

**Environmental
Protection Agency**

[Type text] Governor
Lt. Governor
Director

September 9, 2011

RE: GRAND VALLEY COUNTRY MANOR
OHIO EPA PERMIT NO. 3PR00232
WINDSOR TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. John W. Odegard, Owner
Grand Valley Country Manor
P.O. Box 156
Geneva, OH 44041

Dear Mr. Odegard:

On August 12, 2011, a site inspection was conducted at the above referenced facility at 5165 U.S. Route 322, Windsor Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody was available from Grand Valley Country Manor 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 August 31, 2010.

The facility appears closed, and newspaper articles indicate that the facility closed in 2009. On January 31, 2011, Mark Hockran of Spieth Realty contacted Ohio EPA on your behalf about a potential split and sale of the property. Ohio EPA responded with a February 1, 2011, letter detailing the requirements of evaluating the site for a future change in use and transfer of the NPDES permit.

Observations

The following observations were made during the inspection:

1. The design flow of the extended aeration plant is 20,000 gallons per day. Currently, it appears that Grand Valley Country Manor is no longer in operation. The plant has power but was shut off at the time of the inspection.
2. A log book was located in the control panel, and appears to have been last used in 2008.
3. The flow equalization tank contained water to keep the tank from floating. The flow equalization pumps were in the off position. The pumps and alarms were cycled and found in operating condition.
4. The aeration tank contained water to keep the tank from floating. The aeration tank blowers were on the off position. The blowers and alarms were cycled, with Blower No. 1 found operable and Blower 2 found inoperable. The source of the malfunctioning equipment should be investigated and repaired as soon as possible.
5. The surface of the clarifier was clear. Effluent channels and weirs were reasonably clean.

6. The sludge return lines were cycled and found operating properly at the time of the inspection. The skimmer was activated and found in operable condition at the time of the inspection.
7. The surface sand filter dosing pumps would not operate when cycled. This should be corrected immediately.
8. Surface sand filters appear to have not been used in some time. The sand filters contained weeds and must be cleaned and raked. No discharge to the sand filters was observed during the inspection.
9. Chlorination and dechlorination systems were installed, but not operating at the time of the inspection. There was only one partially dissolved chlorine tablet in the chlorine contact tank and no chemicals in the dechlorination tank.
10. The final discharge was not observed due to a lack of flow.
11. Data for the period August 2010 through November 2010 was reported to Ohio EPA's eDMR system by Lewis Wastewater Management / Clean Streams on behalf of Grand Valley Country Manor. Clean Streams / Lewis Wastewater Management is not listed as the operator of record for this facility.
12. Ohio EPA records reflect that sludge has not been removed from this facility.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period August 1, 2011 through July 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations and Compliance Schedule Violations

No limit violations or compliance schedule violations were noted for the period reviewed.

Reporting Violations

Ohio EPA notes that Lewis Wastewater Services / Clean Streams reported data on your behalf from August 1, 2010, through November 30, 2010. No additional data had been reported since November 2010. The eDMR reports must be completed each month, even if only to report no flow from this facility. A written explanation as to why these frequency violation events occurred must be provided, along with measures to ensure that they are not repeated.

Other Violations

1. **Failure to Submit all Data Required by your Discharge Monitoring Reports** - Pursuant to Part III, Item 4 of your NPDES permit, Grand Valley Country Manor is required to submit the required Discharge Monitoring Report (DMR) data for all parameters as prescribed by your NPDES permit. Ohio EPA has not received any data since November 2010. Data reporting is required even if there is no flow from the facility.

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If you need assistance in establishing an eDMR account for this facility to submit the required data electronically to Ohio EPA, please go to <http://epa.ohio.gov/dsw/edmr/eDMR.aspx>. Ohio EPA's eDMR support staff may also be available to assist you in this matter. You can e-mail questions to James.Roberts@epa.state.oh.us, this is the quickest way to get a response if you have a specific question with the eDMR program.

Please provide evidence that you have submitted the missing eDMR information or provide a rationale as to why the required information has not been submitted.

2. Failure to Contract with a Licensed Wastewater Plant Operator – Your NPDES permit requires that your wastewater treatment works must be under the supervision of a Class I State Certified Operator. Grand Valley Country Manor must formally notify Ohio EPA of its designated operator of record. Necessary forms for doing this may be found on the web at <http://epa.ohio.gov/dsw/opcert/opcert.aspx>. Please note that Ohio rules (Ohio Administrative Code 3745-7-04) obligate the operator of record to inspect and maintain the facility three times weekly for a total of 1.5 hours, as well as being available to respond to any emergencies if and when they arise. To-date, Ohio EPA has not received a contract with an appropriately certified operator.

Please provide evidence that you have contracted with an appropriately certified operator to operate your WWTP and notified Ohio EPA central office of the operator of record.

3. Failure to Accurately Report Information on the eDMR - Ohio EPA finds it interesting that the flow for this facility has been consistently reported as 150 gpd (0.00015 MGD) through at least the end of November 2010 when the facility has been closed since 2009. Please provide a rationale for this discrepancy.
4. Failure to Notify a Change in Ownership – Ohio EPA notes that the property has been sold from Windsor estates Realty, Ltd to John W. Odegard. The Ohio EPA notified you of this via letter on February 1, 2011. Pursuant to Part III, Item 19 of the NPDES permit for this facility, Windsor Estates Realty, Ltd was supposed to notify the succeeding owner (John W Odegard) of the existence of this permit by letter and provide Ohio EPA a copy of this letter; and provide Ohio EPA with a written agreement between the parties acknowledging the date that liabilities for compliance will be assumed by the new owner. A transfer of ownership notification is needed to transfer the permit to any future perspective owner. A transfer of ownership form must be completed and returned to Ohio EPA. The form may be found on the web at: http://epa.ohio.gov/portals/35/permits/NPDESTransferForm_fis.pdf.

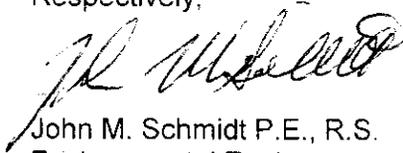
It is imperative that you comply with your NPDES permit. Frequency violations continue to occur monthly. Please be advised that failure to submit complete DMRs, failure to comply with the compliance schedule in your NPDES permit, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. Grand River Country Manor remains in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the ORC. Such actions can result in fines of up to \$10,000 per day of violation.

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Please inform this office, in writing, within 30 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response 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/cs

cc: Dustin Lewis, Lewis Wastewater Management
SP/Ashtabula/Windor Twp/Grand Valley Country Manor (3PR00232)