

Environmental
Protection Agency

Governor
Lt. Governor
Director



September 12, 2011

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 August 16, 2011, 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 was not operational due to a bad fuse. Mr. Derrick indicated that this fuse is obsolete and has not been able to locate one. This deficiency was noted in the last correspondence from this office dated November 18, 2010.
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. The rusty color is the result of ferric chloride being added to the treatment plant for phosphorus removal.
5. **Currently, magnesium hydroxide has to be transferred from the storage drum to the day tank with a bucket and then mixed with a hand drill and drywall mixer. It is recommended that a transfer pump be used in lieu of manually transferring this material.**
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. **Better access to the outfall should be provided to aid in the collection of the effluent samples. The existing makeshift steps in the hillside can be a safety hazard during inclement weather conditions.**
14. Mr. Derrick indicated that he was preparing to post a permanent marker at the outfall per the requirement of Part II, letter J of the facility's NPDES permit.
15. Agrisludge is contracted to haul the facility's sludge to the Lodi WWTP.
16. **The treatment system continues to show signs of severe deterioration on the aeration tank, settling tank, and associated piping. Mr. Derrick indicated that the deterioration is the result of using ferric chloride.**
17. **Correspondence from you dated November 23, 2010, indicates that final design and submission to this office for the wastewater treatment plant replacement/upgrade is scheduled for September 2011 and construction is scheduled to begin in April 2012. This office requests that you confirm the accuracy of this schedule.**

This office has recently reviewed your self-monitoring reports covering the period October 1, 2010 through June 30, 2011 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	80082	CBOD 5 day	1D Conc	15	27.	10/19/2010

FREQUENCY VIOLATIONS

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Week	1	0	10/01/2010
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	10/01/2010
001	80082	CBOD 5 day	1/Week	1	0	10/01/2010
001	00530	Total Suspended Solids	1/Week	1	0	10/22/2010
001	80082	CBOD 5 day	1/Week	1	0	10/22/2010
001	01350	Turbidity, Severity	1/Day	1	0	04/01/2011
001	50050	Flow Rate	1/Day	1	0	04/01/2011
001	80082	CBOD 5 day	1/Week	1	0	04/01/2011
001	00400	pH	1/Week	1	0	04/01/2011

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00300	Dissolved Oxygen	1/Week	1	0	04/01/2011
001	00010	Water Temperature	1/Day	1	0	04/02/2011
001	00083	Color, Severity	1/Day	1	0	04/02/2011
001	01330	Odor, Severity	1/Day	1	0	04/02/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/02/2011
001	50050	Flow Rate	1/Day	1	0	04/02/2011
001	00010	Water Temperature	1/Day	1	0	04/03/2011
001	00083	Color, Severity	1/Day	1	0	04/03/2011
001	01330	Odor, Severity	1/Day	1	0	04/03/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/03/2011
001	50050	Flow Rate	1/Day	1	0	04/03/2011
001	00010	Water Temperature	1/Day	1	0	04/04/2011
001	00083	Color, Severity	1/Day	1	0	04/04/2011
001	01330	Odor, Severity	1/Day	1	0	04/04/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/04/2011
001	50050	Flow Rate	1/Day	1	0	04/04/2011
001	00010	Water Temperature	1/Day	1	0	04/05/2011
001	00083	Color, Severity	1/Day	1	0	04/05/2011
001	01330	Odor, Severity	1/Day	1	0	04/05/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/05/2011
001	50050	Flow Rate	1/Day	1	0	04/05/2011
001	00010	Water Temperature	1/Day	1	0	04/06/2011
001	00083	Color, Severity	1/Day	1	0	04/06/2011
001	01330	Odor, Severity	1/Day	1	0	04/06/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/06/2011
001	50050	Flow Rate	1/Day	1	0	04/06/2011
001	00010	Water Temperature	1/Day	1	0	04/07/2011
001	00083	Color, Severity	1/Day	1	0	04/07/2011
001	01330	Odor, Severity	1/Day	1	0	04/07/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/07/2011
001	50050	Flow Rate	1/Day	1	0	04/07/2011
001	00010	Water Temperature	1/Day	1	0	04/08/2011
001	00083	Color, Severity	1/Day	1	0	04/08/2011
001	00530	Total Suspended Solids	1/Week	1	0	04/08/2011
001	01330	Odor, Severity	1/Day	1	0	04/08/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/08/2011
001	50050	Flow Rate	1/Day	1	0	04/08/2011
001	80082	CBOD 5 day	1/Week	1	0	04/08/2011
001	00400	pH	1/Week	1	0	04/08/2011
001	00300	Dissolved Oxygen	1/Week	1	0	04/08/2011
001	00010	Water Temperature	1/Day	1	0	04/09/2011
001	00083	Color, Severity	1/Day	1	0	04/09/2011

