



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Koriesski, Director

June 23, 2010

RE: GREAT LAKES MEDIEVAL FAIRE
OHIO EPA PERMIT 3PR00457
TRUMBULL TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Larry Rickard, Owner
Great Lakes Medieval Faire
P.O. Box 376
Rock Creek, Ohio 44084

Dear Mr. Rickard:

On June 8, 2010, a site inspection was conducted at the above referenced facility at 3033 State Route 534, Trumbull Township, Ashtabula County. The inspection was conducted by John Schmidt of this office and Terry Palmer of the Ashtabula County Health Department. Representatives of the Great Lakes Medieval Faire (GLMF) were not present 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. The last compliance inspection was conducted on July 8, 2008.

The system consists of an extended aeration system with clarifier, slow surface sand filtration, and chlorine disinfection. Sludge removal is from an aerated sludge holding tank when needed to another POTW. The facility discharges to Trumbull Creek adjacent to the north side of the facility. No backup power is provided to the facility, and the facility has no alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 11,000 gallons per day. The plant was not operating at the time of the inspection.
2. Although it appears that power is provided to the plant, a rodent nest was located inside the control panel (please see attached picture).
3. The content of the aeration tank had a slight septic odor and was a light grey color with no mixing. The blowers were not running and the plant was not receiving any aeration. A medium brown color is more typical for the aeration tank. The area around the aeration tank had weeds in excess of four feet (see attached picture).

4. The surface of the clarifier was clear, but had no water going through it. Effluent weirs need cleaning.
5. Rapid sand filters were overgrown with weeds, and had no flow through them. No sludge was visible on the filter. Accumulated debris should be removed. No discharge to the sand filters was observed during the inspection.
6. The final discharge at Trumbull Creek was observed as not flowing.
7. According to Ohio EPA's records, Mark Lewis of Lewis Wastewater Management, Inc. is your operator of record. Mr. Lewis passed away on February 16, 2010. Contact with Dustin Lewis of Lewis indicates that there is no contract between Lewis and GLMF. GLMF must obtain the services of a licensed "Class A" WWTP Operator or higher to operate the plant and report required data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

NPDES Permit Compliance Review

Great Lakes Medieval Faire operates under Permit 3PR00457*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2008 through May 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

No violations were noted for the period reviewed.

Reporting Violations

No reporting violations were noted for the period reviewed; however it was noted that no flow data was reported in 2009 or so far in 2010. Flow is reported as "AL" for "no flow" from the WWTP between January 1 and June 30 of each year, and from October 1 through December 31 each year, reflecting times when the facility is not used. For the operating period of June-October of each year, flow rates were reported for 2008, and reporting codes "AC", "AH", and "AN" used in 2009.

Ohio EPA notes that GLMF offices are staffed with personnel and contractors that have access to permanent restroom facilities in buildings. Please provide a rationale for the use of the "AC", "AH", and "AN" codes for 2009.

Compliance Schedule Violations

Based upon a review of Ohio EPA's files, the following is a compliance schedule summary as specified by your permit:

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| Permit Effective Date | Permit Expiration Date | Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone |
|-----------------------|------------------------|-------------------|-----------------|------------|---------------|-------------------------|
| 02/01/2008 | 01/31/2013 | 05/01/2009 | Not Submitted | 01299 | Construction | WWTP Effectiveness Eval |

From examination of Ohio EPA's files, Ohio EPA has no record of receiving a report on the evaluation of the effectiveness of the treatment system and an assessment of the capability of the system to meet the final effluent limitations. As most of the data submitted to the e-DMR indicates reporting codes denoting that the plant was not discharging, it is unclear to Ohio EPA if the plant has achieved its operational level as specified by your NPDES permit.

Please provide Ohio EPA a letter stating that the existing system can meet the final limits supported by data or submit a permit-to-install application for the necessary improvements as prescribed by your NPDES permit.

Other Violations

1. Failure to Contract with a Licensed Wastewater Plant Operator - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. GLMF may enter into a contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation thereof provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. Your current operator of record is deceased, and it appears that there is no contract between GLMF and Lewis. For your reference, I have attached a list of certified contract operators.

Please provide evidence that you have contracted with an appropriately certified operator to operate your WWTP.

2. Failure to Maintain Sanitary WWTP [OAC 3745-7-09, Permit Part III, Item 3]: GLMF has failed to maintain its Sanitary WWTP. From the attached pictures, it is apparent that the WWTP has not operated for some time.

GLMF must evaluate the system as soon as possible and make immediate repairs as necessary to ensure that components of the sanitary WWTP are properly operating; including blowers, aeration system, sand filters, and disinfection system. Vegetative overgrowth and the rodent nest must be removed.

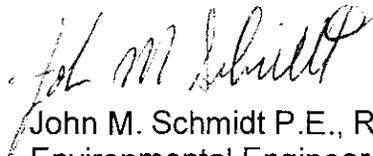
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Ohio EPA will conduct a follow up inspection of your WWWTTP prior to commencement of your fair in July. Please be advised that failure to submit accurate DMRs, failure to comply with the compliance schedule prescribed in your NPDES permit, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. Based on the above information, Great Lakes Medieval Faire is considered to be in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office, in writing, within 14 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 inspection, 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

Att: List of Contract Water and Wastewater Operators, revised May 24, 2010

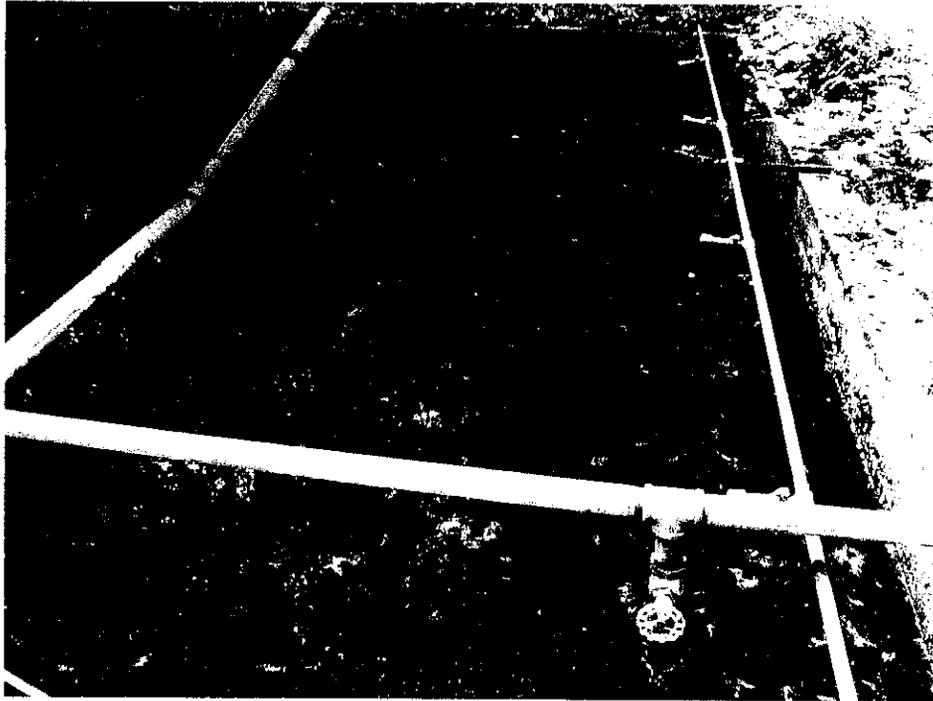
File: Great Lakes Medieval Faire (Trumbull Twp) Ashtabula Co./Semipublic P/C



Rodent Nest in WWTP Electrical Panel



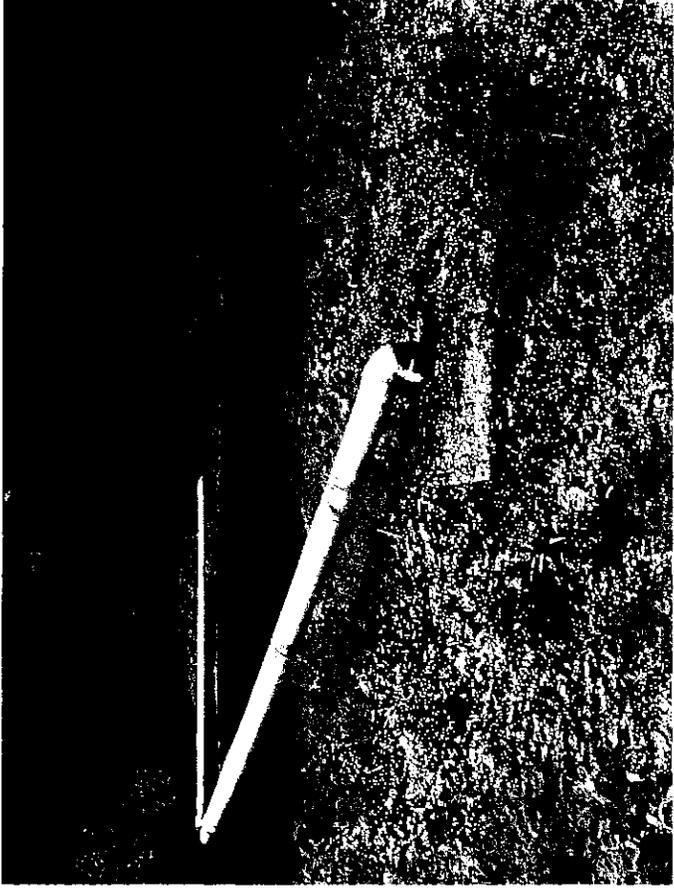
WWTP Overgrown with Vegetation



Extended Aeration System without Aeration



Sand Filter with Vegetation



Sand Filters with Vegetation



Chlorination Tank (Dry)



Final Discharge to Trumbull Creek



List of Contract Water and Wastewater Operators

The following is a list on contract operators who are available to perform the services of the "operator of record" at public water systems and/or treatment works within Ohio. This is not a comprehensive list and inclusion on this list does not constitute an endorsement by the Ohio EPA. This information is provided as a resource for the purpose of convenience.

