



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 3, 2010

RE: ASHTABULA COUNTY
HOLIDAY CAMPLANDS
NPDES PERMIT NO. OH0043770
OHIO EPA PERMIT NO. 3PH00029

Mr. Larry Meaney
Ashtabula County Department of Environmental Services
25 West Jefferson Street
Jefferson, OH 44047

Dear Mr. Meaney:

An inspection was conducted by the undersigned of the referenced sanitary wastewater treatment plant on February 3, 2010. Also present were Messrs. Barry French and Mark Verzella. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

Inspection Findings/Compliance Status

The 150,000 gallon/day treatment system consists of a comminutor/bar screen, influent pump station, flow equalization basin, dual-unit extended aeration activated sludge "package" plant, final settling tank, dual-unit tertiary rapid sand filter, chlorination/dechlorination tank, sludge holding, and sludge drying beds. Ferric chloride is used for phosphorus removal. The facility discharges to Gravel Run.

At the time of inspection, the following observations, findings and/or comments were noted:

- The general operation and maintenance of the treatment processes and equipment at the plant appeared to be satisfactory. The facility was producing an effluent of visually-clear quality. There were no visual indications of degradative impacts to Gravel Run.
- We understand that the facility has experienced some infrequent partial bypassing of the sand filters during high flow events, e.g. excessive I/I. As we discussed, Ohio EPA Form 4498 should be used to report any non-compliance that is the result of such **unanticipated bypasses**. The form is available online at: <http://www.epa.ohio.gov/dsw/permits/permits.aspx>.

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A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, January 2008 – January 2010, indicate that the following violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Report Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2009	001	Fecal Coliform	7D Conc	2000	4900.	10/15/2009

Parameter	Units	Date	Reported Value	A Code
Flow Rate	MGD	2/22/2008		AH
Flow Rate	MGD	2/23/2008		AH
Flow Rate	MGD	2/24/2008		AH
Flow Rate	MGD	2/28/2008		AH
Flow Rate	MGD	2/29/2008		AH
Flow Rate	MGD	3/1/2008		AH
Flow Rate	MGD	3/2/2008		AH
Flow Rate	MGD	3/6/2008		AH
Flow Rate	MGD	3/7/2008		AH
Flow Rate	MGD	3/8/2008		AH
Flow Rate	MGD	3/9/2008		AH
Flow Rate	MGD	3/10/2008		AH
Flow Rate	MGD	3/11/2008		AH
Flow Rate	MGD	3/12/2008		AH
Flow Rate	MGD	3/13/2008		AH
Flow Rate	MGD	3/14/2008		AH
Flow Rate	MGD	3/15/2008		AH
Flow Rate	MGD	3/16/2008		AH
Flow Rate	MGD	3/17/2008		AH
Flow Rate	MGD	3/18/2008		AH
Flow Rate	MGD	1/17/2009		AH
Flow Rate	MGD	1/18/2009		AH
Flow Rate	MGD	1/25/2009		AH
Flow Rate	MGD	1/26/2009		AH
Flow Rate	MGD	1/10/2010		AH
Flow Rate	MGD	1/17/2010		AH
Flow Rate	MGD	1/18/2010		AH

In addition to the above, our review noted the following:

- The facility's eDMRs are currently being submitted and certified by Ms. Sharon Welsler. While eDMR allows permitted facilities to enter, electronically sign, and

submit DMRs, federal and state regulations specify who can legally sign and certify the reports. Pursuant to the regulations, DMRs can **only** be signed and certified by an executive County official or by a duly authorized representative of said official. Pursuant to Title 40 Code of Federal Regulations (40 CFR) 122.22 (b):

A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***
- (3) The written authorization is submitted to the Director.***

The Personal Identification Number, or PIN, uniquely identifies and serves as the **electronic signature** of the responsible or duly-authorized official.

Under the eDMR program, the PIN holder can delegate individuals, such as lab personnel, with the privilege to view, create and edit DMRs...but not submit eDMR data. These individuals must have an eBusiness Center account, but do not need a PIN. Since they do not have the privilege of actually certifying the data, the law does not require them to have a PIN. Once these users perform the data entry or review the data, the DMR is saved and the PIN holder can log on and submit the DMR.

Future NPDES Permit Changes

The facility's current NPDES permit will expire on November 30, 2010. Based on recent rule revisions, the following changes will be incorporated into the renewal permit:

- Pursuant to Ohio Administrative Code (OAC) 3745-7, the facility classification will remain as a Class II treatment works. Additionally, the County must provide written notice regarding the name and certification of the designated operator(s) of record for the facility.

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- As of March 15, 2010, the current Fecal Coliform water quality standard will be replaced by an *E. coli* standard. The NPDES permit will include a "Schedule of Compliance" to allow the facility time to achieve compliance with the new requirement.

Summary/Conclusion

Please inform this office, in writing, as to the actions that have been or will be taken to correct the above deficiencies and/or violations. Your response should include the dates that the actions will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

File: Public/Ashtabula County Holiday Camplands/P&C