Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 29, 2011

RE: ASHTABULA COUNTY
GENEVA ON THE LAKE VILLAGE WWTP
OHIO EPA PERMIT 3PC00020
COMPLIANCE EVALUATION INSPECTION

NOTICE OF VIOLATION

CERTIFIED MAIL

Honorable David Nelson, Mayor
James Hockaday, Village Administer
Village of Geneva-on-the-Lake
4929 South Warner Drive
Geneva-on-the-Lake, OH 44041

Dear Mayor Nelson and Mr. Hockaday:

On December 29, 2011, a site inspection was conducted at the above referenced facility at 4843 North Broadway (State Route 534), Geneva-on-the-Lake Village, Ashtabula County. The inspection was conducted by John Schmidt of this office, I spoke briefly with Fred Mitchell, Wastewater Treatment Plant (WWTP) Operator, prior to the inspection, and James Hockaday, Village Administrator, represented the Village of Geneva-on-the-Lake (GOTL) during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit, and in conjunction with the renewal of that permit. The last compliance inspection was conducted on November 3, 2010.

The system consists of a emergency retention basin (equalization tank), preliminary treatment consisting of bar screens and manual grit removal, a 20,000-gallon raw sewage pump station, a 415,000 gpd dual-unit contact-stabilization activated sludge treatment process, final settling tanks, chlorine disinfection, and sodium bisulfate dechlorination. Sodium bisulfate is fed for chlorine residual control. Sludge management consists of aerobic digestion and settling tanks, with dewatering on sludge drying beds. Geneva-on-the-Lake has the option of either land application or hauling the sludge to a landfill. Prior to 2009, sludge was land applied to a farmer's field as Class B sludge in Austinburg Township. Since 2009, sludge is hauled to a sanitary landfill in Geneva Township. The facility discharges a sewer along State Route 531 to the east of the plant, which then flows to Lake Erie to the north of the facility. Generators provide backup power to the entire facility.

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Ohio EPA understands that the plant has a bypass from the former Imhoff tanks converted into an equalization tank. The bypass is blended with the final effluent prior to Outfall 001. Outfall 001 is located downstream of both the final plant discharge and Outfall 602.

Observations and Notations

1. Victor Quinones, Wastewater Superintendent, is identified as the operator of record for this facility. Log books were available for inspection.

2. Influent and effluent monitoring time proportional composite samplers have been retrofitted to monitor on a flow-proportional basis in June 2011. Samples are maintained at the proper temperature.

3. Screenings and grit are containerized for disposal at a solid waste landfill. The bar screen and comminutor were noted in operating condition.

4. New flow meters and totalizers were installed in phases between Mid-April and completed on June 7, 2011. Temporary meters were utilized between January and Mid-April.

5. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming. The surface of the clarifier was clear. The effluent trough was clean and there was no scum around the effluent baffle or the trough. Effluent channels and weirs are scrubbed weekly.

6. Ohio EPA still notes issues with the plant maintaining acceptable bacteria levels (E. Coli) in its final effluent. Ohio EPA notes that the infiltration report, E. Coli treatability status report, and E. Coli treatment feasibility studies required by your National Pollutant Discharge Elimination System (NPDES) permit have not been submitted as required by your NPDES permit. We discussed current actions by the Village to secure funding for a new disinfection system.

7. The chlorine contact tank has new peristaltic feed pumps for better chlorine control installed the fall of 2009. The configuration of the chlorine contact tanks pose a concern for short circuiting of the flow and not providing the proper disinfection contact time. Per our discussions the Village intends to submit a permit-to-install (PTI) for upgrading the disinfection system with a new chlorine tank or an ultraviolet light disinfection system.

8. The sludge drying beds were in use at the time of the inspection. Ohio EPA notes that surface drainage at the WWTP drains into the sludge beds. Berms should be installed to eliminate surface water drainage into these beds.

