



Environmental
Protection Agency

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

May 22, 2012

Mr. Kreso Mikulic, Owner
Vinoklet Winery
11069 Colerain Avenue
Cincinnati, Ohio 45252

RE: Compliance Inspection/Notice of Violation for Vinoklet, NPDES 1PR00102

Dear Mr. Mikulic:

On May 18, 2012, I conducted a Compliance Evaluation Inspection at the Vinoklet Winery WWTP. A copy of my inspection report is enclosed. As noted in the inspection report, numerous deficiencies were found during the inspection that will need to be addressed.

Given the typical low flows, you may wish to consider a non-discharging on-site sewage disposal system as it would not require an NPDES permit. Flow equalization should address the higher flows your facility receives on the weekends. The addition of Port-a-Johns may address events that would be above the WWTP's typical equalized daily flow (such as festivals, large group events, etc.).

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code Chapter 6111.

Please inform this office, in writing, by June 22, 2012, as to the reason for the violations and/or deficiencies, as well as a description of the actions taken or proposed to prevent any further violations and/or deficiencies. Your response should include the dates, either actual or proposed, for completion of the actions.

If you have any questions regarding the above, please contact me at this office.

Respectfully,

Maureen M. Ware
Environmental Specialist
Division of Surface Water

MMW/tf

cc: Environmental Wastewater Services, LLC

ec: Hamilton County Health Department



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
1PR00102	OH0127141	05/18/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Vinoklet Winery WWTP 11069 Colerain Ave. Cincinnati, Ohio	1:00PM	9/1/10
	Exit Time	Permit Expiration Date
	3:20PM	8/31/15
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Kreso Mikulic, Owner	(513) 385-9309	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Daniel Wuebbeler, ORC Environmental Wastewater Services 8054 Blanchetta Dr. Cincinnati, Ohio 45239	513-526-2077	
Name, Address and Title of Responsible Official	Phone Number	
Kreso Mikulic, Owner 11069 Colerain Ave. Cincinnati, Ohio 45252		

Ohio EPA Inspector	Ohio EPA Reviewer
<i>Maureen M. Ware</i> 5/22/12 Date	<i>Marty G. Burt</i> 5/22/12 Date
Maureen M. Ware Division of Surface Water Southwest District Office	Marty G. Burt Environmental Supervisor Division of Surface Water Southwest District Office

Average Daily Design Flow:	2600 Gallons/Day
Plant Serves:	Winery
Average Daily Flow: (Period of Review):	327 Gallons/Day (1/10-3/12)
Method of flow monitoring:	Pump time calculation (each EQ pump rate is 15 GPM)
Type of alarms for plant:	Light and sound

Pretreatment

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

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Dark Brown**
 Quality of Sludge: **Medium**
 Foam: **None present**
 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>			

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

Comments/Status:

**Secondary Treatment
(Settling)**

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

Overall maintenance of settling components is:

Comments/Status:

Clarifier had been pumped out prior to the inspection along with the sludge holding tank.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input 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:

Sludge Handling/Storage Disposal

Hauler name:
 Disposal Site: **POTW**
 Sludge wasted from: **sludge holding tank and clarifier**
 How often is sludge wasted: **variable**
 Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Record Keeping/ Operator of Record

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... A
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... N
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/E
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

spiral bound.
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - ii. Laboratory results (unless documented on bench sheets)... N/E
 - iii. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N

Comments/Status:

The log book was in a spiral book that pages could be removed. Mr. Mikulic was advised that a hardbound book is needed. A copy of the certificate of the ORC was not displayed on-site. The hours logged in the logbook indicated occasions where the staffing requirements were not exactly met (e.g. one hour per week, but only on one day per week). Two days per week for a total of one hour is what is required by rule 3745-7-04. Proper violation reporting via forms 4498 or 4499 only occurred once (for the D.O. violation of May 14, 2010).

MONITORING FREQUENCY VIOLATIONS

Code	Parameter	Frequency	Reported	Expected	Date
80082	CBOD5	1/quarter	0	1	8/1/11
31648	E. Coli	1/quarter	0	1	8/1/11
00610	NH3	1/quarter	0	1	8/1/11
00530	TSS	1/quarter	0	1	8/1/11

There were 135 violations of the monitoring frequency for Color (code 00083), Odor (code 01330), and Turbidity (code 01350).

There were 424 violations of the monitoring frequency for Flow (code 00056).

FINDINGS:

1. The equalization tank and sludge holding tank approved under PTI 767017 were operating properly. However, it appears that in addition to having the sludge holding tank periodically pumped, the clarifier was also pumped all the way down. Prior to the installation of the sludge holding tank, sludge used to be periodically removed from the clarifier to be hauled to a local POTW. The purpose of the sludge holding tank was to provide consistent operation of the WWTP.
2. No copy of the ORC certificate was displayed on site.
3. Minimum operator staffing requirements were not consistently met (e.g. 1 day per week for one hour instead of 2 days per week for a total of one hour).
4. Operator log book was a spiral bound book with removable pages.
5. Notifications of violation have not been consistently provided.
6. Effluent limit violations, Compliance Schedule Violations, and Monitoring Frequency Violations as noted above occurred.

