



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

October 26, 2012

Mr. Bob Crable
Joy Acres MHP
564 Miami Trace Road
Loveland, Ohio 45140

RE: Warren County, Joy Acres MHP, Compliance Evaluation Inspection

Dear Mr. Crable:

On October 18, 2012, I conducted a Compliance Evaluation Inspection at the Joy Acres MHP (NPDES Permit No. OH0047139; OEPA Permit No. 1PV00049*AD). The inspection was also conducted as part of renewing the NPDES Permit. Representing this facility was Eric Lynch and Joe Richie. A copy of my inspection report is enclosed.

The inspection report contains two marginal areas. The Effluent / Receiving Waters section was rated marginal as a result of the NPDES Permit violations. The Permit section was rated marginal as a result of the untimely submittal of the NPDES Permit renewal application.

The areas noted in the report summary will require a written response by November 16, 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

NS/tb

ec: Eric Lynch, Winelco, Inc.

Enclosure



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00049*AD	OH0047139	10/18/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Joy Acres MHP 5608 Zoar Road Morrow, Ohio 45152	9:30 A.M.	11/1/2007
	Exit Time	Permit Expiration Date
	10:45 A.M.	10/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Eric Lynch, Winelco, Inc. Joe Richie, Maintenance	(513) 755-8050 (513) 716-7595	
Name, Address and Title of Responsible Official	Phone Number	
Bob Crable, President 564 Miami Trace Road Loveland, Ohio 45140	(513) 314-2992	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
M	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	M	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
<i>Ned Sarle</i> <i>10/26/12</i>	<i>Martyn G Burt</i> <i>10/26/12</i>
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 1PV00049*AD
 NPDES #: OH0047139

Average Daily Design Flow:	35,100 Gallons/Day
Plant Serves:	Mobile Home Park
Average Daily Flow: (Period of Review):	27,200 Gallons/Day (October 2010 through September 2012)
Method of flow monitoring:	dosing filter pump elapse time meters
Type of alarms for plant:	High water alarm for flow EQ and dosing tank.

Pretreatment

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

Comments/Status:

Peak flow for noted period was 218,000 gpd. Park has 116 lots with 86 currently with a mobile home. The trash trap is pumped once every four months. Please see attachment.

**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	<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 30 minutes and off for 30 minutes.

**Secondary Treatment
(Settling)**

Clarity: **Clear**
 Condition of Weir: **Clean**
 Weir is level: **Yes**

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Effluent in weir: **Clear**
Clarifier walls need scraped: **No**

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

Comments/Status:

Clarifier hopper sides are scraped three times a week.

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 type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Good**

Comments/Status:

The surface sand filter has been in use for two months. Sludge was not seen on the surface sand filter. This is a good sign that the solids are being adequately wasted and hauled from the package plant. The flow splitter box was noted as leaking. The facility indicated that they were in the process of having this replaced. This should be done as soon as possible.

Sludge Handling/Storage Disposal

Hauler name: **Winelco, Inc.**
Disposal Site: **Lower Little Miami WWTP**
Sludge wasted from: **Secondary clarifier**
How often is sludge wasted: **Weekly**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Sludge is hauled from the WWTP once every four months. See Attachment.

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Plum Run**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

None.

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Attached Summary of Findings / Comments

Areas Requiring a Response

The WWTP is required to be operated by a Class I Wastewater Operator. Eric Lynch is currently this operator. He has not been added as one of the Winelco operators for this facility. Please submit the necessary form to include him as the Operator of Record for this facility. Finally, please provide documentation showing that he is certified by the State of Ohio as a Class I Wastewater Operator.

Areas Not Requiring a Response

The NPDES Permit Renewal Application was required to be submitted 180 days prior to the expiration date of the permit or by April 30, 2012. The facility failed to submit this renewal application until May 23, 2012. Please ensure that future renewal applications are timely submitted.

The WWTP was designed for an average daily flow rate of 35,100 gpd and a peak daily flow rate of 175,700 gpd. The WWTP flow rate is monitored with an elapse time meter for the surface sand filter dosing pumps. A review of the Discharge Monitoring Reports (DMRs) for October 2010 through September 2012 indicated that the average daily flow rate was 27,200 gpd and the peak daily design flow rate was 218,000 gpd. The facility has a significant amount of infiltration and inflow (I/I) in their sewage collection system. The facility should minimize the I/I as much as possible in the future. Finally, the facility may want to consider cleaning the sanitary sewers and then visually inspecting them to determine if any significant sources of the I/I may be eliminated.

A review of the DMRs for this facility indicated several NPDES Permit violations. The Joy Acres MHP (Joy) has adequately addressed these violations. The facility has undertaken several steps to improve the WWTP operations. As a result, violations have not occurred for the past 15 months. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The WWTP consists of a trash trap, flow equalization basin, two aeration tanks operated in series, one secondary clarifier, a dosing tank, two surface sand filters, a chlorine contact tank, and a dechlorination system. An aerated sludge holding tank is also provided. The facility is in the process of designing a UV disinfection system. We encourage Joy to obtain approval for this system from Ohio EPA and install it as soon as possible.

The surface sand filters are cleaned as needed. The material removed from these filters is hauled to the Rumpke Landfill.

Sludge is hauled to the Warren County Lower Little Miami WWTP. In 2011, 1.5 dry tons of sludge was hauled from the site.

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Attachment I

Joy Acres MHP

Effluent Limit Violations for October 2010 through September 2012

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
May 2011	DO	Daily	mg/l	6.0	5.5
June 2011	TSS	Weekly	mg/l	18	23
June 2011	Ammonia	Monthly	mg/l	1.0	4.2
June 2011	Ammonia	Monthly	kg/day	0.1	0.3
June 2011	Ammonia	Weekly	mg/l	1.5	8.4
June 2011	Ammonia	Weekly	kg/day	0.2	0.7
June 2011	DO	Daily	mg/l	6.0	5.7