9. The WWTP laboratory performs monitoring of pH, temperature, dissolved oxygen, and chlorine residual. Geneva-on-the-Lake contracts with Northcoast Laboratories for Biochemical Oxygen Demand (BOD), suspended solids, ammonia-nitrogen, phosphorus, metals, oil and grease, nitrate-nitrite, bacteria, and quality assurance samples from the WWTP laboratory.

10. The final effluent at the outlet to Lake Erie could not be observed due to the outlet being submerged. During the inspection I observed an open manhole at the facility immediately upstream of Outfall 001 and the final discharge appeared to be of acceptable visual quality.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2010 through December 1, 2011 indicates noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Qty	47	62.6345	3/1/2011
001	00530	Total Suspended Solids	7D Qty	71	93.4970	3/1/2011
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	2.7	3/1/2011
001	00530	Total Suspended Solids	7D Qty	71	75.0754	3/8/2011
001	00530	Total Suspended Solids	7D Qty	71	88.2188	3/22/2011
001	00530	Total Suspended Solids	30D Qty	47	53.3183	4/1/2011
001	00530	Total Suspended Solids	7D Qty	71	90.0035	4/1/2011
001	00530	Total Suspended Solids	7D Qty	71	87.2291	4/15/2011
001	00530	Total Suspended Solids	30D Qty	47	57.8002	5/1/2011
001	00530	Total Suspended Solids	7D Qty	71	73.4895	5/1/2011
001	31648	E. coli	30D Conc	126	467.159	5/1/2011
001	00530	Total Suspended Solids	7D Qty	71	87.1950	5/22/2011
001	31648	E. coli	30D Conc	126	713.	6/1/2011
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	10.1	6/1/2011
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00001	6/1/2011
001	00530	Total Suspended Solids	30D Conc	30	30.25	7/1/2011
001	31648	E. coli	30D Conc	126	236.908	7/1/2011
001	00530	Total Suspended Solids	7D Conc	45	65.	7/8/2011
001	31648	E. coli	30D Conc	126	515.764	8/1/2011
001	00530	Total Suspended Solids	30D Conc	30	47.4444	8/1/2011
001	00530	Total Suspended Solids	30D Qty	47	273.107	8/1/2011
001	00530	Total Suspended Solids	7D Conc	45	188.	8/22/2011
001	00530	Total Suspended Solids	7D Qty	71	1185.94	8/22/2011
001	80082	CBOD 5 day	7D Qty	63	115.154	8/22/2011
001	00400	pH	1D Conc	9.0	9.1	11/20/2011

Ohio EPA notes that the majority of these effluent violations are related to bacteriological sampling for E. Coli and excessive suspended solids and that this was an issue that GOTL has been struggling with for more than three years, as evidenced by previous Compliance Evaluation Inspection (CEI) inspections conducted between 2008 and 2010. On October 24, 2011, Ohio EPA notified GOTL as being in significant noncompliance for suspended solids, bacteria (E. Coli) and mercury. GOTL provided a response to the significant noncompliance notice on November 21, 2011. Ohio EPA acknowledges that GOTL has secured loans and a

consultant to prepare permit-to-install (PTI) applications to address these issues, including new sludge handling facilities, disinfection facilities, and address excessive inflow and infiltration through a combination of system repairs and flow equalization. A conference call was held on April 19, 2011, that discussed new sludge dewatering facilities, a non-potable water system, an enhanced chlorine disinfection system, and a mercury variance. GOTL submitted a mercury variance application as a part of its NPDES renewal, which is currently pending with the agency. A meeting had been scheduled for December 12, 2011, that has been postponed that was to include timelines for conducting necessary improvements. Ohio EPA understands that GOTL will have a finalized schedule by January 13, 2012. GOTL must provide a written schedule to address necessary plant improvements to ensure that these violations are not repeated in the future.

