

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

October 19, 2011

RE: MANONING CONTY
HIGH GROVE GOLF COURSE
2977 NEWTON FALLS ROAD
NPDES PERMIT NO. 3PR00482
FFY 2012 CEI

Ms. Holly Serensky-Lupo, Owner
High Grove Golf Course
9530 Beard Road
Poland, OH 44514

Ms. Serensky-Lupo:

On October 18, 2011, this writer conducted an inspection of the wastewater treatment system for the High Grove Golf Course. The facility was closed at the time of the inspection and no one was at the site to attend the inspection. An October 14, 2011, telephone message to you was intended to inform you of the inspection. However, the message was not return before the inspection,

The wastewater treatment system includes a home aerator followed by the discharge of wastewater to one of the ponds east of the club house building. It appeared that a relatively new aerator is available to provide air to the treatment tank. No disinfection system was apparent at the time of the inspection.

The compliance record for the treatment system was reviewed as part of this inspection. Following is a list of violations identified from September 2010 through August 2011.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2010	Fecal Coliform	30D Conc	1000	2236.06	9/1/2010
September 2010	Fecal Coliform	7D Conc	2000	2500.	9/8/2010
September 2010	Fecal Coliform	7D Conc	2000	2000.	9/22/2010
October 2010	Fecal Coliform	30D Conc	1000	2280.35	10/1/2010
October 2010	Fecal Coliform	7D Conc	2000	2000.	10/1/2010
October 2010	Fecal Coliform	7D Conc	2000	2600.	10/22/2010
May 2011	Nitrogen, Ammonia	30D Conc	1.0	6.1	5/1/2011
May 2011	Nitrogen, Ammonia	30D Qty	0.005	.00924	5/1/2011
May 2011	Fecal Coliform	30D Conc	1000	47749.3	5/1/2011
May 2011	Nitrogen, Ammonia	7D Conc	1.5	6.1	5/8/2011

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	Nitrogen, Ammonia	7D Qty	0.008	.00924	5/8/2011
May 2011	Fecal Coliform	7D Conc	2000	60000.	5/8/2011
May 2011	Fecal Coliform	7D Conc	2000	38000.	5/22/2011
June 2011	Total Suspended Solids	30D Conc	12.0	39	6/1/2011
June 2011	Total Suspended Solids	7D Conc	18.0	39.	6/1/2011
June 2011	Nitrogen, Ammonia	30D Conc	1.0	1.45	6/1/2011
June 2011	Fecal Coliform	30D Conc	1000	5916.07	6/1/2011
June 2011	Fecal Coliform	7D Conc	2000	35000.	6/22/2011
July 2011	Nitrogen, Ammonia	30D Conc	1.0	30.	7/1/2011
July 2011	Nitrogen, Ammonia	30D Qty	0.005	.04542	7/1/2011
July 2011	Fecal Coliform	30D Conc	1000	7141.42	7/1/2011
July 2011	Nitrogen, Ammonia	7D Conc	1.5	30.	7/22/2011
July 2011	Nitrogen, Ammonia	7D Qty	0.008	.04542	7/22/2011
July 2011	Fecal Coliform	7D Conc	2000	51000.	7/22/2011
August 2011	Total Suspended Solids	30D Conc	12.0	20.	8/1/2011
August 2011	Fecal Coliform	30D Conc	1000	6986.19	8/1/2011
August 2011	Total Suspended Solids	7D Conc	18.0	20.	8/8/2011
August 2011	Fecal Coliform	7D Conc	2000	2182.	8/8/2011
August 2011	Fecal Coliform	7D Conc	2000	22368.	8/22/2011

As previously discussed with you, the treatment system is unable to comply with pollutant limits in National Pollutant Discharge Elimination System (NPDES) Permit No. 3PR00482. The violations listed above have caused the High Grove Golf Course to be in Significant Noncompliance with the NPDES Permit. Be advised that violations of the NPDES Permit constitute violations of Ohio Revised Code (R.C.) 6111.07 and are subject to penalties of \$10,000.00 per day per violation.

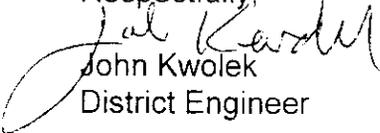
In response to previous violations, a PTI for a soil infiltration system was approved on September 2, 2010. The intent of the soil dissipation system was to dissipate treated wastewater in the soil rather than discharging to surface waters. The infiltration system would enable the NPDES Permit to be rescinded. However, it appears the soil infiltration system was never installed and the violations continue.

Attached is a compliance plan that is intended to get the High Grove Golf Course into compliance without escalating enforcement action. Escalated enforcement could include attorney fees and fines. If you are agreeable to the plan, please provide a response to this letter by signing the plan and returning the signed document to this office no later than November 4, 2011. In the event the plan is not returned by November 4, 2011, this office will have no choice but to initiate enforcement action against the High Grove Golf Course.

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You may contact this writer at (330)963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have.

Respectfully,


John Kwolek
District Engineer

JK/cs

cc. Joe DeNiro, Operator of Record

Compliance Plan
High Grove Golf Course

The High Grove Golf Course agrees to the following compliance plan in order to eliminate violations of NPDES Permit No. 3PR00482*AA.

1. As soon as possible, but not later than November 4, 2011, the High Grove Golf Course shall submit a letter to the Ohio EPA Northeast District Office requesting a three month extension of Permit-to-Install (PTI) No. 765192 to June 2, 2012.
2. As soon as possible, but not later than May 14, 2012, the High Grove Golf Course agrees to initiate construction of the soil dissipation system approved by Ohio EPA. The system was approved by PTI No. 765192 issued on September 2, 2010
3. Seven days prior to initiating construction of the soil dissipation system, the High Grove Golf Course shall inform the Ohio EPA Northeast District Office of the start date. An inspection of the system will be scheduled at that time.
4. As soon as possible' but no later than May 25, 2012, the High Grove Golf Course shall cease to discharge wastewater to surface waters of the state.

Signature

Date

If you agree to the schedule, sign and return to:

John Kwolek
District Engineer
Ohio EPA Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087