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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Honorable David Nelson
 James Hockaday
 Village of Geneva-on-the-Lake
 4909 South Warner Drive
 Geneva-on-the-Lake OH 44041

2. Article Number

(transfer from service label) 7010 1060 0000 0059 0000 (Schmidt 11/9/10)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

[Handwritten Signature]

- Agent
- Addressee

B. Received by (Printed Name)

[Handwritten Name]

C. Date of Delivery

[Handwritten Date]

D. Is delivery address different from item 1?

- Yes
- No

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3. Service Type

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- Registered
- Insured Mail
- Express Mail
- Return Receipt for Merchandise
- C.O.D.

4. Restricted Delivery? (Extra Fee)

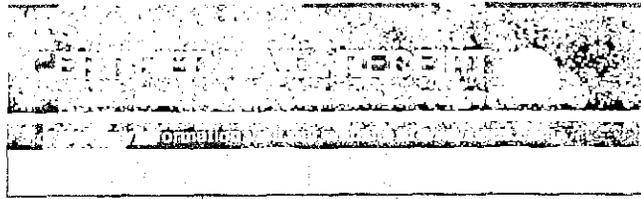
- Yes

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

7010 1060 0000 0059 0000 6622



Postage	\$
Certified Fee	
Postage Insurance (Endorsement)	
Total Postage & Fees	\$

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Send to:

at address:

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

November 8, 2010

RE: ASHTABULA COUNTY
GENEVA ON THE LAKE VILLAGE WWTP
OHIO EPA PERMIT 3PC00020
COMPLIANCE EVALUATION INSPECTION

Honorable David Nelson, Mayor
James Hockaday, Village Administrator
Village of Geneva-on-the-Lake
4929 South Warner Drive
Geneva-on-the-Lake, OH 44041

CERTIFIED MAIL

Dear Mayor Nelson and Mr. Hockaday:

On November 3, 2010, a site inspection was conducted at the above referenced facility at 4843 North Broadway (State Route 534), Geneva-on-the-Lake Village, Ashtabula County. The inspection was conducted by John Schmidt of this office. Mr. Vic Quinones, WWTP Superintendent, and James Hockaday, Village Administrator, represented the Village of Geneva-on-the-Lake on the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on June 3, 2009.

The system consists of a emergency retention basin (equalization tank), preliminary treatment consisting of bar screens and manual grit removal, a 20,000 gallon raw sewage pump station, a 415,000 gpd dual-unit contact-stabilization activated sludge treatment process, final settling tanks, chlorine disinfection, and sodium bisulfate dechlorination. Sodium bisulfate is fed for chlorine residual control. Sludge management consists of aerobic digestion and settling tanks, with dewatering on sludge drying beds. Geneva-on-the-Lake has the option of either land application or hauling the sludge to a landfill. Prior to 2009, sludge was land applied to a farmer's field as Class B sludge in Austinburg Township. Since 2009, sludge is hauled to a sanitary landfill in Geneva Township. The facility discharges a sewer along State Route 531 to the east of the plant, which then flows to Lake Erie to the north of the facility. Generators provide backup power to the entire facility. A schematic diagram of the plant is attached.

Ohio EPA understands that the plant has a bypass from the former Imhoff tanks converted into an equalization tank. The bypass is blended with the final effluent prior to Outfall 001. Outfall 001 is located downstream of both the final plant discharge and Outfall 602.

Observations

Following are observations made during the inspection.

1. Influent and effluent monitoring is conducted with a composite sampler that is collecting samples on a time-proportional basis, not the flow-proportional basis as specified by your NPDES permit. We discussed working with your engineering department as well as the suppliers of your flow meters and samplers to make the samplers capable of sampling on a flow-proportional basis. Samplers must have a thermometer in the sampler refrigerator to ensure samples are maintained at the proper temperature.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

