



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 19, 2011

Les Bowman, Investco, Inc.
5888 State Route 36
Piqua, OH 45356

**RE: NOTICE OF VIOLATION/Compliance Evaluation Inspection
Paris Court Mobile Home Park Wastewater Treatment Plant
NPDES Permit 1PV00109*BD/OH0127566
Spring Creek Township, Miami County**

Dear Mr. Bowman,

On December 13, 2011, I conducted a Compliance Evaluation Inspection (CEI) at the Paris Court Mobile Home Park wastewater treatment plant. This inspection was conducted to review compliance with the NPDES permit requirements. A detailed inspection report is attached.

Ohio EPA has reviewed the self-monitoring reports for the Paris Court MHP wastewater treatment plant for the period of March 2011 to November 2011. This review revealed continued incidences of non-compliance with regards to meeting the effluent numeric limitations of your NPDES permit. Reported parameters with effluent limitation violations include Nitrogen-Ammonia, CBOD 5-day, Dissolved Oxygen (minimum), and Total Suspended Solids (TSS).

Non-compliance notification is required by Part III, Item 12 of the NPDES permit. Any future incidences of non-compliance need to be reported as per the NPDES permit.

The response to the last inspection indicated that sludge removed is land applied by Alexander's Sewer and Drain. Alexander's is not approved for the land application of sludge. Alexander's has approval to land apply domestic septage from the Miami County Health Department.

Provide a response to this inspection by **January 13, 2011**. Your response should include:

1. **I/I Schedule** - An aggressive schedule for removal of infiltration and inflow into the collection system with defined dates for completion of actions. Infiltration and inflow was identified as the biggest contributor to observed effluent limitation violations by your contract operator.

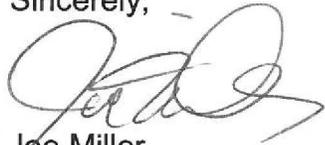
2. **WWTP Improvement Schedule** – Provide a schedule for any other improvements deemed necessary for meeting effluent limitations.

3. **Sludge Disposal** – As detailed above, Alexander's Sewer and Drain is not approved for land application of sludge. Provide an approved means of sludge disposal.

4. **Operator of Record Form (ORC)** – Submit a completed Operator of Record form. The form is enclosed.

Should you have any questions, I can be reached at (937) 285-6109 or joe.miller@epa.ohio.gov.

Sincerely,



Joe Miller
Division of Surface Water

ec: Miami County Health Department
Bob Gomez, Winelco Inc.
Les Bowman, Investco

Enclosures

Permit # : 1PV00109*BD
 NPDES #: OH0127566

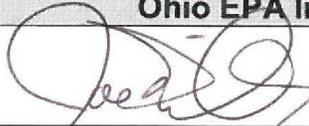
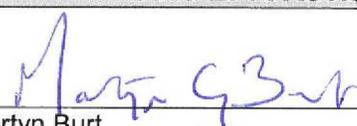


State of Ohio Environmental Protection Agency
 Southwest District Office

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
1PV00109*BD	OH0127566	12/13/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Paris Court Mobile Home Park 10220 County Road 25A Piqua, OH 45356	12:20 PM	August 1, 2007
	Exit Time	Permit Expiration Date
	12:45 PM	July 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
N/A		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Bob Gomez, Winelco 6141 Centre Park Drive West Chester, OH 45069	513-775-8050	
Name, Address and Title of Responsible Official	Phone Number	
Les Bowman, Owner Investco, Inc. 5888 State Route 36 Piqua, OH 45356	937-603-3456	

Ohio EPA Inspector	Ohio EPA Reviewer
 Date 12/19/11	 Date 12/20/11
Joe Miller Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Average Daily Design Flow:	17,100 Gallons/Day
Plant Serves:	MHP (56 lots and 2 bdrm apartment)
Average Daily Flow: (Period of Review):	10,700 Gallons per day (March 2011 to November 2011)
Method of flow monitoring:	Dosing pump hour meter
Type of alarms for plant:	Visual

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Unknown**

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Dark Brown**
 Quality of Sludge: **Medium**
 Foam: **Light (dark)**
 Odor: **Slight**

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

Maintenance of aerating equipment is...**Unknown**

Comments/Status:

Grating and blower housing are rusted. Algae growth on grating from RAS and skimmer overspray.

**Secondary Treatment
(Settling)**

Clarity: **Unknown**
 Condition of Weir: **Unknown**
 Weir is level: **Unknown**
 Effluent in weir: **Unknown**
 Clarifier walls need scraped: **Unknown**

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

Unable to access.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" 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:

One sand filters flooded and others holding water/ice (see photo).

Sludge Handling/Storage Disposal

Hauler name: Alexanders's Sewer and Drain, Casstown Ohio
 Disposal Site: Unknown
 Sludge wasted from: sludge holding tank
 How often is sludge wasted: as needed, determined by operator
 Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Unknown**

Comments/Status:

Alexander's Sewer and Drain is not approved for land application of sludge.

Plant Discharge

Discharge point is: **Field tile to an unnamed tributary of Rush Creek**
 Name of discharge point: **001**
 Discharge is visible: **No** Quality of Effluent: **Unknown**

Comments/Status:

Post aeration operating. Discharge is to a field tile. Field tile blockage has historically been problematic.