If you would like to be added to this list, please contact the Ohio EPA Operator Certification Unit at 1 (866) 411-OPCT(6728).

(WS= Water Supply, WD = Water Distribution, WW = Wasterwater Treatment and WC = Wastewater Collection)

| Name of Company | Contact Name | Phone Number | Fax Number | e-mail address | Services Available | Ohio EPA District or Counties of Service | Number of Certified Operators |
|--|-------------------|--------------|--------------|--|--------------------|--|-------------------------------|
| McGhee's Technical Water Service | Holly McGhee | 419-886-4716 | 419-886-4716 | Mtwisi@aol.com | WS, WD, WW and WC | CDO, NEDO and NWDO | 6 |
| B & J Environmental, Inc. | Josh Goodridge | 440-537-5329 | 740-296-5052 | jgoodridge312@comcast.net | WS, WD, WW and WC | Ashtabula, Belmont, Columbiana, Cuyahoga, Fairfield, Franklin, Geauga, Guernsey, Jefferson, Lake, Licking, Mahoning, Monroe, Muskingham, Portage, Stark, Summit and Trumbull | 7 |
| Uni-Tech Environmental Services, Inc. | Christina Douglas | 419-357-2688 | 419-668-6823 | christinadouglas@neo.rr.com | WS, WD, WW and WC | NEDO and NWDO | 3 |
| Aquaguard | Ron Bell | 440-352-4874 | | bosstone@sbcglobal.net | WS | Ashtabula, Cuyahoga, Geauga and Lake | 1 |
| Environmental Engineering Service | Frank Leone | 513-934-1512 | 513-934-1515 | fleone@enveng.com | WS, WD, WW and WC | CDO, SEDO and SWDO | 5 |
| E. Wayne Grigsby Water & Wastewater Consultant | Wayne Grigsby | 740-703-5180 | 740-774-1223 | waynewwtp@horizonview.net | WS, WW | SEDO | 1 |



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| Joseph Hickman & Associates, Inc. | Joe Hickman | 740-814-7342 | 740-587-2348 | jrh.inc@gmail.com | WS, WW | Delaware, Licking and Franklin | 6 |
| Chris Huebner | Chris Huebner | 740-255-6385 | 740-452-4257 | thuebner@columbus.rr.com | WS, WD, WW and WC | Coshocton, Guernsey, Liking, Morgan, Muskingham and Perry | 1 |
| William Ward | William Ward | 330-332-9727 | | piperwings@aol.com | WS and WD | Carroll, Columbiana, Mahoning and Stark | 1 |
| N-CO Environmental Services | Nathan Coey | 740-817-2121 | | ncoenviro@gmail.com | WW, WC | Ashland, Delaware, Franklin, Knox, Licking and Marion | 1 |
| Hanes Environmental, Inc. | Larry Hanes | 419-845-3549 | 419-845-3549 | hanesenviro@aol.com | WW, WC | CDO and NWDO | 2 |
| Brandon Fox | Brandon Fox | 740-468-3173 | | mbfox@columbus.rr.com | WS, WD, WW and WC | Fairfield, Franklin, Licking, Muskingum and Perry | 1 |
| | Jeff Morrison | 614-873-1888 | 740-349-1517 | jeff43064@peoplepc.com | WS, WD, WW and WC | Franklin, Madison and Union | 1 |



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| Kimball Contruccion LLC | Jesse Kimball | 513-796-2630 | 513-796-2631 | jkcase1570@yahoo.com | WS and WD | Butler, Darke, Montgomery and Preble | 1 |
| Ralph E. Mohr CMIYC, LLC | Ralph E. Mohr | 740-373-8615 | 740-373-8615 | remohr41@sbcglobal.net | WS,WD, WW and WC | SEDO | 1 |
| Protech Water System's Inc. | Ben Sommers | 330-495-0093 | | | Class A WS | Portage, Stark, Summit and Wayne | 1 |
| Schultz Environmental Consulting | Brian Schultz | 937-489-2200 | | btims2@yahoo.com | WW | NWDO and SWDO | 1 |
| Patrick Hickman & Associates | Pat Hickman | 614-873-4190 | 614-873-5784 | pathickman290@msn.com | WS, WD, WW and WC | Deleware, Franklin (Western), Madison and Union | 2 |
| Winelco, Inc. | Andy Griner | 513-755-8050 | 513-755-8029 | andygriner@winelco.com | WS, WD, WW and WC | CDO, SEDO and SWDO | 8 |
| | Rick Verhotz | 740-216-6367 | 740-380-2742 | maxim75@hotmail.com | WW and WC | SEDO | 1 |
| Clear Water Management Services | Tom Bouts | 740-983-4087 | 740-983-4087 | tlbouts@aol.com | WS,WD, WW and WC | SEDO, CDO | 1 |



