



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

October 29, 2008

RE: TRUMBULL COUNTY  
NEWTON TOWNSHIP  
BLUE WATER MANOR  
NPDES PERMIT NO. OH0107433  
OHIO EPA PERMIT NO. 3PV00060

Mr. Gerald Apel, Owner  
Blue Water Manor, Ltd.  
P.O. Box 6  
3260 Carson Salt Springs  
Lordstown, OH 44444

Dear Mr. Apel:

An inspection was conducted by the undersigned of the sanitary wastewater treatment plant serving the above referenced facility on October 21, 2008. The facility was represented by Mr. Virgil Gannon, Park Maintenance. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

The wet-stream treatment components consist of a 52,000-gpd extended aeration activated sludge treatment process, final settling tank, rapid sand filters, and UV disinfection. Sludge handling consists of an aerated sludge holding tank.

At the time of the inspection, the following observations and comments were noted:

1. The final effluent was clear with no observable adverse impact to the receiving stream. There was no evidence of an unusual or uncharacteristic nuisance odor.
2. The north clarifier sludge return line had broken. Mr. Gannon indicated that he expected to have the line repaired upon receipt of the replacement parts.
3. Only one of the two blowers appeared to be operational. The second blower must be repaired and returned to normal operation.
4. A mid-rail shall be installed along all sections of guardrail.
5. The YSI Dissolved Oxygen Probe was inoperative due to a bad sensor/membrane. Mr. Gannon indicated that a replacement sensor had been ordered.

A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period, August 2007 – September 2008, indicate violations of the final effluent limitations contained in the NPDES permit. The specific instances of non-compliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2007	001	Nitrogen, Ammonia (NH3)	30D Conc	4.9	24.55	9/1/2007
September 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	7.4	29.5	9/1/2007
September 2007	001	Nitrogen, Ammonia (NH3)	30D Qty	1.0	1.48637	9/1/2007
September 2007	001	Nitrogen, Ammonia (NH3)	7D Qty	1.5	1.56321	9/1/2007
September 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	7.4	19.6	9/15/2007
October 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	7.4	8.52	10/1/2007
June 2008	001	Nitrogen, Ammonia (NH3)	30D Conc	4.9	5.955	6/1/2008

MR. GERALD APEL, OWNER  
BLUE WATER MANOR  
OCTOBER 29, 2008  
PAGE 2

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2008	001	Nitrogen, Ammonia (NH3)	30D Conc	4.9	8.23	8/1/2008
August 2008	001	Nitrogen, Ammonia (NH3)	7D Conc	7.4	15.1	8/15/2008
September 2008	001	Nitrogen, Ammonia (NH3)	30D Conc	4.9	4.93333	9/1/2008
September 2008	001	Nitrogen, Ammonia (NH3)	7D Conc	7.4	9.73	9/1/2008

In addition to the above, our review of the facility's data reporting procedures noted the following:

- We understand that the facility has recently switched from Valley Environmental Labs to Cardinal Labs. Valley had been submitting the electronic DMRs (eDMRs) for the facility. Pursuant to Part III, Item 28 of your NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22". 40 CFR 122.22 (a) states that reports for corporations can only be signed and certified by a responsible corporate officer or by a duly authorized representative of said individual. Delegations of authority must be made in writing to the Director of Ohio EPA.

Ohio EPA has recently revised the electronic data reporting process, including the assignment of Personal Identification Numbers (PINs), to comply with the requirements of the 2005 Cross-Media Electronic Reporting Regulation (CROMERR). Only the person(s) who have the privilege of submitting data, i.e. the responsible or authorized official(s), will need a CROMERR-compliant PIN through Ohio EPA's eBusiness Center. Because the PIN application process requires mailing a notarized form to Ohio EPA, you should plan ahead and schedule time to complete this process. There are six basic steps involved in obtaining a PIN:

1. Log into Ohio EPA's eBusiness Center: <https://ebiz.epa.ohio.gov/login.jsp>
  2. Complete and print the PIN request/Subscriber Agreement form.
  3. Have the form notarized and sign it.
  4. Mail the notarized form to Ohio EPA.
  5. When you receive the PIN assignment letter from Ohio EPA, log into the eBusiness Center to activate the PIN.
  6. Store the PIN assignment letter in a secure location.
- Ohio Administrative Code (OAC) 3745-7-02 requires that you have a written contract with your certified operator. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the services (i.e. **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of the contract for submission of DMRs. A copy of the completed contract should be forwarded to this office.
  - Pursuant to the new recordkeeping requirements contained in Ohio Administrative Code (OAC) 3745-7-09, specific operation and maintenance records of the treatment system must now be kept on file at the facility. The complete Operator Certification rules are available online at <http://www.epa.state.oh.us/ddagw/oac.html>.

MR. GERALD APEL, OWNER  
BLUE WATER MANOR  
OCTOBER 29, 2008  
PAGE 3

Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above referenced violations and/or deficiencies. Please be advised that past or current acts of non-compliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mh

File: Semipublic/Trumbull County/Newton Twp./Blue Water MHP