



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

September 6, 2013

Mr. John Theis, Owner
JB Capital, LLC
P.O. Box 435
Springboro, Ohio 45066

RE: Butler County, Town and Country MHP, Compliance Evaluation Inspection

Dear Mr. Theis:

On September 4, 2013, a Compliance Evaluation Inspection was conducted at this facility (NPDES Permit No. OH0108804; OEPA Permit No. 1PV00079*DD). Representing the facility was Gail Stidham, Chuck Stidham and Tim Poynter. A copy of my inspection report is enclosed.

All areas reviewed during the inspection were found to be acceptable. However, several areas were noted in the inspection report as requiring a response.

The areas noted in the report summary will require a written response by September 27, 2013. The response should include a description of the actions proposed to correct the noted areas 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 II
Division of Surface Water – Permits Section

NS/tb

Enclosure

ec: Tim Poynter, Poynter Wastewater Services
Gail Stidham, Park Manager



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
1PV00079*DD	OH0108804	9/4/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Town and Country MHP 2243 Hamilton - Cleves Road Hamilton, Ohio 45013	9:35 A.M.	6/1/2010
	Exit Time	Permit Expiration Date
	11:10 A.M.	5/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Tim Poynter, Poynter Wastewater Services	(513) 831-1165	
Gail Stidham, Park Manager	(513) 291-3011	
Chuck Stidham, Lead Park Maintenance	(513) 291-3011	
Name, Address and Title of Responsible Official	Phone Number	
John Theis, Owner JB Capital, LLC P.O. Box 435 Springboro, Ohio 45066	(937) 684-8347	

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
S	Operations & Maintenance	S	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> 9/6/13	<i>Martyn G Burt</i> 9/6/13
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 1PV00079*DD
 NPDES #: OH0108804

Pretreatment

Average Daily Design Flow:	15,000 Gallons/Day
Plant Serves:	Mobile Home Park
Average Daily Flow: (Period of Review):	17,000 Gallons/Day (October 2010 through July 2013)
Method of flow monitoring:	surface sand filter dosing pumps
Type of alarms for plant:	High water alarm

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

Comments/Status:

Trash trap is pumped four times a year by AK Butler.

**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 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:

Blower timer is set for 45 minutes on and 15 minutes off.

**Secondary Treatment
(Settling)**

Clarity: **Clear**
 Condition of Weir: **Clean**
 Weir is level: **Yes**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **No**

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

Comments/Status:

Clarifier walls are scraped daily.

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 type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Good**

Comments/Status:

Very little sludge was observed on the surface sand filters. Any solids removed from the sand filters is bagged and disposed at the Rumpke Landfill.

Sludge Handling/Storage Disposal

Hauler name: **AK Butler**
Disposal Site: **Mill Creek WWTP**
Sludge wasted from: **Secondary Clarifier**
How often is sludge wasted: **As needed**
Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Sludge is hauled from the site four times a year.

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **unnamed tributary of Great Miami River**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Outfall sign is posted as required by the NPDES Permit.

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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 L of your NPDES Permit. This report has not been submitted as required by the NPDES Permit. Please submit a copy of this report to this office. Finally, the December 2012 Discharge Monitoring Reports (DMRs) indicated that "AL" was reported. This indicates that sludge was not removed from the WWTP. This is not correct. The December 2012 DMRs should be resubmitted with the total amount of sludge removed from the WWTP in 2012.

Areas not Requiring a Response

A review of the DMRs for October 2010 through July 2013 indicated several NPDES Permit violations. These violations are addressed below and only consist of loading violations. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification".

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2011	TSS	Monthly	kg/day	0.68	0.93
April 2011	CBOD5	Monthly	kg/day	0.57	0.63
April 2012	CBOD5	Monthly	kg/day	0.57	0.64
May 2012	CBOD5	Monthly	kg/day	0.57	0.61

The WWTP consists of two trash traps, an aeration tank, four secondary clarifiers, a dosing tank, two surface sand filters and an ultraviolet disinfection system. A sludge holding tank is also provided for the WWTP.

The WWTP is designed for an average daily design flow rate (ADF) of 15,000 gpd and a peak daily design flow rate of 75,000 gpd. The review of the DMRs indicated the average daily flow rate was 17,000 gpd and the peak daily flow rate was 135,000 gpd.

We are concerned that the actual flows are exceeding the plant design. In the past year, the park has raised above-ground four sanitary sewer manhole tops. They have also placed caps on unused sewer laterals. The facility should continue their efforts to minimize infiltration and inflow into their sewage collection system. The park should also conduct a dosing pump test to determine if the flow estimates are still accurate. Finally, as more mobile homes are added to the park, the flows may reach a point where the WWTP will have problems complying with the permit limits. If so, additional action may be required at that time.

The park has room for 83 mobile homes. Currently, 22 lots either do not have a mobile home or the mobile home is not being occupied.

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The sewer pipes between the aeration tank and four secondary clarifiers have frequently plugged. WWTP staff is now routinely cleaning these sewer pipes.

Surface sand filter bypasses have been reported in the past. No bypasses have occurred since the last inspection. All future WWTP bypasses must continue to be reported as required by the NPDES Permit, as addressed in Part III.11 titled "Unauthorized Discharges".

Poynter Wastewater Services conducts the wastewater testing for pH, DO, temperature and ammonia. The TSS, E. coli and CBOD5 wastewater samples are tested by Quality Labs.