



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 16, 2009

RE: NORTHFIELD PARK
3IN00314*BD
SUMMIT COUNTY

Mr. Tom Barry
Assistant General Manager
Northfield Park
10705 Northfield Road
P.O. Box 374
Northfield, Ohio 44067

Dear Mr. Barry:

On December 15, 2009 this writer along with John Shaper, Safeguard Environmental conducted an inspection of your facility. Also in attendance was Scott Banham, Northfield Park. The purpose of the inspection was to gather information necessary to renew the above referenced NPDES permit which expires May 31, 2010. Below is a summary of the inspection:

General

Northfield Park is a harness racing track located in Northfield, Summit County. In support of the track, Northfield Park provides numerous barns which the horsemen use and maintain. They are used to house, feed and clean the horses. The individual horsemen are responsible for daily maintenance of the barns which includes manure management and minimizing exposure of horse related waste to stormwater. Washing down the horses along with any related equipment is supposed to occur inside in designated areas which capture the wastewater and direct it to the sanitary collection system.

Sanitary sewers have been installed throughout the barns to collect wash waters and sanitary wastewater. This water is routed to a pump station located at the northeast corner of the property. Collected wastewater is then pumped west under the racetrack to an existing manhole. Stormwater is collected separately between the barns and routed to the east.

Observations

Manure is individually shoveled by the horsemen into wheel barrows and put into steel collection bins located near the front of each barn. Straw/manure/urine from the horse stalls is routinely removed and also deposited in the aforementioned storage bins. The bins are loaded on a truck on a daily basis and hauled to a mushroom farm. Excess

Mr. Tom Barry
Northfield Park
December 16, 2009
Page 2

manure is taken and stored within the manure storage building. Not all the manure related waste is contained, as straw and manure was observed between some of the barns. Reportedly, a street sweeper is employed to routinely clean between the barns to remove this material.

I observed your consultant performing the sampling for outfall 001. It was discovered that the outfall location has changed since our last inspection. The open ditch that used to receive some of the stormwater runoff from the site has been filled. Reportedly, an eighteen inch pipe was installed in the ditch and the sewers collecting stormwater between the barns connected. The outfall listed as 001 in the NPDES permit no longer exists. Sampling is being performed at the exposed inlet of this eighteen inch pipe located just east of the manure building. This location is not a representative point of the stormwater leaving the eastern portion of the property. It does not capture any of the stormwater generated between the barns, which would be the major source of pollutants from the site. It appears to be only capturing the discharge from a swale located on the northern property line.

A new station will have to be located that will monitor the effectiveness of the best management practices plan for the site. This writer will revisit your site in the near future to locate a suitable location. In the meantime, we request that you also evaluate the situation to identify a suitable location. The stormsewer may have to be exposed at a point that captures all your runoff from the east side but before it leaves your property.

Compliance review for May 2006 through October 2009

No numeric violations were detected.

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	Flow Rate	1/Month	1	0	05/01/2006
001	Flow Rate	1/Month	1	0	07/01/2006
001	Total Suspended Solids	1/Quarter	1	0	06/01/2007
001	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	06/01/2007
001	Fecal Coliform	1/Quarter	1	0	06/01/2007
001	Flow Rate	1/Month	1	0	06/01/2007
001	Phosphorus, Total (P)	1/Quarter	1	0	06/01/2007
001	Nitrite Plus Nitrate,	1/Quarter	1	0	06/01/2007
001	Biochemical Oxygen Dem	1/Quarter	1	0	06/01/2007
001	Dissolved Oxygen	1/Quarter	1	0	06/01/2007
001	Organic Nitrogen, Tota	1/Quarter	1	0	06/01/2007

Mr. Tom Barry
Northfield Park
December 16, 2009
Page 3

Mr. Shaper indicated the above listed frequency violations may not be accurate and will be contacting our central office to correct the record.

Your current NPDES permit required that you have a Stormwater Pollution Prevention Plan (SWPPP) for the entire site. Mr. Shaper indicated that there was none. This is a violation of your permit. It was supposed to be put together within 6 months of the effective date of the permit. We request that you submit the SWPPP no later than February 28, 2009.

The stormwater monitoring outfall location will have to be resolved as soon as possible in order to renew the permit. If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/mt

cc: Dave Shaper, P.E., Safeguard Environmental

File: Industrial/Permit Compliance