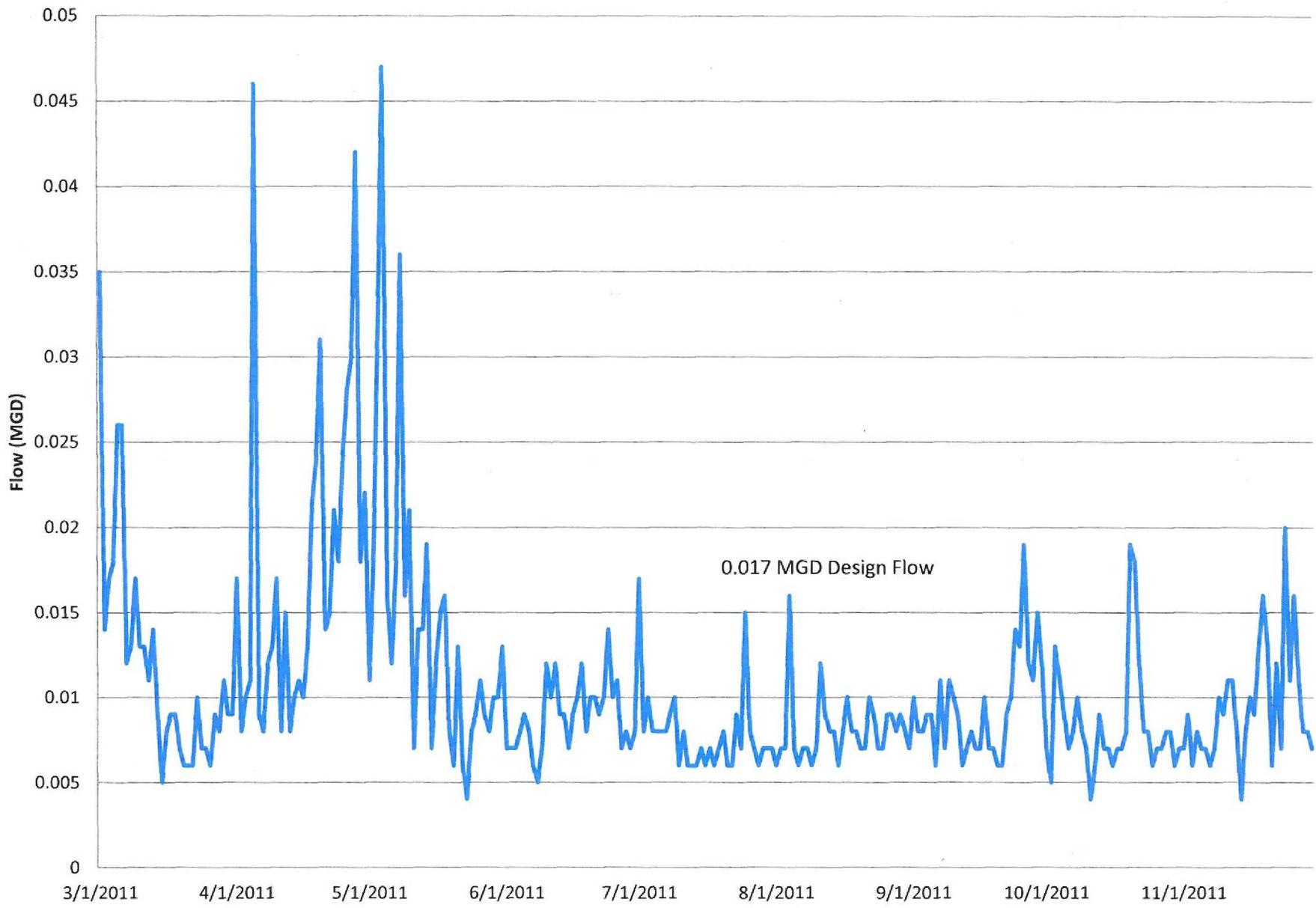
Effluent Limitation Violations – Paris Court MHP WWTP – March 2011 to November 2011

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.06	.12241	4/1/2011
April 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.1	.12241	4/22/2011
May 2011	001	00530	Total Suspended Solids	30D Conc	12.0	266.	5/1/2011
May 2011	001	00530	Total Suspended Solids	7D Conc	18.0	526.	5/8/2011
May 2011	001	00530	Total Suspended Solids	30D Qty	0.8	7.50187	5/1/2011
May 2011	001	00530	Total Suspended Solids	7D Qty	1.2	13.9363	5/8/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.2	.32021	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.3	.32021	5/1/2011
May 2011	001	80082	CBOD 5 day	30D Conc	10.0	213.15	5/1/2011
May 2011	001	80082	CBOD 5 day	7D Conc	15.0	420.	5/8/2011
May 2011	001	80082	CBOD 5 day	30D Qty	0.65	6.12432	5/1/2011
May 2011	001	80082	CBOD 5 day	7D Qty	0.97	1.12074	5/1/2011
May 2011	001	80082	CBOD 5 day	7D Qty	0.97	11.1279	5/8/2011
May 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	5/4/2011
May 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	3.2	5/11/2011



Figure 1. Paris Court MHP WWTP sand filters, JGM 12/13/11

Paris Court MHP WWTP Flow (MGD) March 2011 to November 2011





Environmental Protection Agency
Division of Drinking and Ground Waters
Operator Certification Unit

Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: http://www.epa.ohio.gov/ddagw/opcert.aspx

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #: _____ STU #: _____ Classification: _____

 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III. OPERATOR OF RECORD INFORMATION

Add Additional (A), Existing (E), New (N) or Remove (R)	Effective Date	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. I have a valid certification of a class equal to or greater than the classification of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____ hours/week _____ days/week

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	