Ohio | Environmental Protection Agency

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

December 28, 2011

Mr. Jim Brett
Westland Development Limited Corporation
5700 Dry Fork Road
Cleves, Ohio 45002

Re: Hamilton County, Dry Fork MHP, Compliance Evaluation Inspection

Dear Mr. Brett:

On December 9, 2011, I conducted a Compliance Evaluation Inspection at the Dry Fork MHP (NPDES Permit No. OH0109380; OEPA Permit No. 1PY00001*BD). The inspection was also conducted as part of renewing your NPDES Permit. You were representing this facility. A copy of my inspection report is enclosed.

The inspection report contains three unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the numerous NPDES Permit violations. The Records / Reports section was rated unsatisfactory as a result of the failure to submit numerous timely Discharge Monitoring Reports, Noncompliance Notifications, and annual sludge disposal reports. The Permit section was rated unsatisfactory as a result of the failure to submit a timely NPDES Permit renewal application.

On June 24, 2011, you were notified that your NPDES Permit renewal application had not been submitted as required. In this letter, I indicated that enforcement action would be recommended by this office if the NPDES Permit renewal application was not submitted by July 31, 2011. The renewal application was not submitted until November 15, 2011. As a result, this office has recommended enforcement action be taken pursuant to Ohio Revised Code Chapter 6111.

The areas noted in the report summary will require a written response by January 20, 2012. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

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

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

OhioEPA

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**
1PY00001*BD	OH0109380	12/9/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
Dry Fork MHP 5700 Dry Fork Road Cleves, Ohio 45002	10:00 A.M.	11/1/2006
	Exit Time	**Permit Expiration Date**
	12:05 P.M.	10/31/2011
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Jim Brett, Owner	(513) 265-7481	
Name, Address and Title of Responsible Official	**Phone Number**	
Jim Brett, Owner 5700 Dry Fork Road Cleves, Ohio 45002	(513) 265-7481	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
U	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	S	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 12/28/11	Martyn Burt 12/28/11
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date	Date

Permit #: 1PY00001*BD
NPDES #: OH0109380

Average Daily Design Flow:	**31,200 Gallons/Day**
Plant Serves:	100 unit Mobile Home Park
Average Daily Flow: (Period of Review):	**11,000 Gallons/Day (November 2010 to October 2011)**
Method of flow monitoring:	**surface sand filter dosing pump meter**
Type of alarms for plant:	**High water alarms**

Pretreatment

Type of Pretreatment: **Trash Trap**
Does the Trash Trap need pumped: **No**
Maintenance of pretreatment components is: **Good**

Comments/Status:

Tri State Liquid Waste pumps trash trap once every month.

Secondary Treatment (Aeration)

Color of sludge: **Medium Brown**
Quality of Sludge: **Medium**
Foam: **None present**
Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	☒	☐	Plant is septic	☐	☒
Blowers are operating	☒	☐	Blowers are on a timer	☒	☐
Skimmers are operating	☒	☐	Plant is flooded	☐	☒
Diffusers are operating	☒	☐	Grating is present	☐	☒
Sludge return is operating	☒	☐			

Maintenance of aerating equipment is...**Good**

Comments/Status:

None.

Secondary Treatment (Settling)

Clarity: **Clear**
Condition of Weir: **Clean**
Weir is level: **Yes**
Effluent in weir: **Clear**

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Clarifier walls need scraped: **No**

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

Comments/Status:

None.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand filters: **Slow**	☒	☐	**Subsurface**	☐	☒
Distribution box operating	☒	☐	Beds alternated	☒	☐
Are filters ponding/flooding	☐	☒	Beds raked	☒	☐
Sand filters overgrown	☐	☒	Chlorination present	☒	☐
UV present	☐	☒	Dechlorination present	☒	☐

Overall maintenance of components is: **Good**

Comments/Status:

None.

Sludge Handling/Storage Disposal

Hauler name: **Tri State Liquid Waste**
Disposal Site: **MSD Mill Creek WWTP**
Sludge wasted from: **Secondary Clarifier**
How often is sludge wasted: **Once every 3 to 4 weeks**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Sludge was recently hauled from the WWTP for the first time in 8 years.

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Dry Fork of the Whitewater River**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

None.

Summary of Findings / Comments

Areas Requiring a Response

An annual sludge disposal report is required to be submitted by January 31 of each following year. This is addressed in Part II, Section K of the NPDES Permit. The 2007, 2008 and 2010 annual sludge disposal reports were not submitted as required by the permit.

A review of the Discharge Monitoring Reports (DMRs) for January 2008 through October 2011 indicated numerous effluent violations. These violations are listed on Attachment I. You have failed to report these violations in accordance to the NPDES Permit. Better effort must be taken to prevent future violations. Future violations must be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification." NPDES Permit violations may also be reported in accordance to the new Ohio EPA reporting requirements. These reporting requirements are addressed at the following Ohio EPA website: http://www.epa.state.oh.us/dsw/permits/permits.aspx . Please indicate what actions will be taken to prevent future violations and to report any violations that do occur.

