Environmental Protection Agency

[illegible], Governor
[illegible], Lt. Governor
[illegible], Director

September 8, 2010

RE: GRAND RIVER ACADEMY
OHIO EPA PERMIT 3PT00115
AUSTINBURG TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Randy Blum, Headmaster
Grand River Academy
3042 College Street
Austinburg, OH 44010

Dear Mr. Blum:

On August 31, 2010, a site inspection was conducted at the above referenced facility at 3042 College Street, Austinburg Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. I spoke with Mr. Joel Laughlin, Maintenance Supervisor, during my inspection, but Mr. Laughlin was unable to accompany me during 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, and to follow up on an August 10, 2008, site visit. The last compliance inspection was conducted on December 10, 2008.

The facility consists of two distinct sanitary package wastewater treatment plants, one known as the old plant (East Plant) and the other the new plant (West Plant).

West Plant (New Plant):
The plant receives sanitary wastes from various campus buildings, including dormitories classrooms, and administration areas. The system is rated at 5,000 gpd. The plant consists of a trash trap, flow equalization, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, and ultraviolet disinfection. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publically owned treatment works (POTW). The plant effluent discharges to an unnamed tributary to Coffee Creek located adjacent to the west side of the plant. No backup power is provided to the facility, but the facility is provided with alarms.

East Plant (Old Plant):
The plant receives sanitary wastes from various campus buildings, including dormitories classrooms, and administration areas. The system is rated at 8,000 gpd. The system consists of a trash trap, flow equalization, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publically owned treatment works (POTW). The plant effluent discharges to an unnamed tributary to Coffee Creek located adjacent to the south side of the plant. No backup power is provided to the facility, but the facility is provided with alarms.

Observations
The following observations were made during the inspection.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

West Plant (New Plant – College Street west of Warren Hall)

1. The design flow of the extended aeration plant is 5,000 gallons per day. The aeration tank contents were a dark brown color and had a musty odor. The blowers were not operating at the time of inspection. The blowers were cycled andfound functional. As this plant serves primarily residence halls that are not scheduled to be fully occupied until the week of September 6, 2010, this is typical.

2. A log book of repairs and observations is maintained at the WWTP could not be located during the inspection. Marlene Knopsnider of Lewis Wastewater Management, performs routine operations at the WWTP, monitors the facility, and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. You perform daily inspections of the plant and notify Lewis if there is a problem.

3. Clarifiers were observed clear, with water levels below the effluent weirs. The skimmer and return sludge lines were observed in operational condition, but not operating at the time of the inspection. Effluent weirs were noted as reasonably clean and free of debris.

4. The slow sand filter dosing station pumps were cycled and found in operating condition. The plant was not discharging at the time of the inspection. The wastewater entering the sand filters was observed as clear. The south filter was found as free of vegetation and sludge, but the north filter had an accumulation of vegetation (see pictures). Vegetation must be removed and sand replaced as necessary. Both filters appear recently raked.

5. The ultraviolet disinfection tank was found in need of cleaning (see pictures).

6. The final discharge was not observed due to a lack of flow.

East Plant (Old Plant – Velotta Street south of Sauder Hall)

7. The design flow of the extended aeration plant is 8,000 gallons per day. The aeration tank contents were a chocolate brown color and had a faint earthy odor that is well aerated with no foaming. This is an indication of a properly operating system.

8. A log book of repairs and observations is maintained at the WWTP could not be located during the inspection. Marlene Knopsnider of Lewis Wastewater Management, performs routine operations at the WWTP, monitors the facility, and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. You perform daily inspections of the plant and notify Lewis if there is a problem.

9. Clarifiers were observed clear. The skimmer and return sludge lines were observed in operational condition. Effluent weirs were noted as needing a good cleaning, and should be cleaned weekly to bi-weekly.

10. The slow sand filter dosing station pumps were cycled and found in operating condition. The plant was not discharging at the time of the inspection. The wastewater entering the sand filters was observed as clear. Both filters were found as free of vegetation and sludge, recently raked and reasonably clean.

