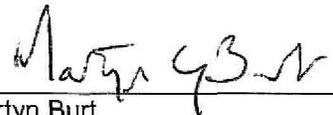
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PT00079*CD	OH0118389	7/30/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Golden Years Healthcare 2436 Old Oxford Road Hamilton, Ohio 45013	9:30 A.M.	10/1/2006
	Exit Time	Permit Expiration Date
	11:50 A.M.	9/30/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Frank Schuler, Engineer Larry Schnantz, Site Maintenance	(513) 326-1551 (513) 893-0471	
Name, Address and Title of Responsible Official	Phone Number	
Kyra Hornsby, Administrator CHS Oxford, Inc. 2436 Old Oxford Road Hamilton, Ohio 45013	(513) 893-0471	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	S	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
8/6/08 Date	8/6/08 Date

Permit #: 1PT00079*CD

NPDES #: OH0118389

Summary of Findings / Comments

Areas Requiring a Response

The WWTP consists of a bar rack, an anoxic tank, an aeration tank, an upflow sludge blanket filter clarifier, a chlorine contact tank, and a dechlorination tank. Post aeration is provided in the dechlorination tank. A grease trap has been provided for the kitchen wastewater. An aerated sludge holding tank has been provided.

A review of the Monthly Operating Reports (MORs) for October 2006 through June 2008 indicated numerous NPDES Permit violations. These violations are addressed on Attachment I. The Golden Years Healthcare facility (Golden Years) has failed to report many of these violations as required by the NPDES Permit. All future violations must be reported as required by the NPDES Permit as detailed in Part III, Section 12 titled "Noncompliance Notification."

These violations are also not acceptable. The treatment system in many cases does not even provide secondary level of treatment. Action must be taken immediately to upgrade the WWTP to comply with the NPDES Permit limits. At a minimum, a tertiary treatment system must be provided. With the current level of treatment, the existing treatment system may even need to be converted to an extended aeration tank followed by a secondary clarifier. Please provide the dates for submitting a Permit to Install application, for starting construction, for completing construction, and for complying with the NPDES Permit limits. Golden Years should plan on completing this construction within the next 9 months.

The NPDES Permit requires that two annual sludge disposal reports be submitted by January 31 of each year. This requirement is addressed in Part II, Section J of the NPDES Permit. Golden Years has failed to submit these reports for the sludge disposed in 2006 and 2007. Golden Years must immediately submit these reports.

Areas Not Requiring a Response

The WWTP effluent flow rate is monitored with a v-notch weir and an ultrasonic measurement device. The WWTP is designed for 22,500 gpd. A review of the MORs for July 2007 through June 2008 indicated the average daily flow was 4170 gpd and the peak daily flow was 33,960 gpd.

In the past, a neighbor has complained about the WWTP odors. At this time, odors no longer appear to be a problem for the WWTP. Golden Years should continue their efforts to minimize the WWTP odors.

Golden Years has now opened the new 50 unit nursing home. The new nursing home is fully occupied. The old 50 unit nursing home has now been converted to a 14 unit assisted living facility. Four of these units are now occupied.

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Winelco continues to monitor the WWTP discharge and to submit the MORs. They also provide the certified operator for the WWTP.

George Septic Service hauls sludge from the WWTP. The sludge is hauled to the Butler County LeSourdsville WWTP.

Attachment I
 Golden Years Nursing Home
 Effluent Limit Violations for October 2006 through June 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
October 2006	Fecal Coliform	Monthly	#/100ml	1000	8000
October 2006	Fecal Coliform	Weekly	#/100ml	2000	8000
October 2006	DO	Daily	mg/l	6.0	5.4
November 2006	TSS	Monthly	mg/l	12	20
November 2006	TSS	Weekly	mg/l	18	20
November 2006	DO	Daily	mg/l	6.0	5.3
November 2006	DO	Daily	mg/l	6.0	5.9
November 2006	DO	Daily	mg/l	6.0	5.4
November 2006	DO	Daily	mg/l	6.0	5.7
November 2006	DO	Daily	mg/l	6.0	5.7
December 2006	DO	Daily	mg/l	6.0	3.9
December 2006	DO	Daily	mg/l	6.0	4.7
December 2006	DO	Daily	mg/l	6.0	5.6
December 2006	DO	Daily	mg/l	6.0	5.3
December 2006	DO	Daily	mg/l	6.0	4.9
January 2007	CBOD5	Monthly	mg/l	10	15
January 2007	TSS	Monthly	mg/l	12	78
January 2007	TSS	Monthly	kg/day	1.0	1.4
January 2007	TSS	Weekly	mg/l	18	78
March 2007	CBOD5	Monthly	mg/l	10	85
March 2007	Ammonia	Monthly	mg/l	3.0	3.3
March 2007	TSS	Monthly	mg/l	12	160
March 2007	TSS	Monthly	kg/day	1.0	1.5
March 2007	CBOD5	Weekly	mg/l	15	85
March 2007	TSS	Weekly	mg/l	18	160
April 2007	TSS	Monthly	mg/l	12	80
April 2007	TSS	Weekly	mg/l	18	80
May 2007	Fecal Coliform	Monthly	mg/l	1000	1400
May 2007	TSS	Monthly	mg/l	12	24
May 2007	Chlorine	Daily	mg/l	0.019	0.08
May 2007	TSS	Weekly	mg/l	18	24
June 2007	TSS	Monthly	mg/l	12	29
June 2007	TSS	Weekly	mg/l	18	29
June 2007	Chlorine	Daily	mg/l	0.019	0.4
June 2007	Chlorine	Daily	mg/l	0.019	0.1
July 2007	Chlorine	Daily	mg/l	0.019	0.05