Dry Fork MHP collects the WWTP effluent samples. The temperature, dissolved oxygen, chlorine residual and pH are tested on-site. The TSS, Ammonia, Fecal Coliform and CBOD5 wastewater samples are analyzed by Dennis Feichtner. Standard Operating Procedures (SOPs) for the tests conducted by the Dry Fork MHP must be developed. An SOP for the wastewater sample collection and handling must also be developed. Dry Fork MHP does not have any written SOPs. These written SOPs must be completed by May 31, 2012. Once completed, please provide the Ohio EPA with a copy of these SOPs. A General Lab Criteria checklist was provided during the inspection. We will be using this check list during future inspections.

The TSS, ammonia and CBOD5 wastewater samples are taken as grab samples. The NPDES Permit requires that these samples be taken as composites. The composite sampling requirements are addressed in Part II, Section E of the NPDES Permit.

You were sent Notice of Violation letters dated September 8, 2008; April 21, 2011 and June 24, 2011. In addition, you were sent Compliance Evaluation Inspection reports dated November 20, 2008 and September 21, 2009. Dry Fork MHP was required to submit responses for each of these correspondences. However, you did not address any of them.

Area Not Requiring a Response

The NPDES Permit expired on October 31, 2011. The permit required that a renewal application be submitted 180 days prior or by April 30, 2011. Dry Fork MHP failed to submit this renewal application until November 15, 2011.

The DMRs are required to be submitted by the 20th of the following month. This requirement is addressed in NPDES Permit in Part III, Section 4 titled "Reporting." Numerous reports have been submitted late. These late reports are addressed on Attachment II.

The WWTP consists of a trash trap, a flow equalization tank, two aeration tank, two secondary clarifiers, two surface sand filters, a chlorine contact tank and a dechlorination tank with post aeration. An aerated sludge holding tank is also provided. The surface sand filters both appear to need additional sand.

The WWTP is designed for an average daily flow rate of 31,200 gpd and a peak daily flow rate of 107,522 gpd. For November 2010 through October 2011, the average daily flow rate was 11,000 gpd, and the peak daily flow rate was 19,000 gpd.

The park has a permitted capacity of 100 mobile homes. Currently, only 89 spaces are occupied.

The WWTP is required to be under the supervision of a Class I wastewater operator. Jim Brett is currently a Class I wastewater operator. The required Operator of Record form was submitted on January 31, 2011. The required operator log book is maintained at the WWTP.

Attachment I

Dry Fork MHP

Effluent Limit Violations for January 2008 through October 2011

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
January 2008	Ammonia	Monthly	mg/l	3.0	9.1
January 2008	Ammonia	Monthly	kg/day	0.35	0.50
January 2008	Ammonia	Weekly	mg/l	4.5	9.1
January 2008	Ammonia	Weekly	mg/l	4.5	9.2
May 2008	Ammonia	Monthly	mg/l	1.0	3.5
May 2008	Ammonia	Monthly	kg/day	0.12	0.19
May 2008	Ammonia	Weekly	mg/l	1.5	4.9
May 2008	Ammonia	Weekly	kg/day	0.18	0.30
May 2008	Ammonia	Weekly	mg/l	1.5	2.0
June 2008	Ammonia	Monthly	mg/l	1.0	9.1
June 2008	Ammonia	Weekly	mg/l	1.5	9.1
July 2008	Fecal Coliform	Monthly	#/100ml	1000	3111
July 2008	Ammonia	Monthly	mg/l	1.0	4.7
July 2008	Ammonia	Monthly	kg/day	0.12	0.18
July 2008	Ammonia	Weekly	mg/l	1.5	8.5
July 2008	Ammonia	Weekly	kg/day	0.18	0.33
July 2008	Fecal Coliform	Weekly	#/100ml	2000	2200
July 2008	Ammonia	Weekly	mg/l	1.5	5.0
July 2008	Fecal Coliform	Weekly	#/100ml	2000	4400
September 2008	Ammonia	Monthly	mg/l	1.0	1.7
September 2008	Ammonia	Weekly	mg/l	1.5	3.3
May 2009	Fecal Coliform	Monthly	#/100ml	1000	4582
May 2009	Fecal Coliform	Weekly	#/100ml	2000	2100
May 2009	Fecal Coliform	Weekly	#/100ml	2000	10000
May 2009	Ammonia	Monthly	kg/day	0.12	0.61
May 2009	Ammonia	Weekly	mg/l	1.5	19
May 2009	Ammonia	Weekly	kg/day	0.18	0.61
May 2009	Fecal Coliform	Weekly	#/100ml	2000	10000
June 2009	CBOD5	Monthly	mg/l	10	11
June 2009	Ammonia	Monthly	mg/l	1.0	10
June 2009	Ammonia	Monthly	kg/day	0.12	0.53
June 2009	Ammonia	Weekly	mg/l	1.5	14
June 2009	Ammonia	Weekly	kg/day	0.18	0.75
June 2009	Ammonia	Weekly	mg/l	1.5	5.8
June 2009	Ammonia	Weekly	kg/day	0.18	0.31
July 2009	Ammonia	Monthly	mg/l	1.0	6.5
July 2009	Ammonia	Monthly	kg/day	0.12	0.23

