



Environmental  
Protection Agency

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

April 18, 2011

RE: LAKE COUNTY  
NORTH PERRY  
NEWGREEN LEGACY SERVICES, INC.  
3715 PARMLY ROAD  
NPDES PERMIT NO. 31R00035

Mr. Bruce Geddes  
Radiation Safety Officer  
NewGreen Legacy Services, Inc.  
3715 Parmly Road  
Perry, OH 44081

Dear Mr. Geddes:

On April 7, 2011, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves NewGreen Legacy Services. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. You represented the company during the inspection.

The wastewater treatment plant consists of a former septic tank that has been compartmentalized into a trash trap, sludge holding tank and dosing tank with siphons and a 5,000 gallon Topco extended aeration package plant followed by surface sand filters and chlorination/dechlorination facilities. The wastewater treatment plant treats sanitary sewage only. During the inspection you stated that all floor drains inside the building have been sealed.

At the time of inspection, the plant was producing an effluent with no evidence of foam, debris, oil or grease. The following observations were noted:

- The aeration tank mixed liquor was light brown in color.
- The settling tank content was turbid.
- Filter bed maintenance was unsatisfactory. The beds were full of vegetation. The vegetation and any solids laden filter sand must be removed from the filter bed and disposed in a public landfill. Assurance must be made that 18 inches of Ohio EPA approved sand exists on the filter bed. Ohio EPA approved filter sand has an effective size of 0.4 to 1.0 mm and a uniformity coefficient not greater than 3.0. The sand must be raked and evenly distributed across the filter bed surface.
- The filter distribution box must be repaired.
- Disinfection of the effluent must begin May 1<sup>st</sup> and continue through October 31<sup>st</sup>. Both the chlorination and dechlorination is required.

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A review of the discharge monitoring reports, covering the period August 2009 through February 2011 revealed no effluent limitation violations; however there was excessive use of data substitution codes for discharge flow. The NPDES permit requires flow to be monitored on a daily basis. The discharge monitoring reports for this time period show that flow was reported three times a week and data-substitution codes were used for the remaining days of the week. The excessive use of data substitution codes is a violation of the NPDES permit. Flow must be measured and reported on a daily basis, as required by the NPDES permit.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Pursuant to Ohio Administrative Code 3745-7-09, this agency requires the owner and operator-of-record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. The records must be kept in a bound notebook with pre-printed page numbers. The records shall be housed onsite and shall be accessible for twenty-four hour inspection. The following information must be recorded:

1. Identification of the sewage treatment works;
2. Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
3. Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced;
4. Results of tests performed and samples taken, unless documented on a laboratory sheet;
5. Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced; and
6. Identification of the persons making entries.

Please review the administrative code carefully for information on all requirements. NewGreen Legacy Services must immediately make provisions for onsite operation and maintenance records.

Also, the existing NPDES permit will expire October 31, 2011. Pursuant to Ohio Administrative Code 3745-33-08 an NPDES permit renewal application must be submitted 180 days prior to the expiration of the existing NPDES permit. Failure to do so is a violation of the Ohio Administrative Code. Please immediately submit the renewal application and Antidegradation Addendum.

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Once this office receives a complete NPDES permit application, the permit will be drafted soon after. When the draft permit is public noticed, please review it carefully. A thirty-day comment period will be provided. Any questions, comments or concerns regarding the draft permit must be submitted to this district office in writing.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,

A handwritten signature in cursive script that reads "Marie Underwood".

Marie Underwood, P.E  
Environmental Engineer  
Division of Surface Water

MU/mt

Enclosure- Extended Aeration O&M manual