

**Environmental
Protection Agency**

Assistant Secretary, Governor
Deputy Secretary, Lt. Governor
Regional Director

August 17, 2011

RE: GREEN CIRCLE GROWERS, INC.
PERMIT NO: 3IN00344
LORAIN COUNTY
CAMDEN TOWNSHIP

Mr. John Van Wingerden
Green Circle Growers, Inc.
15650 St. Rt. 511
Oberlin, Ohio 44074

Dear Mr. Van Wingerden:

On August 4, 2011, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Tom Pippert, Maintenance. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection the following items were noted/discussed:

1. The plant design of the wastewater treatment system is 8,000 gpd.
2. Ms. Carrie Anne M. Rosemark-Langdon, a Class III Wastewater Operator, is no longer contracted to oversee the overall operation of the wastewater treatment plant.
3. Mr. Pippert, a Green Circle Growers employee, is now responsible for the operation and maintenance of the wastewater treatment plant.
4. Mr. Pippert received his Class A wastewater treatment plant operator's license in early 2011.
5. Currently the package plant has been averaging 2,871 gpd since August 1, 2010.
6. The blowers were running and the plant was receiving good aeration.
7. The flow equalization tank was also being aerated.
8. The contents of the aeration tank were light to medium brown in color and no foam was present.
9. The treatment system appeared to be underloaded.
10. The sludge return line was functioning properly and returning light to medium brown water.
11. The skimmer return line was functioning properly and returning clear water. The skimmer level appeared to be set at the proper level.
12. The surface of the settling tank was free of floating solids.
13. The weir in the settling tank was free from scum and solids deposition.
14. No scum was present behind the baffle in the settling tank.

15. Both fixed media clarifiers were in operation.
16. Both surface sand filter beds had vegetation growing in them. The vegetation should be removed immediately. All vegetation should be properly disposed at a licensed solid waste landfill. **It appears that the vegetation in one of the beds may have been sprayed to kill it off. Mr. Pippert indicated that the vegetation in one bed was sprayed with Round-up. The beds should not be sprayed with any type of weed killer since the effluent from the sand filter beds has the potential to discharge into the East Fork of the Vermillion River.**
17. Both dosing pumps were tested and found to be operational. The effluent being pumped into the surface sand filter beds was clear.
18. Both the chlorination and dechlorination dispensing tubes were appropriately stocked.
19. Two lift stations discharge into the wastewater treatment system. Mr. Pippert indicated that the solids holding area prior to each lift station is pumped out approximately every three months.
20. Fred Louis Septic Cleaning is contracted to haul all of the pumped materials to French Creek Wastewater Treatment Plant in North Ridgeville.
21. Mr. Pippert conducts the weekly color, odor, and turbidity readings. He also takes reading for pH and flow. Flow is determined with the use of elapsed time meters.
22. Testing for pH is performed onsite with an electronic ECO Testr pH2 meter.
23. The pH meter is calibrated with buffer solutions of 4.0 and 7.0. The meter was last calibrated on July 22, 2011.
24. Dissolved oxygen is also monitored onsite with a WTW OXI 3150i meter.
25. Effluent samples are analyzed by the City of Norwalk Water Treatment Plant. All sample containers are supplied by the City of Norwalk WTP.
26. All effluent samples are transported in a cooler packed with ice packs.
27. Mr. Dean Palm is responsible for reporting the data to Ohio EPA's electronic discharge monitor reporting (e-DMR) system.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2010 through July 31, 2011 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	6.92	6/1/2011
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.03	.09751	6/1/2011
601	31616	Fecal Coliform	30D Conc	1000	1300.	6/1/2011

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	6.92	6/8/2011
601	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.05	.09751	6/8/2011
601	00400	pH	1D Conc	6.5	6.45	6/14/2011

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt