

**Environmental  
Protection Agency**

Timothy J. Meyer, Governor  
Lee Fisher, Lt. Governor  
Chris Koneski, Director

April 29, 2010

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

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

Dear Ms. Holt:

On April 21, 2010, 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 September 24, 2007.

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 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 content of the aeration tank had a slight musty 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. 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 a slightly earthy odor.
3. The surface of the clarifier was clear with scum directed to the skimmer. Some scum balls were noted floating on the surface, and should be removed. Effluent channels and weirs could use a good cleaning. Both the sludge return lines and skimmer were operating properly at the time of the inspection.

4. One of the slow sand filters were recently refilled with sand, and both were clean and operable. Consideration should be given to installing additional energy dissipation where the dosing pipe discharges to the filter bed. The dosing pumps discharge to the filters when enough water accumulates to pump. No discharge to the sand filters was observed during the inspection.
5. Chlorination and dechlorination systems were installed, but not operating at the time of the inspection.
6. The finishing pond had a significant accumulation of duckweed that could affect the quality of the final effluent.
7. The final discharge pipe at the tributary to Pymatuning Lake was observed as clear.
8. Dustin Lewis of Clean Streams monitors and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Mr. Holt, who is currently 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**

The Ashtabula County Joint Vocation School operates under Permit 3PT00029\*ED. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2007 through March 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 reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	1D Conc	18	95.	1/24/2008
001	00530	Total Suspended Solids	30D Conc	12	95.	1/1/2008
001	00530	Total Suspended Solids	1D Qty	0.78	1.33043	1/24/2008
001	00530	Total Suspended Solids	30D Qty	0.52	1.33043	1/1/2008
001	00610	Nitrogen, Amm (NH3	30D Conc	3.0	3.92	1/1/2008
001	00610	Nitrogen, Amm (NH3	1D Conc	1.5	24.64	9/4/2007
001	00610	Nitrogen, Amm (NH3	30D Conc	1.0	24.64	9/1/2007
001	00610	Nitrogen, Amm (NH3	1D Conc	4.5	9.94	12/3/2009
001	00610	Nitrogen, Amm (NH3	30D Conc	3.0	9.94	12/1/2009

Please provide a rationale of why these permit limits were exceeded.

#### **Reporting Violations**

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

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50060	Chlorine, Total Residu	1/2 weeks	1	0	09/15/2007
001	50060	Chlorine, Total Residu	1/2 weeks	1	0	10/15/2007

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

Compliance Schedule Violations

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

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
08/01/2005	7/31/2010	02/01/2006	02/15/2006	---	Report	Submit detail I/I Report

As the milestone was not attained by the date specified in your permit, you are in violation of the compliance schedule. It is unclear to Ohio EPA if Pymatuning Valley Resort implemented the recommendations made by the consulting engineer in the February 15, 2006 report. Please provide documentation that the report recommendations were implemented in a summary report.

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](mailto: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.

Other Violations

1. Direct Discharge of Pool Water to Waters of the State – During the inspection, you indicated that while backwash waters from two of the pools are collected and treated at your WWTP, the backwash from the water sports area south of the main entrance is discharged to a ditch to the south of your property. Backwash water must be collected and discharged to your collection system, perhaps at the lift station adjacent to your water sports building. At the end of the season, pool water may be directly discharged only if records are maintained indicating that chlorine residuals are below the limits specified in your NPDES permit.
2. Failure to Renew your NPDES Permit: The Pymatuning Valley Resort operates under Permit 3PR00199\*BD, which will expire on July 31, 2010. Pymatuning Valley Resort was notified in the fall of 2009 that a renewal application was due to Ohio EPA no later than January 31, 2010. To date, no application has been received. During the inspection, you indicated that the application was pending with your operator, Clean Streams.

**A renewal application must be completed along with associated fees, and submitted to Ohio EPA Northeast District Office as soon as possible.**

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Other Comments

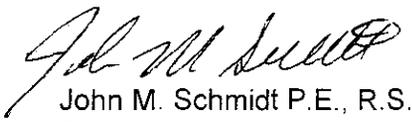
1. Modifications to Your WWTP – During the inspection, you indicated a desire to remove the polishing pond as a component of your WWTP and to modify the pond so that it becomes a sedimentation pond for collection of storm water runoff from your facility. This would require piping the dechlorination effluent to the flow totalizer chamber and bypassing the polishing pond. Such an activity would be considered a modification to your WWTP and will require a permit-to-install (PTI). Other improvements you indicated such as converting from chlorination/dechlorination to ultraviolet as a disinfection method would also require a modification PTI application. Ohio EPA recommends you contact a professional engineering firm specializing in wastewater plant design to assist you with the PTI application and preparation of engineering plans.
2. Storm Water Controls – Storm water currently flows past the plant in a recently constructed channel for discharge to the tributary to Pymatuning Lake with no sediment traps or sedimentation control structures. The conversion of the polishing pond to a sedimentation pond would require modification of your facility's storm water pollution prevention plan (SWPPP) if one exists for this facility. Ohio EPA recommends you contact a professional engineering firm specializing in storm water design to assist you with the preparation of engineering plans and modifications to the SWPPP document. Modifications to the polishing pond as a storm water control structure could be incorporated into the PTI application to modify the WWTP described above.

Based on the above information, Pymatuning Valley Resort is considered to be in substantial compliance with the terms and conditions of the 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 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

File: Pymatuning Valley Resort (Williamsfield Twp) Ashtabula Co./Semipublic P/C