RECOMMENDATIONS:

1. Only pump waste sludge from the sludge holding tank. Settled sludge in the bottom of the clarifier can now be sent either back to the aeration tank as return activated sludge, or to the sludge holding tank as waste activated sludge. The clarifier should not be completely drained during the operating season of the winery.
2. A photocopy of the ORC certificate must be displayed on-site (such as an office).
3. The WWTP is a class A WWTP. As such, Ohio Administrative Code (OAC) 3745-7-04 requires the ORC to be physically present at the WWTP 2 days per week for a minimum of 1 hour per week. Information about becoming a Class A operator can be found at the following link:
[http://www.epa.state.oh.us/portals/28/documents/opcert/How to become operat or factsheet.pdf](http://www.epa.state.oh.us/portals/28/documents/opcert/How_to_become_operat_or_factsheet.pdf)
4. A hardbound book must be used for the log book.

5. Within 24 hours of discovery, violations must be reported. Information regarding violation reporting can be found at this link:

http://www.epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf

Violations of daily maximum or minimum numerical effluent violations must be documented on form 4499 (which can be found at:

[http://www.epa.ohio.gov/portals/35/permits/24-](http://www.epa.ohio.gov/portals/35/permits/24-hour_reporting_Form4499_limits.doc)

[hour_reporting_Form4499_limits.doc](http://www.epa.ohio.gov/portals/35/permits/24-hour_reporting_Form4499_limits.doc)) and emailed to:

swdo24hournpdes@epa.state.oh.us with a copy to:

Maureen.Ware@epa.state.oh.us

For all other numerical violations, form 4498 (which can be found at:

[http://www.epa.ohio.gov/portals/35/permits/24-](http://www.epa.ohio.gov/portals/35/permits/24-hour_reporting_Form4498_bypasses.doc)

[hour_reporting_Form4498_bypasses.doc](http://www.epa.ohio.gov/portals/35/permits/24-hour_reporting_Form4498_bypasses.doc)) should be emailed to the same email addresses. Non numerical violations can be reported via an email narrative to

maureen.ware@epa.state.oh.us

6. You must provide a reason for the various violations noted above on pages 5 and 6. Per our discussion, it appears that the addition of the equalization tank and sludge holding tank have addressed the numerical violations (the last numerical violation was July 1, 2010, and the tanks were installed autumn of 2010).

Per our discussion, the winery WWTP has very little use during the months of January through April. We discussed how if there is a month with no discharge, select the "No Discharge" check box at the top of the e-DMR form. However, Ohio EPA's records indicate that there were numerous monitoring frequency violations during the months of high use of the WWTP (May through December) for 2010 and 2011.

Your permit (effective date 9/1/2010) had 6 months interim limits for Fecal Coliform of 2000/100 ml effluent weekly, and 1000/100 ml effluent monthly. There was also monitoring only for E. coli. After the first 6 months of the permit, limits for E. coli of 362/100 ml effluent weekly, and 161/100 ml effluent monthly became effective. It was expected that during the first 6 months, you would be able to determine if the chlorination/dechlorination disinfection system was adequate for meeting the E. coli limits. The compliance schedule in part IC of your NPDES permit 1PR00102 required the submittal of a status report regarding the ability/inability of the existing disinfection system in meeting the E. coli limits. No status report was received. Please note that one monitoring frequency violation was for E. coli in August of 2011. The monitoring frequency is now summer quarterly. Please note that monitoring more frequently than the permit requirements is acceptable, provided you report it. To determine if your WWTP can meet the E. coli limits, you should do sampling for E. coli as soon as possible to determine if your existing disinfection system is adequate. If it is, simply email me with the status report being that the existing system is adequate. If it is not adequate, you will need to upgrade to a disinfection system that is capable of meeting the E. coli limits. Ultraviolet (UV) Disinfection systems have typically been found to be capable of meeting the E. coli limits. Please note that you will need a Permit to Install for a UV system.

In closing, you may wish to utilize a non-discharging on-site sewage treatment system such as a Wisconsin Mound as that would not require an NPDES permit. Wisconsin Mound design criteria can be found at the following links:

<http://ohioline.osu.edu/b813/index.html> and
<http://ohioline.osu.edu/b829/index.html>

If the average daily design flow (ADDF) of such a system were below 1000 gallons per day, the Hamilton County Health Department would be the entity to approve plans for such a system. ADDF of 1000 or more would go through Ohio EPA for approval.

If you were interested in a drip irrigation system, information can be found at:
<http://www.epa.state.oh.us/portals/35/guidance/pti5.pdf>