Permit #: 1PY00001*BD
NPDES #: OH0109380

Attachment I

Dry Fork MHP

Effluent Limit Violations for January 2008 through October 2011

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
July 2009	Ammonia	Weekly	mg/l	1.5	13
July 2009	Ammonia	Weekly	kg/day	0.18	0.45
August 2009	Fecal Coliform	Monthly	#/100ml	1000	3800
August 2009	Fecal Coliform	Weekly	#/100ml	2000	3800
February 2010	CBOD5	Weekly	kg/day	1.8	2.3
May 2010	Ammonia	Monthly	mg/l	1.0	1.1
May 2010	Ammonia	Weekly	mg/l	1.5	1.8
July 2010	Ammonia	Weekly	mg/l	1.5	1.6
May 2011	Ammonia	Monthly	mg/l	1.0	1.5
May 2011	Ammonia	Weekly	mg/l	1.5	3.1

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Attachment II

Dry Fork MHP

Late Discharge Monitoring Reports

Facility	Station	Required Report Period	DMR Received	DMRs Submitted Late
Dry Fork MHP	1	1/1/2008	7/22/2008	Yes
Dry Fork MHP	1	2/1/2008	7/22/2008	Yes
Dry Fork MHP	1	3/1/2008	7/22/2008	Yes
Dry Fork MHP	1	3/1/2008	7/22/2008	Yes
Dry Fork MHP	1	4/1/2008		Missing Report
Dry Fork MHP	1	5/1/2008	7/22/2008	Yes
Dry Fork MHP	1	6/1/2008	7/22/2008	Yes
Dry Fork MHP	1	7/1/2008	8/22/2008	Yes
Dry Fork MHP	1	8/1/2008	10/24/2008	Yes
Dry Fork MHP	1	9/1/2008	10/24/2008	Yes
Dry Fork MHP	1	10/1/2008	2/21/2009	Yes
Dry Fork MHP	1	11/1/2008	9/15/2009	Yes
Dry Fork MHP	1	12/1/2008	9/15/2009	Yes
Dry Fork MHP	1	1/1/2009	9/15/2009	Yes
Dry Fork MHP	1	2/1/2009	9/15/2009	Yes
Dry Fork MHP	1	3/1/2009	9/15/2009	Yes
Dry Fork MHP	1	4/1/2009	9/15/2009	Yes
Dry Fork MHP	1	5/1/2009	9/15/2009	Yes
Dry Fork MHP	1	6/1/2009	9/15/2009	Yes
Dry Fork MHP	1	7/1/2009	9/15/2009	Yes
Dry Fork MHP	1	8/1/2009	9/15/2009	No
Dry Fork MHP	1	9/1/2009	10/19/2009	No
Dry Fork MHP	1	10/1/2009	11/23/2009	Yes
Dry Fork MHP	1	11/1/2009	12/17/2009	No
Dry Fork MHP	1	12/1/2009	1/18/2010	No
Dry Fork MHP	1	1/1/2010	2/19/2010	No
Dry Fork MHP	1	2/1/2010	3/17/2010	No
Dry Fork MHP	1	3/1/2010	4/20/2010	No
Dry Fork MHP	1	4/1/2010	5/17/2010	No
Dry Fork MHP	1	5/1/2010	6/17/2010	No
Dry Fork MHP	1	6/1/2010	7/26/2010	Yes
Dry Fork MHP	1	7/1/2010	8/18/2010	No
Dry Fork MHP	1	8/1/2010	9/13/2010	No
Dry Fork MHP	1	9/1/2010	10/18/2010	No
Dry Fork MHP	1	10/1/2010	11/17/2010	No
Dry Fork MHP	1	11/1/2010	12/14/2010	No
Dry Fork MHP	1	12/1/2010	1/12/2011	No

Attachment II

Dry Fork MHP

Late Discharge Monitoring Reports

Facility	Station	Required Report Period	DMR Received	DMRs Submitted Late
Dry Fork MHP	1	1/1/2011	2/9/2011	No
Dry Fork MHP	1	2/1/2011	3/18/2011	No
Dry Fork MHP	1	3/1/2011	4/6/2011	No
Dry Fork MHP	1	4/1/2011	5/9/2011	No
Dry Fork MHP	1	5/1/2011	6/20/2011	No
Dry Fork MHP	1	5/1/2011	7/18/2011	Yes
Dry Fork MHP	1	6/1/2011	7/18/2011	No
Dry Fork MHP	1	7/1/2011	8/18/2011	No
Dry Fork MHP	1	8/1/2011	9/14/2011	No
Dry Fork MHP	1	9/1/2011	10/20/2011	No
Dry Fork MHP	1	10/1/2011	11/17/2011	No