

**Environmental
Protection Agency**

Gov. Kasich, Governor
Lee Fisher, Lt. Governor
Chris Maxwell, Director

October 7, 2010

Mr. Jim Moore
Moore Enterprises
4425 West Airport Freeway
Suite 475
Irving, Texas 75062

**RE: Rolling Hills MHP Notice of Violation / Reconnaissance Inspection, NPDES
Permit No. 1PV00047*ED/OH0046850, Champaign**

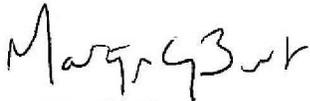
Dear Mr. Moore:

On October 5, 2010 Joe Reynolds inspected the Rolling Hills MHP waste water treatment plant, 5579 Springfield Urbana Pike, Urbana Township, Champaign County. The inspection was conducted as part of a compliance review of the plant with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit issued to the park.

The findings from this inspection are included in the attached report. The report contains three items that require a response. Please provide a written response to these items by the dates noted in the inspection report.

If you have any questions regarding the report, you may contact Joe Reynolds at (937) 285-6097.

Sincerely,



Martyn G. Burt
Division of Surface Water

Enclosure

cc: Robert Armstrong, Winelco
Mike Roberts, Manager



State of Ohio Environmental Protection Agency
Southwest District Office

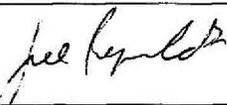
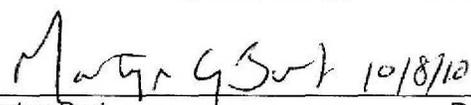
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00047*ED	OH0046850	10/5/2010	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Rolling Hills MHP 5579 Springfield Urbana Pike Urbana, Ohio 43078	10:00 AM	8/1/2007
	Exit Time	Permit Expiration Date
	11:35 AM	7/31/2012
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Bob Armstrong, Operator Mike Roberts, Manager		(513) 317 - 8672 (937) 408 - 3133
Name, Address and Title of Responsible Official		Phone Number
Jim Moore, Moore Enterprises 4425 West Airport Freeway Road Suite 475 Irving, Texas 75062		

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

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

Inspector	Reviewer
 Date: 10/7/10	 Date: 10/8/10
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Inspection Findings

The Rolling Hills MHP currently holds National Pollutant Discharge Elimination System (NPDES) permit number 1PV00047*ED, OH0046850. This permit expires July 31, 2012.

The Rolling Hills MHP waste water system consist of an influent lift station, flow equalization, (2) extended aeration tanks, (2) clarifiers, a dosing tank, (4) tertiary sand filters, UV disinfection, and aerated sludge holding.

Standby power currently is unavailable to the plant. A vac truck is used to remove solids from the system during power outages. The cost to install a back-up generator is currently being evaluated.

All of the pumping facilities (lift station, equalization tank, and tertiary dosing) are alarmed. Maintenance staff performs daily inspections of the entire system to ensure system performance.

Robert Armstrong along with Robert Gomez and Andrew Grinner serve as the Operators of Record for the plant. An Operator of Record log, in accordance with Ohio Administrative Code 3745 – 7 – 09, "Recordkeeping requirements and responsibilities of a certified operator", will need to be developed for the plant.

Waste Activated Sludge is hauled to the City of Urbana on a weekly basis. Currently the sludge tank aeration system is activated prior to hauling. In order to ensure that the tank is maintained in an aerobic state, the aeration system should be run on a regular basis.

A review of the Electronic Discharge Monitoring Reports (EDMR's) from April, 2007 through August, 2010 has revealed the following violations: **Frequency** – Temperature (3), flow (1), Color (3), Odor (3), Turbidity (3); **Code Violations** – Dissolved Oxygen (2); **Final Effluent Limitations Violation** – Ammonia (4), and Dissolved Oxygen (30).

Facility Inspection

All of the influent flow is pumped to the treatment system. The lift station has two pumps and is alarmed to notify staff when the second pump comes on.

From the lift station flow is pumped to the equalization tank. The equalization tank has two pumps. The distribution piping returns part of the pumped flow to equalization tank to control flow rates through the treatment system.

The system has two aeration tanks. The tanks are run in parallel. The tanks were being mixed uniformly. The mixed liquor was brown. The return was chocolate brown. Individual blowers serve each of the aeration systems.

The clarifiers in both tanks had a clear zone to about three feet. A uniform sludge blanket was noted. Minor Pin floc solids were rising in the tanks. The effluent was clear with minor amount solids leaving the tanks. Old solids were noted behind the influent baffles in both tanks. These solids should be removed.

After the clarifiers flow enters the tertiary dosing tank. Two pumps (one lead and one lag) are being used to dose the tertiary sand filters.

The plant has four tertiary filters. New sand was added to all the filters last week. There were no solids or weeds on any of the filters. One filter is used at a time.

The UV disinfection system was on line. The system is a U tube system with two lights. This system is completely closed in PVC. Consideration should be given to a watt meter as a means to verify system function.

The final outfall was clear, no solids, and no foam. There were no solids in the stream channel. The final outfall sign was installed in accordance with the permit requirement.

Items Requiring a Response

1. Please provide an update detailing the findings of the study into establishing a back-up power source for the plant. This update must be submitted by no later than November 29, 2010.
2. Please provide a copy of the Operator of Record form as completed and sent to Ohio EPA, Central Office by no later than November 8, 2010.
3. In accordance with Ohio Revised Code 3745 – 7 – 09, “Recordkeeping requirements and responsibilities of a certified operator”, an Operator of Record log book will need to be developed for the plant. Written verification as to the implementation of the operator’s log must be submitted to this office by no later than November 8, 2010.