Reporting Violations

No reporting frequency violations were noted; however the following reporting code violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
602	74063	Overflow Volume			AD	1/1/2011
602	82517	Duration of Discharge			AD	1/1/2011
602	74063	Overflow Volume			AD	3/17/2011
602	74063	Overflow Volume			AD	3/16/2011
602	74063	Overflow Volume			AD	3/10/2011
602	74063	Overflow Volume			AD	3/5/2011
581	00627	Nitrogen Kjeldahl, Total			AJ	8/4/2011
602	74063	Overflow Volume			AD	2/28/2011
602	74063	Overflow Volume			AD	2/18/2011
602	74063	Overflow Volume			AD	2/17/2011
001	50050	Flow Rate			AD	11/30/2010
001	50050	Flow Rate			AD	11/29/2010
001	50050	Flow Rate			AD	11/28/2010
001	50050	Flow Rate			AD	11/27/2010
001	50050	Flow Rate			AD	11/26/2010
001	50050	Flow Rate			AD	11/25/2010
001	50050	Flow Rate			AD	11/24/2010
001	50050	Flow Rate			AD	11/23/2010
001	50050	Flow Rate			AD	11/22/2010
001	50050	Flow Rate			AD	11/21/2010
001	50050	Flow Rate			AD	11/20/2010
001	50050	Flow Rate			AD	11/19/2010
001	50050	Flow Rate			AD	11/18/2010
001	50050	Flow Rate			AD	12/20/2010
001	50050	Flow Rate			AD	12/19/2010
001	50050	Flow Rate			AD	12/18/2010
001	50050	Flow Rate			AD	12/17/2010
001	50050	Flow Rate			AD	12/16/2010
001	50050	Flow Rate			AD	12/15/2010

001	50050	Flow Rate	AD	12/14/2010
001	50050	Flow Rate	AD	12/13/2010
001	50050	Flow Rate	AD	12/12/2010
001	50050	Flow Rate	AD	12/11/2010
001	50050	Flow Rate	AD	12/10/2010
001	50050	Flow Rate	AD	12/9/2010
001	50050	Flow Rate	AD	12/8/2010
001	50050	Flow Rate	AD	12/7/2010
001	50050	Flow Rate	AD	12/6/2010
001	50050	Flow Rate	AD	12/5/2010
001	50050	Flow Rate	AD	12/4/2010
001	50050	Flow Rate	AD	12/3/2010
001	50050	Flow Rate	AD	12/2/2010
001	50050	Flow Rate	AD	12/1/2010
602	74063	Overflow Volume	AD	12/1/2010

GOTL provided written responses to replacing a failing flow meter on December 8, 2010 and January 25, 2011. A conference call was held on April 19, 2011, regarding replacement of the flow meters. No further information is needed to respond to the violations.

Compliance Schedule Violations

Ohio EPA notes the following regarding the compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
6/1/2007	5/31/2012	9/1/2007	1/2/2008	11599	Bypass	Infiltration Report
6/1/2007	5/31/2012	6/1/2008	12/8/2008	95999	Other	E Coli Status Report
6/1/2007	5/31/2012	12/1/2008	11/7/2011	20099	Other	Mercury Treatabilily Report
6/1/2007	5/31/2012	6/1/2009	Unknown	---	Other	E. Coli PTI or Status
6/1/2007	5/31/2012	6/1/2010	Unknown	---	Construction	Complete Construction

GOTL has acknowledged that improvements are needed to the disinfection system in order to comply with the bacteria limits. The mercury variance will address the mercury treatability report. As stated above, Ohio EPA will need revised timelines regarding necessary plant improvements to address remaining milestones. During the inspection we discussed various activities that GOTL has undertaken and plans to undertake regarding its I/I study, including receiving information from I/I reduction activities at Geneva State Park and Indian Creek campground, as well as elimination of laterals from demolished buildings. This information should be summarized to Ohio EPA as part of an annual report.

Based upon the inspection findings and the overall compliance record of the facility, Geneva-on-the-Lake Village remains in **significant noncompliance** with the terms and conditions of its NPDES permit in regards to bacteria for the Geneva-on-the-Lake WWTP, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

File: Municipal/Geneva-on-the-Lake Village WWTP (Ashtabula Co.)/PC