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	04/09/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/09/2011
001	50050	Flow Rate	1/Day	1	0	04/09/2011
001	00010	Water Temperature	1/Day	1	0	04/10/2011
001	00083	Color, Severity	1/Day	1	0	04/10/2011
001	01330	Odor, Severity	1/Day	1	0	04/10/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/10/2011
001	50050	Flow Rate	1/Day	1	0	04/10/2011
001	00010	Water Temperature	1/Day	1	0	04/11/2011
001	00083	Color, Severity	1/Day	1	0	04/11/2011
001	01330	Odor, Severity	1/Day	1	0	04/11/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/11/2011
001	50050	Flow Rate	1/Day	1	0	04/11/2011
001	00010	Water Temperature	1/Day	1	0	04/12/2011
001	00083	Color, Severity	1/Day	1	0	04/12/2011
001	01330	Odor, Severity	1/Day	1	0	04/12/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/12/2011
001	50050	Flow Rate	1/Day	1	0	04/12/2011
001	00010	Water Temperature	1/Day	1	0	04/13/2011
001	00083	Color, Severity	1/Day	1	0	04/13/2011
001	01330	Odor, Severity	1/Day	1	0	04/13/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/13/2011
001	50050	Flow Rate	1/Day	1	0	04/13/2011
001	00010	Water Temperature	1/Day	1	0	04/14/2011
001	00083	Color, Severity	1/Day	1	0	04/14/2011
001	01330	Odor, Severity	1/Day	1	0	04/14/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/14/2011
001	50050	Flow Rate	1/Day	1	0	04/14/2011
001	00010	Water Temperature	1/Day	1	0	04/15/2011
001	00083	Color, Severity	1/Day	1	0	04/15/2011
001	00530	Total Suspended Solids	1/Week	1	0	04/15/2011
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	04/15/2011
001	01330	Odor, Severity	1/Day	1	0	04/15/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/15/2011
001	50050	Flow Rate	1/Day	1	0	04/15/2011
001	80082	CBOD 5 day	1/Week	1	0	04/15/2011
001	00400	pH	1/Week	1	0	04/15/2011
001	00300	Dissolved Oxygen	1/Week	1	0	04/15/2011
001	00010	Water Temperature	1/Day	1	0	04/16/2011
001	00083	Color, Severity	1/Day	1	0	04/16/2011
001	01330	Odor, Severity	1/Day	1	0	04/16/2011

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01350	Turbidity, Severity	1/Day	1	0	04/16/2011
001	50050	Flow Rate	1/Day	1	0	04/16/2011
001	00010	Water Temperature	1/Day	1	0	04/17/2011
001	00083	Color, Severity	1/Day	1	0	04/17/2011
001	01330	Odor, Severity	1/Day	1	0	04/17/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/17/2011
001	50050	Flow Rate	1/Day	1	0	04/17/2011
001	00010	Water Temperature	1/Day	1	0	04/18/2011
001	00083	Color, Severity	1/Day	1	0	04/18/2011
001	01330	Odor, Severity	1/Day	1	0	04/18/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/18/2011
001	50050	Flow Rate	1/Day	1	0	04/18/2011
001	00010	Water Temperature	1/Day	1	0	04/19/2011
001	00083	Color, Severity	1/Day	1	0	04/19/2011
001	01330	Odor, Severity	1/Day	1	0	04/19/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/19/2011
001	50050	Flow Rate	1/Day	1	0	04/19/2011
001	00010	Water Temperature	1/Day	1	0	04/20/2011
001	00083	Color, Severity	1/Day	1	0	04/20/2011
001	01330	Odor, Severity	1/Day	1	0	04/20/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/20/2011
001	50050	Flow Rate	1/Day	1	0	04/20/2011
001	00010	Water Temperature	1/Day	1	0	04/21/2011
001	00083	Color, Severity	1/Day	1	0	04/21/2011
001	01330	Odor, Severity	1/Day	1	0	04/21/2011
001	01350	Turbidity, Severity	1/Day	1	0	04/21/2011
001	50050	Flow Rate	1/Day	1	0	04/21/2011
001	00530	Total Suspended Solids	1/Week	1	0	04/22/2011
001	80082	CBOD 5 day	1/Week	1	0	04/22/2011
001	00400	pH	1/Week	1	0	04/22/2011
001	00300	Dissolved Oxygen	1/Week	1	0	04/22/2011
001	00630	Nitrite Plus Nitrate,	1/2months	1	0	05/01/2011
001	31648	E. coli	1/Month	1	0	05/01/2011
001	00530	Total Suspended Solids	1/Week	1	0	06/01/2011
001	80082	CBOD 5 day	1/Week	1	0	06/01/2011
001	00630	Nitrite Plus Nitrate,	1/2months	1	0	06/01/2011
001	31648	E. coli	1/Month	1	0	06/01/2011
001	00400	pH	1/Week	1	0	06/22/2011
001	00300	Dissolved Oxygen	1/Week	1	0	06/22/2011

MS. TARA K. LEE, P.E.
FINDLEY STATE PARK
SEPTEMBER 12, 2011
PAGE 6 OF 6

It appears that most of the frequency violations occurred when the wastewater treatment plant may have been 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 seven 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. Any data submitted beyond the 28th is not recognized by SWIMS when evaluating compliance for weekly monitoring.

Please notify this office in writing, within 30 days receipt of this letter, of your intentions to resolve items 5, 13, and 16 along with the Ohio Department of Natural Resources' intent on replacing/upgrading Findley State Park's treatment plant.

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/cs

cc: Benjamin Derrick- Plant Operator, Findley State Park