

**Environmental
Protection Agency**

Ted Stufekand, Governor
Lee Fisher, Lt. Governor
Chris Korfeski, Director

July 20, 2010

RE: GEAUGA COUNTY
NEWBURY TWP.
PUNDERSON STATE PARK
NPDES #3PP00009

Mr. Nick Fischbach
Regional Manager
ODNR Division of Parks and Recreation
P.O. Box 338
Newbury, OH 44065

Dear Mr. Fischbach:

On July 13, 2010, this writer met with you and Joe Kristoff to conduct an inspection of the sewage treatment plant serving the above referenced facility. The intent of the inspection was to review operations and maintenance of the wastewater treatment plant and compliance with your NPDES permit.

At the time of the inspection, the facility was producing what appeared to be a satisfactory quality effluent. Below are the findings and recommendations from the inspection:

INSPECTION

The contents of the aeration tank were a chocolate brown color and provided with adequate air supply with satisfactory rollover within the tank. The sludge return lines were in operation and returning a good amount of solids. The sludge digester was in satisfactory condition and provided with adequate aeration. Two blowers are provided at the plant. The facility runs one blower at a time with one as backup. A separate blower is provided for the sludge digester.

The clarifier contained some solids on the surface. It is understood the clarifier is scraped down weekly to remove and recirculate any solids accumulation on the weirs, baffle and sidewalls. The effluent from the clarifier appeared to be clear. The effluent trough contained some old "worms" from a previous outbreak. It is understood the treatment plant currently uses Aquabac in the aeration tank and the digester for control of any future worm outbreaks. The sand filters were in satisfactory condition.

The wastewater treatment plant is currently operating with one clarifier in service. It is understood the treatment plant clarifier had a shaft which froze up and the unit taken out of service around June 30, 2010. During the inspection, it was indicated the parts needed to repair the clarifier have been ordered and the clarifier may be back online sometime in September.

There have been elevated ammonia levels at the treatment plant during the past two months. The reason for the elevated ammonia is not directly known. It was indicated the cleaner used in portions of the park contained ammonia and the park has since ceased using this particular cleaner. The ammonia levels have caused NPDES permit violations for the month of May and potentially June 2010. If the ammonia exceedances continue, this office recommends the

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facility contact the DSW Compliance Assistance Unit. The Compliance Assistance Unit provides a free service to smaller wastewater treatment plants which includes:

- Perform plant performance evaluations to identify cause of compliance issues such as plant design, plant operation, administrative, etc.
- Troubleshoot complex plant problems.

If you are interested in utilizing the Compliance Assistance Unit, or if you have any questions, please contact Jon van Dommelen at (614) 644-2011 or by e-mail at: jon.vandommelen@epa.state.oh.us.

It was indicated the three pump stations in the collection system are subject to grease from food services at the restaurant, golf course and chalet. It is understood the pump station wet wells are cleaned at least yearly to remove excess oil and grease buildup. The sanitary sewer line which is located under the lake was plugged with grease and required a jet to blow the line clear. It is evident the facility has some oil and grease problems. The grease traps must be maintained and evaluated on a routine basis to ensure effectiveness. This office recommends the park routinely inspect the grease traps at each respective food service operation to ensure effective operation and cleaning schedules are adhered to. This office also recommends the park review the option of installing a main grease trap in the collection system to ensure grease will not impact the sanitary sewer lines or the wastewater treatment plant.

The pump station which serves the restaurant and inn is proposed for an upgrade. The upgrade will include changing the pump design and sizing. Ohio Administrative Code 3745-42-02 requires a Permit to Install be submitted for any modification to a treatment system. The proposed upgrades will change the sizing of pumps which is considered a modification to the treatment system.

The final outfall and lake were in satisfactory condition. The lake was free of any solids, foam or discoloration.

NPDES PERMIT

The Water Quality Standards (WQS) have been revised to reference e-coli bacteria versus fecal coliform. As such, upon permit renewal, your facility will be given a compliance schedule to obtain compliance with the WQS for e-coli. The renewal permit will reference fecal coliform limits with e-coli monitoring for the first disinfection season (2010). The final table will include e-coli limits.