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Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
July 2007	Chlorine	Daily	mg/l	0.019	0.15
July 2007	Chlorine	Daily	mg/l	0.019	0.1
August 2007	Fecal Coliform	Monthly	#/100ml	1000	4300
August 2007	TSS	Monthly	mg/l	12	90
August 2007	DO	Daily	mg/l	6.0	5.7
August 2007	DO	Daily	mg/l	6.0	5.8
August 2007	Fecal Coliform	Weekly	mg/l	2000	4300
August 2007	TSS	Weekly	mg/l	18	90
August 2007	DO	Daily	mg/l	6.0	5.6
September 2007	CBOD5	Monthly	mg/l	10	17
September 2007	Fecal Coliform	Monthly	#/100ml	1000	8700
September 2007	Ammonia	Monthly	mg/l	1.0	1.2
September 2007	TSS	Monthly	mg/l	12	72
September 2007	TSS	Monthly	kg/day	1.0	1.8
September 2007	CBOD5	Weekly	mg/l	15	17
September 2007	Fecal Coliform	Weekly	#/100ml	2000	8700
September 2007	TSS	Weekly	mg/l	18	72
September 2007	TSS	Weekly	kg/day	1.5	1.8
October 2007	CBOD5	Monthly	mg/l	10	22
October 2007	CBOD5	Weekly	mg/l	15	22
October 2007	Fecal Coliform	Monthly	#/100ml	1000	60000
October 2007	Fecal Coliform	Weekly	#/100ml	2000	60000
October 2007	Ammonia	Monthly	mg/l	1.0	1.1
October 2007	TSS	Monthly	mg/l	12	90
October 2007	TSS	Monthly	kg/day	1.0	1.8
October 2007	TSS	Weekly	mg/l	18	90
October 2007	TSS	Weekly	kg/day	1.5	1.8
November 2007	TSS	Monthly	mg/l	12	13
December 2007	TSS	Monthly	mg/l	12	13
January 2008	CBOD5	Monthly	mg/l	10	11
January 2008	Ammonia	Monthly	mg/l	3.0	5.1
January 2008	Ammonia	Weekly	mg/l	4.5	5.1
February 2008	CBOD5	Monthly	mg/l	10	32
February 2008	CBOD5	Weekly	mg/l	15	32
February 2008	Ammonia	Monthly	mg/l	3.0	13
February 2008	Ammonia	Weekly	mg/l	4.5	13

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Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
February 2008	TSS	Monthly	mg/l	12	42
February 2008	TSS	Weekly	mg/l	18	42
March 2008	CBOD5	Monthly	mg/l	10	90
March 2008	CBOD5	Monthly	kg/day	0.85	1.5
March 2008	CBOD5	Weekly	mg/l	15	90
March 2008	CBOD5	Weekly	kg/day	1.3	1.5
March 2008	Ammonia	Monthly	mg/l	3.0	12
March 2008	Ammonia	Weekly	mg/l	4.5	12
March 2008	TSS	Monthly	mg/l	12	120
March 2008	TSS	Monthly	kg/day	1.0	2.0
March 2008	TSS	Weekly	mg/l	18	120
March 2008	TSS	Weekly	kg/day	1.5	2.0
April 2008	TSS	Monthly	mg/l	12	15
May 2008	Fecal Coliform	Monthly	#/100ml	1000	4300
May 2008	TSS	Monthly	mg/l	12	78
May 2008	TSS	Weekly	mg/l	18	78
May 2008	Fecal Coliform	Weekly	#/100ml	2000	4300
June 2008	CBOD5	Monthly	mg/l	10	19
June 2008	Fecal Coliform	Monthly	#/100ml	1000	3300
June 2008	Ammonia	Monthly	mg/l	1.0	12
June 2008	TSS	Monthly	mg/l	12	14
June 2008	CBOD5	Weekly	mg/l	15	19
June 2008	Fecal Coliform	Weekly	#/100ml	2000	3300
June 2008	Ammonia	Weekly	mg/l	1.5	12.3