

**Environmental
Protection Agency**

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

May 5, 2011

RE: PYMATUNING VALLEY RESORT
OHIO EPA PERMIT 3PR00199
WILLIAMSFIELD TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Ms. Michelle Holt, Manager
Pymatuning Valley Resort
7652 South Pymatuning Lake Road
Williamsfield, Ohio 44093

Dear Ms. Holt:

On April 28, 2011, a site inspection was conducted at the above referenced facility at 7652 South Pymatuning Lake Road, Williamsfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you, and Mr. Robert (Gus) Holt represented Pymatuning Valley Resort 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 April 21, 2010.

Several wastewater streams are collected in the WWTP onsite sewerage system, including backwash from two pools, concession areas, bathhouses, and individual lots for transient and seasonal campers. The wastewater treatment system consists of a trash trap, aerated equalization tank, extended aeration system with clarifier, wet well/lift station, dosing chamber, slow surface sand filtration, chlorine disinfection, dechlorination, another lift station, final polishing pond, and a metering chamber with flow totalizer. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to sludge drying beds. Dried sludge is placed into a dumpster for disposal off-site at the Geneva Landfill. The facility discharges to an unnamed tributary to Pymatuning Lake (Shenango River) east of the facility. No backup power is provided to the facility, and the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 11,500 gallons per day. The plant operates continuously, dosing the sand filters as flow dictates. The plant was not discharging to the sand filters and was not discharging at the time of the inspection.
2. The collection system for this WWTP consists of gravity sewers and a pump station. The pump station appears to be in working order at the time of the inspection. No changes to the collection system were noted from the 2010 compliance inspection.
3. The plant is operated by Roger Osborne of Lewis Wastewater Services under contract to Security First Capital, Ltd.
4. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.

5. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained.
6. The content of the sludge holding tank was typical, and was receiving sufficient aeration. Sludge was removed from the facility in 2010.
7. Collected trash was containerized for disposal at a solid waste landfill. Trash traps are cleaned approximately twice a year.
8. The content of the aeration tank had no odor and light brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. Blowers were recently serviced, with new motors installed in 2010. The color and odor observed is an indicator that the plant is under-loaded, typical for this time of year. A good operating plant should have chocolate brown colored mixed liquor and aeration tank contents. The alarms were tested and found in operating condition.
9. The clarifier surface was clear. Effluent channels and weirs were reasonably clean. Both the sludge return lines and skimmer were operating properly at the time of the inspection.
10. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
11. Surface sand filters need to be cleaned of accumulated leaves and debris from the winter. The east filter contained sludge and weeds, which must be removed. Filter media was replaced in 2009. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged. Debris removed from previous sand filter cleanings was placed along the south side of the filters. This material must be placed into a dumpster for off-site disposal. The walls of the sand filter need to be grouted and sealed.
12. Chlorination and dechlorination systems were installed, but not operating at the time of the inspection. This is typical as the inspection occurred outside of the disinfection season. The tanks should be cleaned and prepared with chemicals for the start of the disinfection season which starts on May 1.
13. The pumps for the dosing tank to the pond were cycled and found in operating condition.
14. The finishing pond had a significant accumulation of duckweed that could affect the quality of the final effluent.
15. The final discharge pipe at the tributary to Pymatuning Lake was observed as clear.
16. Roger Osborne and Dustin Lewis of Lewis Wastewater Management and Clean Streams monitor and perform the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Mr. Holt, who is currently

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taking courses to become a Class A operator, performs routine maintenance on the WWTP under the direction of Mr. Lewis. An examination of Ohio EPA files indicates that Dustin Lewis is the official operator or record for your WWTP.

NPDES Permit Compliance Review

Security First Capital, Limited operates the Pymatuning Valley Resort wastewater treatment works under Permit 3PR00199*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2010 through March 1, 2011 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 reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	5.88	8/1/2010
001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	5.88	8/25/2010

Effluent limit violations must be explained, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting frequency violations were noted; however the following reporting code violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform			AK	8/25/2010

Please provide a rationale as to why these parameters were not reported at the required frequency.

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.

Compliance Schedule

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
10/01/2010	09/30/2015	10/01/2011		95999	Report	E Coli Status Report
10/01/2010	09/30/2015	10/01/2011		----	Other	E Coli PTI if needed
10/01/2010	09/30/2015	10/01/2011		----	Other	Achieve effluent Limits

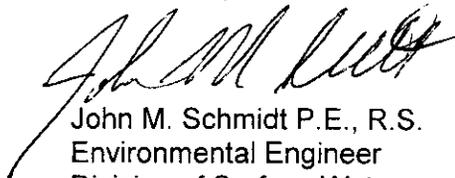
As these milestones have not been reached; no response if needed at this time.

Based on the above information, Security first Capital, Ltd. is considered to be in substantial compliance with the terms and conditions of the NPDES permit for its Pymatuning Valley Resort wastewater treatment facility. 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 that 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

cc: Dustin Lewis, Lewis Wastewater Management
Roger Osborne, P.O. Box 284, Kingsville, OH 44048

File: SP/Ashtabula/Williamsfield Twp./Pymatuning Valley Resort (3PR00199)