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2. Screenings and grit are containerized for disposal at a solid waste landfill.
3. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming. The surface of the clarifier was clear. The effluent trough was clean and there was no scum around the effluent baffle or the trough. Effluent channels and weirs are scrubbed weekly.
4. Ohio EPA still notes issues with the plant maintaining acceptable bacteria levels (F. Coliform) in its final effluent. Ohio EPA notes that the infiltration report, E. Coli treatability status report, and E. Coli treatment feasibility studies required by your NPDES permit have not been submitted as required by your NPDES permit. We discussed current actions by the Village to secure funding for a new disinfection system.
5. The chlorine contact tank has new peristaltic feed pumps for better chlorine control installed the fall of 2009. The configuration of the chlorine contact tanks pose a concern for short circuiting of the flow and not providing the proper disinfection contact time. Per our discussions the Village intends to submit a permit-to-install for an ultraviolet light disinfection system.
6. The WWTP laboratory performs monitoring of pH, temperature, dissolved oxygen, and chlorine residual. Geneva-on-the-Lake contracts with Northcoast Laboratories for BOD, suspended solids, ammonia-nitrogen, phosphorus, metals, oil and grease, nitrate-nitrite, bacteria (F. Coliform and E. Coli), and quality assurance samples from the WWTP laboratory.
7. The final effluent at the outlet to Lake Erie could not be observed due to the outlet being submerged. During the inspection I observed an open manhole at the facility immediately upstream of Outfall 001 and the final discharge appeared to be of acceptable visual quality.

NPDES Permit Compliance Review

The Geneva-on-the-Lake WWTP operates under NPDES Permit 3PC00020*HD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2009 through November 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	1000	1106.08	6/1/2009
001	31616	Fecal Coliform	7D Conc	2000	2417.93	6/8/2009
001	31616	Fecal Coliform	7D Conc	2000	7745.96	6/15/2009
001	31616	Fecal Coliform	7D Conc	2000	2199.63	6/22/2009

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	1000	5664.85	7/1/2009
001	31616	Fecal Coliform	7D Conc	2000	10762.4	7/1/2009
001	31616	Fecal Coliform	7D Conc	2000	7193.33	7/8/2009
001	50060	Chlorine, Total Residual	1D Conc	0.038	.06	7/9/2009
001	31616	Fecal Coliform	7D Conc	2000	2375.87	7/15/2009
001	31616	Fecal Coliform	7D Conc	2000	36476.8	7/22/2009
001	31616	Fecal Coliform	30D Conc	1000	1778.51	8/1/2009
001	31616	Fecal Coliform	7D Conc	2000	2149.60	8/8/2009
001	31616	Fecal Coliform	7D Conc	2000	6626.00	8/15/2009
001	31616	Fecal Coliform	7D Conc	2000	15811.3	9/8/2009
001	31616	Fecal Coliform	7D Conc	2000	12600.	10/1/2009
001	31616	Fecal Coliform	7D Conc	2000	10844.3	10/22/2009
001	00530	Total Suspended Solids	7D Conc	45	47.	1/15/2010
001	00530	Total Suspended Solids	7D Qty	71	77.6208	3/8/2010
001	80082	CBOD 5 day	30D Conc	25	29.	6/1/2010
001	50060	Chlorine, Total Residual	1D Conc	0.038	.06	6/2/2010
001	31616	Fecal Coliform	7D Conc	2000	6300.	6/22/2010
001	00530	Total Suspended Solids	7D Conc	45	76.	7/1/2010
001	00530	Total Suspended Solids	7D Qty	71	100.681	7/1/2010
001	31616	Fecal Coliform	7D Conc	2000	13501.1	7/1/2010
001	31616	Fecal Coliform	7D Conc	2000	8370.78	8/1/2010
001	31616	Fecal Coliform	7D Conc	2000	15336.2	8/8/2010