The renewal permit will contain an effluent limit for phosphorus. The limit expected to be included in the renewal permit is 1.0 mg/l (monthly). The current phosphorus sampling has shown the average to be at or below 6.0 mg/l. It is apparent the wastewater plant would not be able to meet an estimated permit limit of 1.0 mg/l (monthly). As such, this office recommends the facility look into upgrading the plant to include a phosphorus removal system.

It is understood water treatment plant backwash water is sent to the wastewater treatment plant. It is understood the backwash water is discharged directly to the wastewater treatment plant.

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Please be aware, if the final effluent contain softener backwash, the NPDES permit will include monitoring for total dissolved solids. The WQS for total dissolved solids is currently 1500 mg/l (maximum). This standard is currently under review and subject to change in the near future.

In accordance with Part III, item 5, of the NPDES permit, testing procedures for the parameters specified by the NPDES permit must conform to regulation 40 CFR 136 which includes proper preservation of the samples. The samples must also be chilled to 6°C following collection and during transportation. Please be aware, any data reported that has not been conducted in accordance with 40 CFR 136 criteria is invalid and a violation of the NPDES permit.

The wastewater treatment plant is currently classified by the Ohio EPA as a Class II wastewater treatment facility. This classification is located in the NPDES permit which had an effective date of August 24, 2006. New operator and plant certification rules have gone in effect and are found in OAC 3745-7-04. The new regulations provide the plant classification rankings and operator staffing requirements. According to OAC 3745-7-04, the Punderson WWTP will be changed to a Class A facility during the permit renewal. The minimum staffing requirements for a Class A facility is 2 days per week for a minimum of 1 hour per week.

The eDMR PIN for this facility must be assigned to an individual who has working knowledge of the facility and wastewater treatment plant. Please be aware, federal regulations require a DMR be submitted by a "responsible official" or a "duly authorized representative" of the responsible official. Both terms are defined in the federal regulations. The renewal NPDES permit for the Punderson State Park WWTP will contain language quoted directly from the federal regulation (Title 40 of the Code of Federal Regulations, Part 122.22) that designates who may submit DMR data. As an example, you may have a lab fill out the form, since there is no restriction on who may fill out the DMR. However, the lab cannot legally submit those DMR's. A lab does not meet the definition of "responsible official" or "duly authorized representative" of a responsible official because the lab does not have "responsibility for the overall operation" of the facility, or meet any of the more specific requirements of the federal regulations. An Operator in Responsible Charge of a facility definitely meets the requirements of a duly authorized representative. The responsible official for the facility must make the arrangements to either submit the DRM's themselves by obtaining a PIN, or go through the eBusiness Center to delegate submit privileges to someone who meets the definition of a duly authorized representative. This delegated person would need to obtain their own PIN.

Guidance documents are available on the following Web page:

<http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx> If you have any questions regarding the process, please e-mail your concern to Jamie.Roberts@epa.state.oh.us

VIOLATION SUMMARY

A summary of the wastewater treatment plant monitoring violations for the period of January 1, 2007 through June 1, 2010 has been attached to this letter. Any reporting errors or eDMR errors must be reported to this office so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

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IN SUMMARY

The following items are of immediate concern to this office and must be attended to:

- 1) Begin a routine inspection program for the grease traps at facilities which discharge to the wastewater treatment plant.
- 2) Submit a Permit to Install application for any upgrades to the system, including any upgrades to pump station(s).

If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

Enclosures: Violation summary
ORC Form

pc: Geauga County Health Department
Joe Kristoff, Treatment Plant Coordinator

Discharge Violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2009	001	31616	Fecal Coliform	30D Conc	200	470.	8/1/2009
August 2009	001	31616	Fecal Coliform	7D Conc	400	470.	8/22/2009
June 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	4.4332	6/1/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	13.32	6/1/2010