



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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

August 17, 2007

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 August 2, 2007. The facility was represented by your contract operator, Mr. Scott Mascioli. 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.

**Inspection Findings/Compliance Status**

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. All treatment units appeared to be in satisfactory operation. The effluent was clear with no observable adverse impact to the receiving stream. There was no evidence of an unusual or uncharacteristic nuisance odor.
2. Please ensure that the flowmeter is calibrated on a yearly basis by a certified technician.
3. Painting of the various plant components is expected to be completed this year.
4. Appropriate covers or guards must be installed over the V-belts.
5. A handrail must be installed on the walkway between the aeration and settling tanks.

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A review of the facility's monthly operating reports received by Ohio EPA for the period January 2006 – July 2007 indicate violations of the final effluent limitations contained in the NPDES permit. The specific instances of noncompliance are as follows:

Report Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
Mar 2007	001	Dissolved Oxygen	1D Conc	5.0	1.6	3/13/2007
Jan 2006	001	pH	1D Conc	6.5	6.3	1/5/2006
Jul 2006	001	Fecal Coliform	7D Conc	2000	5500	7/1/2006

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

1. We understand that Valley Environmental Labs has been routinely submitting electronic monthly operating reports for the facility. Pursuant to Part III of the NPDES permit, all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22. As such, reports for companies can only be signed and certified by a corporate officer, general partner, proprietor, or by a duly authorized representative of said individual. Pursuant to 40 CFR 122.22 (b):

***A person is a duly authorized representative only if:***

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***
- (3) The written authorization is submitted to the Director.***

Copies of all reports, and substantiating documentation, shall be maintained on site for a period of at least 3 years.

2. Ohio Administrative Code (OAC)3745-7-02 requires that you have a 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

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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 Monthly Operating Reports.

3. The facility shall ensure that detailed analytical reports, including a complete chain of custody record, are received from its contract laboratory.
4. Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures shall be developed for all analyses performed onsite, e.g., pH, DO, etc. Calibration records must be maintained for all in-house analytical instrumentation.

**Summary/Conclusion**

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 noncompliance 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/mt

cc: Scott Mascioli