



**Environmental
Protection Agency**

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

February 1, 2011

RE: GLENBEIGH HEALTH SERVICES WWTP
NPDES PERMIT NO. 3PT00116
MORGAN TOWNSHIP, ASHTABULA CO.
COMPREHENSIVE EVALUATION INSPECTION

Mr. Tim Phillips, Maintenance Supervisor
Glenbeigh Health Services
P.O. Box 298
Rock Creek, OH 44084-0298

Dear Mr. Phillips:

On January 27, 2011, a site inspection was conducted at the above referenced facility at 2863 State Route 45, Morgan Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you and Mr. Chris Cimino represented Glenbeigh Health Services (Glenbeigh). 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. The last compliance inspection was conducted on January 21, 2010.

The system consists of an influent pump station, trash trap, extended aeration tanks, clarifiers, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the sludge tanks to sludge drying beds. The facility discharges to Badger Run adjacent to the west side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations

Following are observations made during the inspection.

1. The design flow of the extended aeration plant is 20,000 gallons per day. The extended aeration plant operated continuously.
2. The plant is operated by both Mr. Phillips and Mr. Cimino. The plant is visited weekly by Ake Environmental and Construction Services, Inc. (Ake), who performs weekly onsite analyses of pH, dissolved oxygen, temperature, and conductivity, as well as all off-site analysis, and submits the data to the electronic discharge monitoring system (eDMR) on behalf of Glenbeigh Health Services.
3. Influent pump station pumps and surface sand filter dosing pumps were replaced in 2008. The surface sand filters were completely rebuilt in 2010 and include new walls, under drain system, and sand. Return activated sludge (RAS) pumps were repaired in 2010. New clarifier weirs were installed in 2010.

4. The overall condition of the treatment plant during the inspection was satisfactory with the plant well maintained. Trash is removed from the influent pump station trash trap every other month and disposed off-site in a sanitary landfill.
5. The influent pump station pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
6. The aeration blowers were cycled and found in operating condition. The alarms were cycled and found in operating condition.
7. The content of the aeration tank had a good color and mixing. Sludge returns were found in operating condition and were a medium brown color. The aeration system was examined and found to contain some foaming on the surface, occupying about 20% of the aeration tank surface. From discussion with the operators, Glenbeigh sees peaks in influent flows in the morning hours (6-8 AM) and again in the afternoons (4-6 PM). Consideration should be given to providing an equalization basin to equalize flows to the plant and provide a more consistent waste stream for the biological treatment process. Other sources of foaming could include over aeration, organic underloading, or excessive use of surfactants (cleaners), sanitizers, or detergents by institution staff. Sources should be investigated and materials with low phosphates should be substituted.
8. The surface of the clarifier was reasonably clear and the skimmer appeared to be operating as designed. New weirs were found in good condition.
9. The dosing pumps were cycled and found in operating condition. Alarms associated with these pumps were cycled and found in operating condition.
10. Surface sand filters were found clean and operable. The clarifier effluent discharged to the sand filter during the inspection was clear and free of color, odor, and turbidity. The sand in the sand filter was noted as new, as confirmed by wastewater staff.
11. The Chlorination and dechlorination tanks were not in operation and therefore not inspected, due to the time of year. Disinfection and dechlorination is required for this facility between May and October.
12. The final effluent discharge to the tributary north of the wastewater plant was observed to be reasonably clear with a very slight tint of light brown. Based upon the observations of the sand filter influent, this is likely due to fines from the new under drain system and filter sand working out of the sand filters. The effluent was an acceptable visual quality.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2009 through June 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as noted below:

Limit Violations

The following limit violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	10.01	1/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	10.01	1/22/2010
001	00610	Nitrogen, Ammonia (NH3	30D Coc	3.0	4.25	3/1/2010
001	00300	Dissolved Oxygen	1D Coc	6.0	5.7	6/3/2010
001	00610	Nitrogen, Ammonia (NH3	30D onc	1.0	4.88	9/1/2010
001	00300	Dissolved Oxygen	1D onc	6.0	5.2	9/9/2010
001	00610	Nitrogen, Ammonia (NH3	3D Conc	1.0	1.31	10/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.1	10/7/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	10.25	11/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	10.25	11/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	3.4	11/4/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	11/11/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	2.4	11/18/2010

A written explanation as to why these exceedence events occurred must be provided, along with measures to ensure that they are not repeated. Ohio EPA notes that this facility was found in significant noncompliance (SNC) earlier this year for effluent violations of ammonia-nitrogen, and low dissolved oxygen levels remain a concern. Consideration should be given to providing chemical treatment and/or flow equalization to this facility. Mr. Phillips and Mr. Cimino acknowledged that ammonia and dissolved oxygen discharge levels are an ongoing problem, and further indicated that Glenbeigh is open to any recommendations for a low-cost workable solution to the ammonia and dissolved oxygen problems. Other than installation of flow equalization, Ohio EPA DSW's Compliance Assistance Unit (CAU) may be able to assist you in this matter. Please feel free to contact Keith Kroeger at (614) 644-2001 or via email at Keith.Kroeger@epa.state.oh.us. if you would like assistance from Ohio EPA DSW CAU.

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. Emailing 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.

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Reporting Violations

No reporting code or reporting frequency violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed. There is no compliance schedule in your existing NPDES permit.

Based upon the inspection findings and the overall compliance record of the facility, the facility is considered to be in substantial compliance; however the above issues must be addressed. Ohio EPA will continue monitoring this facility regarding its compliance status during the warmer months of 2011. Glenbeigh must ensure that this facility does not enter significant noncompliance again in 2011.

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 this notification, 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/mt

File: SP/Ashtabula Co./Morgan Twp/Glenbeigh Health Services