

**Environmental  
Protection Agency**

Tim O'Rourke, Governor  
Lee Fisher, Lt. Governor  
Dana L. Henes, Director

November 18, 2010

RE: FINDLEY STATE PARK  
PERMIT NO. 3PP00004  
LORAIN COUNTY  
HUNTINGTON TOWNSHIP

Ms. Tara K. Lee, P.E.  
Ohio Department of Natural Resources  
Division of Engineering  
2045 Morse Road, F-3  
Columbus, Ohio 43229-6693

Dear Ms. Lee

On October 19, 2010, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Benjamin Derrick, Plant Operator. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection the following items were noted/discussed:

1. The plant design of the wastewater treatment system is 25,000 gpd.
2. The comminutor is not operational due to a bad fuse. Mr. Derrick indicated that this fuse is obsolete and has not been able to locate one. He further indicated that the appropriate repairs are scheduled to be completed before the spring 2011 plant start up.
3. The blowers were running and the plant was receiving good aeration.
4. The contents of the aeration tank were rusty brown in color and no foam was present.
5. The rusty color is the result of ferric chloride being added to the treatment plant for phosphorus removal.
6. The sludge return line was functioning properly.
7. Sludge was just recently wasted so the level in the settling tank was below the weir.
8. No scum build-up was present behind the baffle in the settling tank.
9. The weirs and the sidewalls in the settling tank were also free of scum build-up.
10. Two out of four surface sand filter beds were being used. The remaining two were covered with tarps. The surface sand filter beds were well maintained.
11. The treatment system is equipped with ultra violet disinfection. Both banks were operational.
12. The final effluent being discharged was clear and appeared to be of satisfactory visual quality. No impact to the receiving stream was noted.
13. The plant appeared to be well operated.

14. Agrisludge is contracted to haul the aerobically digested sludge as needed. The sludge is hauled to the Lodi WWTP and the Millersburg WWTP.
15. The treatment plant is scheduled to be shut down November 1, 2010.
16. Mr. Derrick indicated that the treatment plant has severely deteriorated as a result of using the ferric chloride. He indicated that the wastewater treatment plant is on the list to be replaced/upgraded. It is my understanding that technical proposals are due for this plant by November 19<sup>th</sup> and interviews with potential consultants are scheduled for December 1<sup>st</sup>.

This office has recently reviewed your self-monitoring reports covering the period June 1, 2009 through September 30, 2010 for the Campground WWTP. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

#### LIMIT VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	100	800.	6/1/2010
001	31616	Fecal Coliform	1D Conc	200	800.	6/23/2010

#### FREQUENCY VIOLATIONS

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Week	1	0	08/01/2009
001	80082	CBOD 5 day	1/Week	1	0	08/01/2009
001	00530	Total Suspended Solids	1/Week	1	0	08/22/2009
001	80082	CBOD 5 day	1/Week	1	0	08/22/2009
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	09/15/2009
001	00400	pH	1/Week	1	0	09/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	09/22/2009
001	00530	Total Suspended Solids	1/Week	1	0	10/08/2009
001	80082	CBOD 5 day	1/Week	1	0	10/08/2009
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	10/15/2009
001	00083	Color, Severity	1/Day	1	0	11/08/2009
001	00530	Total Suspended Solids	1/Week	1	0	11/08/2009
001	01330	Odor, Severity	1/Day	1	0	11/08/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/08/2009
001	50050	Flow Rate	1/Day	1	0	11/08/2009
001	80082	CBOD 5 day	1/Week	1	0	11/08/2009
001	00400	pH	1/Week	1	0	11/08/2009
001	00300	Dissolved Oxygen	1/Week	1	0	11/08/2009
001	00083	Color, Severity	1/Day	1	0	11/09/2009