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|--------------------------------------|-----------------|------------------------------|--------------|--|--------------------|---|-------------------------------|
| FLOWCARE | Jim Bennet | 740-969-3540 | 740-969-3867 | flowcarews@yahoo.com | WS, WD, WW and WC | SEDO, SWDO and CDO | 1 |
| H ₂ O - Technologies, LLC | William Newsome | 740-389-4514 740-361-0698 | 740-389-4587 | water.tech@verizon.net | WS, WD, WW and WC | NEDO, NWDO, SEDO and SWDO | 1 |
| Chem-Tech Consultants, Inc. | Gary Hoam | 419-886-4375 | 419-886-4062 | chemtech@chemtech1.com | WS, WD, WW and WC | CDO, NEDO, NWDO and SEDO | 2 |
| | Randy Whited | 330-256-1221 | | rwhited@norton.summit.k12.oh.us | WS and WD | Portage, Stark, Summit and Wayne | 1 |
| Adams & Sons Pump Service Inc. | Tom Reasoner | 330-491-1006 | 330-491-1007 | h20ohio@sbcglobal.net | WS | Carroll, Stark, Summit, Tuscarawas am Wayne | 1 |
| | John Ware | 513-479-7271 | | jlware04@fuse.net | WS | SWDO | 1 |
| | Jeff Garland | 937-533-6227 | | jgarland1965@embarqmail.com | WS, WD, WW and WC | Darke and Preble | 1 |
| | Keith O'Dell | 937-544-7369 | | rkodell@bright.net | WS and WW | SEDO and SWDO | 1 |



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| Analytical Associates Titan Laboratories | Monte J. Edwards | 740-886-7563 | 740-867-5684 | monteedwards@analyticalassociatesititanlabs.com | WW | CDO, NEDO, NWDO, SEDO and SWDO | 1 |
| | Robert Furderer | 937-291-0514 | | mismuir9000@att.net | WS, WD, WW and WC | SWDO | 1 |
| JG Environmental, Inc. | Jennifer Jenkins | 330-668-1356 330-606-9249 | 330-668-1356 | jgenvironmental@yahoo.com | WS and WD | NEDO: Cuyahoga, Medina, Portage, Stark and Summit | 1 |
| Kopp Water Service | Wayne Kopp | 937-448-6512 | | kopp@core.com | WS and WD | CDO, NWDO and SWDO | 1 |
| Jeff's Water Services | Jeffery Szczech | 330-949-3597 | | clhs@sssnet.com | WS | Holmes, Portage, Stark, Summit, Tuscarawas and Wayne | 1 |
| Crown Solutions Co. | Michael Giffen | 937-890-4075 | 937-890-9925 | mike.giffen@veoliawater.com | WW | CDO, SEDO, SWDO, NEDO and NWDO | 8 |
| Krejny Environmental Solutions, LLC | Kevin Krejny | 937-643-3310 | 937-849-4639 | ktkrejny@gmail.com | WS and WW | CDO, SWDO | 1 |
| | Zach Martin | 330-268-0133 | 330-244-0794 | zmartin2@neo.rr.com | WS and WD | Portage, Stark and Summit | 1 |



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|---|---------------|--------------|--------------|--|--------------------|--|-------------------------------|
| William Wills | William Wills | 740-207-1769 | | victor26700@yahoo.com | WS | Fairfield, Muskingum, Perry | 1 |
| Aqua Coach Services | Jessi Elson | 419-630-7374 | | Coach.Elson@yahoo.com | WS and WD | NWDO | 2 |
| AKE Environmental and Construction Services, Inc. | Nicole Dalton | 440-232-0042 | 440-232-0155 | nicole@akelab.com | WS, WD, WW and WC | Ashland, Ashtabula, Cuyahoga, Erie, Geauga, Huron, Lake, Lorain, Medina, Ottawa, Sandusky, Stark, Summit, Trumbull and Wayne | 2 |
| United Water | Jim Perron | 317-637-6337 | 317-637-6282 | | WS, WD, WW and WC | CDO, NEDO, NWDO, SEDO and SWDO | 10 |