11. The chlorine contact tank was found stocked with limited chemicals and was providing marginal disinfection for the facility. The dechlorination system was also found stocked with limited chemicals and was providing marginal dechlorination for the facility. Chemicals should be fully stocked in the feed tubes.

12. The final discharge was not observed due to a lack of flow.

NPDES Permit Compliance Review

Grand River Academy operates under Permit 3PT00115*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period December 1, 2008 through August 1, 2010, indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	26.	8/1/2009
001	00530	Total Suspended Solids	7D Conc	18	26.	8/1/2009
001	00530	Total Suspended Solids	1D Qty	0.341	.49205	8/5/2009
001	00530	Total Suspended Solids	7D Qty	0.227	.49205	8/1/2009
002	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.16	3/1/2010
002	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	6.16	3/15/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.16	12/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.0	6.16	12/15/2009
002	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.3	3/1/2009
002	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	6.3	3/8/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	21.28	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.0	21.28	12/15/2008
002	00400	pH	1D Conc	6.5	6.4	6/8/2009

A written explanation as to why these exceedence events occurred must be provided, along with measures to ensure that they are not repeated. 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. E-mailing 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.

Reporting Violations
No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations
No compliance schedule violations were noted for the reporting period reviewed.

Comment
Ohio EPA understands that both of these plants will be abandoned once you are connected to sanitary sewers currently under construction the Austinburg area. Please notify this office once you have connected to sanitary sewers and have abandoned the above onsite treatment facilities, so that an inspection can be conducted by this office. Until your NPDES permits are terminated, you must report to the eDMR system, even if there is no flow from your facility.

Based upon the following information, Grand River Academy is considered in substantial compliance with the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. However, the above items must be addressed.

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 thisinspection, please feel free to contact me at (330) 963-1175.

Respectively,

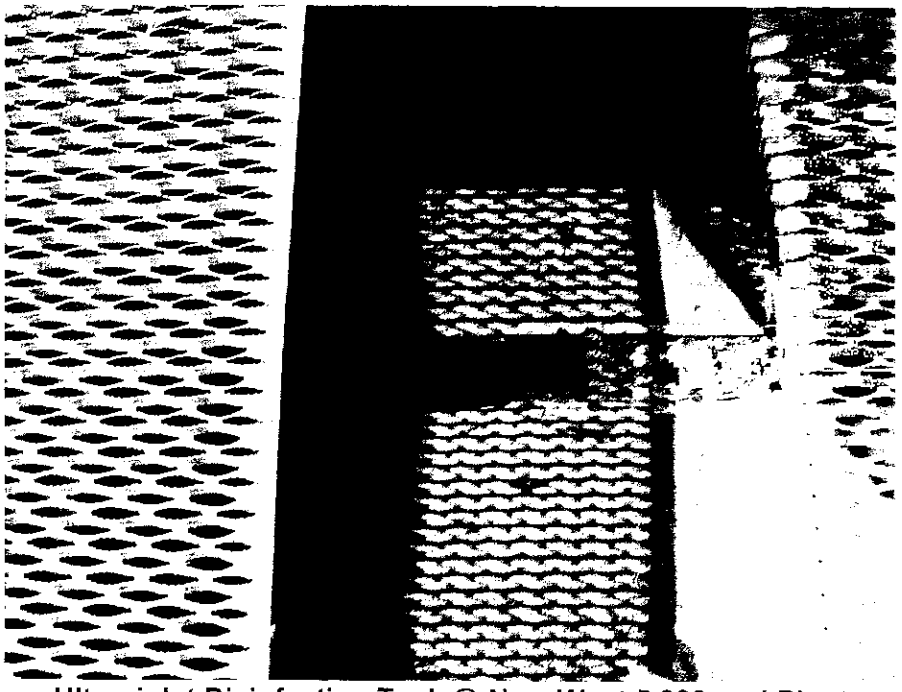
John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS:bo

enclosure(s)

File: SP/Ashtabula/Austinburg Twp/Grand River Academy

North Sand Filter @ New West 5,000 gpd Plant



Ultraviolet Disinfection Tank @ New West 5,000 gpd Plant

Chlorine Disinfection Tank @ Old East 8,000 gpd Plant