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	11/09/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/09/2009
001	50050	Flow Rate	1/Day	1	0	11/09/2009
001	00083	Color, Severity	1/Day	1	0	11/10/2009
001	01330	Odor, Severity	1/Day	1	0	11/10/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/10/2009
001	50050	Flow Rate	1/Day	1	0	11/10/2009
001	00083	Color, Severity	1/Day	1	0	11/11/2009
001	01330	Odor, Severity	1/Day	1	0	11/11/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/11/2009
001	50050	Flow Rate	1/Day	1	0	11/11/2009
001	00083	Color, Severity	1/Day	1	0	11/12/2009
001	01330	Odor, Severity	1/Day	1	0	11/12/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/12/2009
001	50050	Flow Rate	1/Day	1	0	11/12/2009
001	00083	Color, Severity	1/Day	1	0	11/13/2009
001	01330	Odor, Severity	1/Day	1	0	11/13/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/13/2009
001	50050	Flow Rate	1/Day	1	0	11/13/2009
001	00083	Color, Severity	1/Day	1	0	11/14/2009
001	01330	Odor, Severity	1/Day	1	0	11/14/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/14/2009
001	50050	Flow Rate	1/Day	1	0	11/14/2009
001	00083	Color, Severity	1/Day	1	0	11/15/2009
001	00530	Total Suspended Solids	1/Week	1	0	11/15/2009
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	11/15/2009
001	01330	Odor, Severity	1/Day	1	0	11/15/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/15/2009
001	50050	Flow Rate	1/Day	1	0	11/15/2009
001	80082	CBOD 5 day	1/Week	1	0	11/15/2009
001	00400	pH	1/Week	1	0	11/15/2009
001	00300	Dissolved Oxygen	1/Week	1	0	11/15/2009
001	00083	Color, Severity	1/Day	1	0	11/16/2009
001	01330	Odor, Severity	1/Day	1	0	11/16/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/16/2009
001	50050	Flow Rate	1/Day	1	0	11/16/2009
001	00083	Color, Severity	1/Day	1	0	11/17/2009
001	01330	Odor, Severity	1/Day	1	0	11/17/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/17/2009
001	50050	Flow Rate	1/Day	1	0	11/17/2009
001	00083	Color, Severity	1/Day	1	0	11/18/2009
001	01330	Odor, Severity	1/Day	1	0	11/18/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/18/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50050	Flow Rate	1/Day	1	0	11/18/2009
001	00083	Color, Severity	1/Day	1	0	11/19/2009
001	01330	Odor, Severity	1/Day	1	0	11/19/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/19/2009
001	50050	Flow Rate	1/Day	1	0	11/19/2009
001	00083	Color, Severity	1/Day	1	0	11/20/2009
001	01330	Odor, Severity	1/Day	1	0	11/20/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/20/2009
001	50050	Flow Rate	1/Day	1	0	11/20/2009
001	00083	Color, Severity	1/Day	1	0	11/21/2009
001	01330	Odor, Severity	1/Day	1	0	11/21/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/21/2009
001	50050	Flow Rate	1/Day	1	0	11/21/2009
001	00083	Color, Severity	1/Day	1	0	11/22/2009
001	00530	Total Suspended Solids	1/Week	1	0	11/22/2009
001	01330	Odor, Severity	1/Day	1	0	11/22/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/22/2009
001	50050	Flow Rate	1/Day	1	0	11/22/2009
001	80082	CBOD 5 day	1/Week	1	0	11/22/2009
001	00400	pH	1/Week	1	0	11/22/2009
001	00300	Dissolved Oxygen	1/Week	1	0	11/22/2009
001	00083	Color, Severity	1/Day	1	0	11/23/2009
001	01330	Odor, Severity	1/Day	1	0	11/23/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/23/2009
001	50050	Flow Rate	1/Day	1	0	11/23/2009
001	00083	Color, Severity	1/Day	1	0	11/24/2009
001	01330	Odor, Severity	1/Day	1	0	11/24/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/24/2009
001	50050	Flow Rate	1/Day	1	0	11/24/2009
001	00083	Color, Severity	1/Day	1	0	11/25/2009
001	01330	Odor, Severity	1/Day	1	0	11/25/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/25/2009
001	50050	Flow Rate	1/Day	1	0	11/25/2009
001	00083	Color, Severity	1/Day	1	0	11/26/2009
001	01330	Odor, Severity	1/Day	1	0	11/26/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/26/2009
001	50050	Flow Rate	1/Day	1	0	11/26/2009
001	00083	Color, Severity	1/Day	1	0	11/27/2009
001	01330	Odor, Severity	1/Day	1	0	11/27/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/27/2009
001	50050	Flow Rate	1/Day	1	0	11/27/2009
001	00083	Color, Severity	1/Day	1	0	11/28/2009
001	01330	Odor, Severity	1/Day	1	0	11/28/2009

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01350	Turbidity, Severity	1/Day	1	0	11/28/2009
001	50050	Flow Rate	1/Day	1	0	11/28/2009
001	00083	Color, Severity	1/Day	1	0	11/29/2009
001	01330	Odor, Severity	1/Day	1	0	11/29/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/29/2009
001	50050	Flow Rate	1/Day	1	0	11/29/2009
001	00083	Color, Severity	1/Day	1	0	11/30/2009
001	01330	Odor, Severity	1/Day	1	0	11/30/2009
001	01350	Turbidity, Severity	1/Day	1	0	11/30/2009
001	50050	Flow Rate	1/Day	1	0	11/30/2009
001	00400	pH	1/Week	1	0	04/01/2010
001	00300	Dissolved Oxygen	1/Week	1	0	04/01/2010
001	00530	Total Suspended Solids	1/Week	1	0	04/15/2010
001	80082	CBOD 5 day	1/Week	1	0	04/15/2010
001	00400	pH	1/Week	1	0	04/15/2010
001	00300	Dissolved Oxygen	1/Week	1	0	04/15/2010
001	00530	Total Suspended Solids	1/Week	1	0	04/22/2010
001	80082	CBOD 5 day	1/Week	1	0	04/22/2010
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	06/15/2010
001	00530	Total Suspended Solids	1/Week	1	0	09/08/2010
001	80082	CBOD 5 day	1/Week	1	0	09/08/2010
001	00530	Total Suspended Solids	1/Week	1	0	09/22/2010
001	80082	CBOD 5 day	1/Week	1	0	09/22/2010

It appears that most of the frequency violations have occurred when the wastewater treatment plant is shut down. When the treatment system is shut down, no flow should be reported each month. This should eliminate frequency violations from occurring when the plant is shut down.

Additionally, Ohio EPA's Surface Water Information Management System (SWIMS) evaluates weekly monitoring requirements on a 7 day basis. SWIMS evaluates the measuring frequency requirement of the permit during the following periods of the month:

- a. Days 1-7
- b. Days 8-14
- c. Days 9-21
- d. Days 22-28

If two data points are entered in days 1-7 and no data is submitted during days 8-14, this will result in a frequency violation. During the month, data must be reported in each period to meet the facility's weekly monitoring requirement.

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**Please notify this office in writing within 30 days receipt of this letter confirming the Ohio Department of Natural Resources' intent along with time lines on replacing/upgrading Findley State Park's treatment plant. If this office can be of any assistance to you in this process, please do not hesitate to call.**

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt

pc: Benjamin Derrick, Plant Operator, Findley State Park