



**Environmental
Protection Agency**

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

March 15, 2011

RE: ROAMING SHORES VILLAGE WWTP
ROAMING SHORES, ASHTABULA CO.
OHIO EPA PERMIT 3PB000068
COMPLIANCE INSPECTION EVALUATION

Mr. Victor Virmala, Superintendent of Utilities
Village of Roaming Shores
2500 Hayford Road
Roaming Shores, OH 44084

Dear Mr. Virmala:

On March 10, 2010, a site inspection was conducted at the above referenced facility at 2565 Rome Rock Creek Road, Roaming Shores Village, Ashtabula County. The inspection was conducted by John Schmidt of this office. You represented the Village of Roaming Shores on the inspection, and Mr. Mark Venzella of the Ashtabula County Department of Environmental Services (ACDES) accompanied us 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 March 10, 2010.

The system consists of screening and grit removal, comminutor, lift station, equalization basin, aeration tanks, clarification, sand filtration, UV disinfection, and post disinfection aeration. Sludge management consists of aerobic digestion and settling tanks, dewatering with a bio-bag, polymer added to aid dewatering, with sludge removed for off-site disposal in a solid waste disposal facility. The facility discharges to Rock Creek just below the Lake Roaming Rock dam to the northeast side of the facility. Generators provide backup power to the entire facility.

Observations

Following are observations made during the inspection.

1. The Village of Roaming Shores retained its own waste water treatment plant operator, Mr. Virmala commencing in December 2009. ACDES provides backup assistance in the event that Mr. Virmala is away from the facility. Both Mr. Virmala and ACDES personnel are listed as operators of record for this facility.
2. In 2010, the Village obtained a new emergency backup generator from ACDES for use in its collection system in the event of a power failure.
3. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Screenings and grit was containerized for disposal at a solid waste landfill.
4. In August 2010, the Village replaced its existing influent sampler with a new sampler, which was in operation at the time of the inspection. While the physical location of the sampler has been moved to the WWTP building, the physical location of the sample point remains unchanged. The influent sampler is maintained at the proper temperature and collects a flow proportional sample.

5. The 100,000 gallon equalization basin was in use at the time of the inspection and was aerating the wastewater.
6. 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.
7. The surface of the clarifier was clear. The effluent trough was clean and there was no scum around the effluent baffle or the trough in the west clarifier, with only a small amount of scum in the east clarifier.
8. The sand filters were reasonably clean. The effluent discharged to the sand filters during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged. Roaming shores has the ability to bypass the filters during periods of high hydraulic loading.
9. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample.
10. The final effluent discharge from the former chlorine contact tank to Rock Creek was inspected and found to be of an acceptable visual quality. The actual outfall at Rock Creek could not be inspected to muddy side slopes.
11. Equipment has been installed and operational for the dewatering dumpster approved pursuant to PTI No. 659607.
12. The Roaming Shores WWTP laboratory performs monitoring of pH, temperature, and dissolved oxygen. Orwell contracts with Microbac Laboratories of Meadville, PA for remaining parameters.
13. Ohio EPA inquired about any sanitary sewer overflows (SSOs) that roaming Shores experienced in 2010, including waste water plant bypasses and any bypasses in the collection system (sewer and pump station overflows). Mr. Virmala indicated that there were no such events to report for 2010.

NPDES Permit Compliance Review

The Village of Roaming Shores operates the Roaming Shores WWTP under NPDES Permit No. 3PB00068*FD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2010 through February 1, 2011 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:

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	7D Conc	9.0	15.	8/1/2010
001	80082	CBOD 5 day	7D Qty	5.5	5.91141	8/1/2010

A review of Ohio EPA's files finds no explanation as to why these violations occurred. Please provide a written explanation as to why these effluent limit violations occurred, along with measure 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
001	00530	Total Suspended Solids	2/Week	2	1	12/22/2010
001	80082	CBOD 5 day	2/Week	2	1	12/22/2010

Please provide a written explanation as to why the parameter was not collected and analyzed at the frequency prescribed by your NPDES permit. Please note that Ohio EPA expects schedules to be adjusted over holiday periods to ensure that the parameters are collected at the frequencies as prescribed by your NPDES permit. Reporting codes for weekends and holidays may only be used on parameters required to be collected daily.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. 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

Regarding the compliance schedule, Ohio EPA notes the following:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Due Completion Date	Event Code	Schedule Type	Schedule Milestone
3/1/2011	2/29/2016	3/1/2012		95999	Other	E. Coli Status Report
3/1/2011	2/29/2016	6/1/2012		-----	Other	Submit PTI if Needed E Coli
3/1/2011	2/29/2016	3/1/2013		05699	Other	Achieve Final Limits E Coli
3/1/2011	2/29/2016	3/1/2012		-----	Other	Letter No Change Needed Hg
3/1/2011	2/29/2016	3/1/2012		-----	Other	Submit PTI if Needed Hg
3/1/2011	2/29/2016	3/1/2012		-----	Other	Apply for Hg Variance if Needed
3/1/2011	2/29/2016	3/1/2012		-----	Other	Individual Hg Variance if Needed
3/1/2011	2/29/2016	9/1/2011		01299	Other	General Plan for Copper
3/1/2011	2/29/2016	9/1/2011		-----	Other	Submit PTI if Needed Cu
3/1/2011	2/29/2016	Varies		-----	Construction	Commence Construction Cu
3/1/2011	2/29/2016	3/1/2013		05699	Other	Achieve Final Limits Cu

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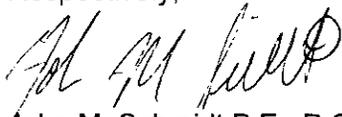
As of the date of this inspection, none of the compliance milestones are due. The Village of Roaming Shores is reminded of its obligations to submit required information by the assigned milestones as prescribed by your NPDES permit.

Based upon the inspection findings and the overall compliance record of the facility, the Village of Roaming Shores is considered to be in substantial compliance with the terms and conditions of its NPDES permit for the Roaming Shores Village WWTP. The above limit and reporting violations should be explained, along with a resolution.

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.

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

cc: Mark Venzella, Ashtabula County Department of Environmental Services

File: Municipal/Roaming Shores Village WWTP (Ashtabula Co.)/PC