Ohio EPA notes that the majority of these effluent violations are related to bacteriological sampling for Fecal Coliform, and that this was an issue that Geneva-on-the-Lake has been struggling with for more than two years, as evidenced by previous CEI inspections conducted in 2008 and 2009. A written explanation as to why these exceedences occurred must be provided, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting code violations were noted; however the following reporting frequency violations were noted:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
581	71921	Mercury, Total In Sludge	2/Year	1	0	06/01/2009
581	78465	Molybdenum In Sludge	2/Year	1	0	06/01/2009
001	00530	Total Suspended Solids	2/Week	2	1	11/22/2009
001	00610	Nitrogen, Ammonia NH ₃	2/Week	2	1	11/22/2009
001	80082	CBOD 5 day	2/Week	2	1	11/22/2009
601	00530	Total Suspended Solids	2/Week	2	1	11/22/2009
601	80082	CBOD 5 day	2/Week	2	1	11/22/2009

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A written explanation as to why these exceedences occurred must be provided, along with measures to ensure that they are not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system. Ohio EPA's eDMR support staff can assist you with questions concerning revisions to older reports. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

Ohio EPA notes the following regarding the compliance schedule:

<u>Permit Effective Date</u>	<u>Permit Expiration Date</u>	<u>Schedule Due Date</u>	<u>Completion Date</u>	<u>Event Code</u>	<u>Schedule Type</u>	<u>Schedule Milestone</u>
6/1/2007	5/31/2012	9/1/2007	Unknown	11599	Bypass	Infiltration Report
6/1/2007	5/31/2012	6/1/2008	Unknown	95999	Other	E Coli Status Report
6/1/2007	5/31/2012	12/1/2008	Unknown	20099	Other	Mercury Treatability Report
6/1/2007	5/31/2012	6/1/2009	Unknown	---	Other	E. Coli PTI or Status
6/1/2007	5/31/2012	6/1/2010	Unknown	---	Construction	Complete Construction

During my site visit, we discussed these requirements. It appears from cursory review of the submitted bacteriological information in the eDMR system that Geneva-on-the-Lake will not be able to comply with the proposed limits for E. Coli and low level Mercury. A review of Ohio EPA files finds no records of these compliance milestones of submitted information being completed. These compliance milestones must be completed as soon as possible and the required information submitted to Ohio EPA.

Other Violations

Failure to Designate an Operator of Record - Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class II State Certified Operator as required by OAC 3745-7-02. Although you indicated that you have identified in correspondence with this office that Vic Quinones is your operator of record, no official designation has been received by Ohio EPA Central Office. Ohio EPA's operator of record designation form may be found at http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf. I have attached a copy of the operator of record form to complete and return to Ohio EPA Central Office.

Based upon the inspection findings and the overall compliance record of the facility, Geneva-on-the-Lake Village is considered in **significant noncompliance** with the terms and conditions of its NPDES permit in regards to bacteria for the Geneva-on-the-Lake WWTP, the above items must be addressed.

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Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

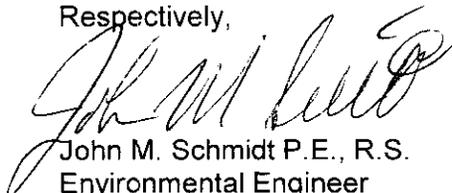
Comments

Ohio EPA offers the following:

Retrieval of Older eDMR Data: During our site visit you indicated that you would like to access electronically previous data submitted through the eDMR system. Some past reports are retrievable through the eDMR system. To bring up older reports you must utilize the search panel on the eDMR submission page. Ohio EPA created the search panel due to user input as they did not like seeing all of their past reports on the screen every time they logged in as it was confusing. So, by default eDMR only shows the past two months reports automatically, anything older you can access but you must first adjust the search criteria to pop them up.....you can click *create new report*, click the *plus* sign next to *search panel*, change the *begin* date from 2010 to the desired year, leave all other search fields blank, and hit *go*, all of the reports between that year and 2010 will pop up and it will be there... eDMR has all of the reports back to October 2007 that the Village can access. If the Village needs reports prior to October 2007, please contact James Roberts at James.Roberts@epa.state.oh.us and he can create them and add them in your account.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

File: Municipal/Geneva-on-the-Lake Village WWTP (Ashtabula Co.)/PC



Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #: _____ STU # _____ Classification: _____

Name of Facility Owner or Permittee, Title (Print) _____ Facility Owner or Permittee (Signature) _____

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	