



Environmental
Protection Agency

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

March 16, 2012

Mr. Brian Bremer
Crouse MHP
4141 Hamilton – Eaton Road
Hamilton, Ohio 45011

**Re: Butler County, Crouse MHP, Compliance Evaluation Inspection and
Notice of Violation**

Dear Mr. Bremer:

On February 27, 2012, I conducted a Compliance Evaluation Inspection at the Crouse MHP (NPDES Permit No. OH0118923; OEPA Permit No. 1PV00095*DD). You were representing this facility. A copy of my inspection report is enclosed.

The inspection report contains two unsatisfactory areas. The Effluent / Receiving Water section was rated as unsatisfactory as a result of the significant noncompliance with the effluent limits. The Operations & Maintenance section was rated unsatisfactory as a result of the deficiencies noted with the certified operator staffing requirements and with the WWTP operations.

The facility has been in significant noncompliance with the monthly ammonia limits for October and November 2011. These violations have been the result of equipment breakdowns that have not been fixed in a timely manner. The Ohio EPA is very concerned about facilities that are in significant noncompliance of their effluent limits. If substantial compliance with your effluent limits is not maintained between December 2011 and May 2012, this office will recommend that enforcement action be taken. Please take all necessary action to prevent future violations.

Mr. Brian Bremer
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The areas noted in the report summary will require a written response by April 6, 2012. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

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

Sincerely,



Ned Sarle
Environmental Specialist
Division of Surface Water
Permits Section

Enclosure

cc: Eric Gibson, Winelco, Inc.

NS/bp



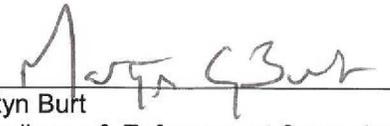
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00095*DD	OH0118923	2/27/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Crouse MHP 4141 Hamilton - Eaton Road Hamilton, Ohio 45011	10:45 A.M.	1/1/2011
	Exit Time	Permit Expiration Date
	11:30 A.M.	12/31/2015
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Brian Bremer, Owner		(513) 726-4831
Name, Address and Title of Responsible Official		Phone Number
Brian Bremer, Owner 4141 Hamilton - Eaton Road Hamilton, Ohio 45011		(513) 726-4831 (513) 309-5417 (c)

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	S	Compliance Schedule
U	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
3/16/12 Date	3/16/12 Date

Permit #: 1PV00095*DD
 NPDES #: OH0118923

Average Daily Design Flow:	40,000 Gallons/Day
Plant Serves:	109 lot mobile home park
Average Daily Flow: (Period of Review):	9600 Gallons/Day (August 2010 through January 2012)
Method of flow monitoring:	elapse time meter on dosing pumps
Type of alarms for plant:	Audio / visual for pump station & dosing tank.

Pretreatment

Type of Pretreatment: **Other**
 Does the Trash Trap need pumped: **N/A**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

Influent grinder pumps.

**Secondary Treatment
(Aeration)**

Color of sludge: **Medium Brown**
 Quality of Sludge: **Medium**
 Foam: **Light (dark)**
 Odor: **No objectionable odor present**

	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...**Good**

Comments/Status:

Blowers are on for 45 minutes and off for 15 minutes.

**Secondary Treatment
(Settling)**

Clarity: **Clear**
 Condition of Weir: **Excessive Algae/Solids Build Up**
 Weir is level: **Yes**

Permit #: 1PV00095*DD
NPDES #: OH0118923

Effluent in weir: **Clear**
Clarifier walls need scraped: **Yes**

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

Comments/Status:

Clarifiers walls should be scraped once every day.

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 type="checkbox"/>	<input checked="" 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: **Good**

Comments/Status:

None.

Sludge Handling/Storage Disposal

Hauler name: **Rumpke Special Wastewater**
Disposal Site: **Rumpke Sanitary Landfill**
Sludge wasted from: **Secondary Clarifier return sludge**
How often is sludge wasted: **Weekly**
Sludge drying beds: **Yes** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Two sludge drying beds are provided.

Plant Discharge

Discharge point is a: **Ditch**
Name of discharge point: **Unnamed tributary of Nine Mile Creek**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

None.

Permit #: 1PV00095*DD
NPDES #: OH0118923

Summary of Findings / Comments

Areas Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) for August 2010 through January 2012 indicated numerous permit violations. These violations are listed on Attachment I. The facility has been in significant noncompliance due to violations of the monthly ammonia limits for October and November 2011. Significant noncompliance occurred when the violations exceeded 1.4 times the monthly limits for ammonia for two months in the six month period. These violations have been the result of equipment breakdowns that have not been fixed in a timely manner. The Ohio EPA is very concerned about facilities that are in significant noncompliance of their effluent limits. If substantial compliance with your effluent limits is not maintained between December 2011 and May 2012, this office will recommend that enforcement action be taken. Please take all necessary action to prevent these violations. All future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

In the past, the surface sand filters would plug, and the wastewater flooded the filters. In addition, significant amounts of wastewater were infiltrating into the ground. This made it difficult to operate the disinfection system. To address this situation, two of the surface sand filters were rebuilt the spring of 2010. Crouse MHP is currently using the two rebuilt filters. The two remaining surface sand filters must also be rebuilt as soon as possible.

The secondary clarifier walls are scraped weekly by Winelco. The clarifier walls should be scraped daily. Excessive scum was also noted on the clarifier surfaces. This condition was also noted in the last WWTP inspection conducted on August 31, 2010. The floating scum needs to be routinely removed to minimize this occurrence.

A sign is required to be provided at the WWTP discharge location. This is addressed in Part II, Section O of the NPDES Permit. This sign has not been provided. Please install this sign immediately. The phone number indicated on this sign should be for the facility contact.

The WWTP is required to be under the supervision of a Class I WWTP operator. The certified operator is required to be at the WWTP three times a week for a minimum of one and a half hours. This requirement is addressed in Part II, Section A of the NPDES Permit. Currently, Winelco operators are listed as the Operators of Record. However, they are at the site only once a week. In addition, they were at the site for 1 hour between November 21-27, 2011 and for 50 minutes between February 6-12, 2012. This does not comply with the minimum staffing requirements. Finally, the operator logbook pages must be numbered.

Permit #: 1PV00095*DD
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Areas Not Requiring a Response

The WWTP consists of a flow equalization basin, two aeration tanks, two secondary clarifiers, a fixed media filter, a dosing tank, four surface sand filters, a chlorine contact tank and a dechlorination tank. An aerated sludge holding tank and two sludge drying beds are also provided. The WWTP discharge was noted as being clear and relatively free of solids.

A building covers many portions of the WWTP. The lighting in this building is very poor. Better lighting should be provided in this building so that the WWTP operations may be monitored better.

The fixed media filters may only be back flushed to the sludge holding tank. The back wash process should allow for the clear water to discharge to the flow equalization tank while the settled sludge should be discharged to the sludge holding tank.

The WWTP flow rate is monitored using the surface sand filter dosing pumps elapse time meters. The treatment plant is designed for an average daily flow rate of 40,000 gpd. A review of the DMRs for the noted period indicated that the average and peak flow rates were 9600 gpd and 35,000 gpd.

Sludge is hauled from the sludge drying beds. In 2011, 4.73 dry tons were hauled to the Rumpke Landfill.

The Ohio EPA has developed information to assist wastewater operators of small sewage treatment systems. This information may be obtained at the following web link: http://www.epa.ohio.gov/dsw/compl_assist/ProcessControl.aspx . You may find this information helpful in the daily operations of your treatment plant.

Attachment I

Crouse MHP

Effluent Limit Violations for August 2010 through January 2012

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
March 2011	TSS	weekly	mg/l	18	20
March 2011	Ammonia	weekly	mg/l	7.5	9.2
May 2011	Chlorine	daily	mg/l	0.034	0.08
May 2011	Chlorine	daily	mg/l	0.034	0.08
May 2011	Chlorine	daily	mg/l	0.034	0.07
May 2011	Chlorine	daily	mg/l	0.034	0.07
May 2011	Chlorine	daily	mg/l	0.034	0.07
July 2011	Ammonia	Monthly	mg/l	2.0	2.2
July 2011	Ammonia	Weekly	mg/l	3.0	4.4
October 2011	Ammonia	Monthly	mg/l	2.0	3.9
October 2011	E. coli	Monthly	#/100 ml	161	300
October 2011	Ammonia	Weekly	mg/l	3.0	7.8
October 2011	DO	Daily	mg/l	6.0	3.5
November 2011	Ammonia	Monthly	mg/l	5.0	8.5
November 2011	Ammonia	Weekly	mg/l	7.5	17