



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 13, 2012

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:

Ohio EPA conducted a compliance evaluation inspection at the above-referenced facility on March 12, 2012. Mr. George Vanderwall represented Blue Water Manor and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment system, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The wet-stream treatment components consist of an influent bar screen, 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. Treated effluent is discharged to an unnamed tributary of Duck Creek.

During the inspection, the following observations and/or deficiencies were noted:

1. At the time of the inspection, the overall operation and maintenance of the treatment works was satisfactory. All treatment processes appeared to be online at the time of the inspection.
2. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the receiving stream.
3. Please describe the procedure for cleaning the influent bar screen, as safety concerns exist with having to climb down a ladder to access it. You should also reference OSHA, Code of Federal Regulations (CFR), 29CFR1910.146 to ensure that all confined space entry requirements are being met whenever maintenance is performed on the bar screen.
4. Heavy foaming was observed in the aeration tanks.
5. A large amount of suspended floc was observed in the clarifiers.
6. The clarifier had a large amount of accumulated solids in the weir troughs.
7. There was evidence of solids carryover from the clarifiers to the rapid sand filters.

8. Operation and maintenance activities should be documented in a bound and numbered log book. Loose sheets are not acceptable as the sole means of recording plant activities. Additionally, maintenance personnel shall include their arrival time, departure time, and initials with each entry.
9. Please provide information describing how often your operator, Mr. Paul Panic, is visiting the plant. Please note that pursuant to Ohio Administrative Code 3745-7-04, and Part II, A of the NPDES permit, the plant operator is to be at the site a minimum of three times a week for a total time of 1.5 hours.
10. Part II, K of the facility's NPDES permit requires that an outfall sign be erected at the outfall point by no later than four months from the effective date of the permit, which was October 1, 2009. No such sign was observed during the inspection. Please refer to the above-referenced part of the NPDES permit for specific instructions on the information that must be displayed on the sign.
11. Please keep a certified thermometer in the sample refrigerator to ensure samples are being properly refrigerated prior to analysis. Samples must be stored within a temperature range of 0° C - 6° C.
12. Corrosion was visible in the aeration tanks and associated piping.
13. Please provide documentation describing when the flow meter was last calibrated. Metering equipment should be calibrated on a yearly basis.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period October 2008 – February 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of non-compliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2008	001	00530	Total Suspended Solids	7D Conc	18	33.	10/8/2008
October 2008	001	00530	Total Suspended Solids	7D Qty	3.6	3.87206	10/8/2008
April 2009	001	00400	pH	1D Conc	6.5	6.3	4/29/2009
December 2008	001	00530	Total Suspended Solids	7D Conc	18	24.5	12/15/2008
June 2009	001	00530	Total Suspended Solids	7D Qty	3.6	6.65971	6/1/2009
June 2009	001	31616	Fecal Coliform	7D Conc	2000	65000.	6/1/2009
May 2009	001	31616	Fecal Coliform	7D Conc	2000	9990.	5/15/2009
April 2009	001	00400	pH	1D Conc	6.5	6.1	4/26/2009
June 2009	001	00530	Total Suspended Solids	7D Conc	18	41.4	6/1/2009
June 2009	001	00530	Total Suspended Solids	30D Qty	2.4	2.47066	6/1/2009
June 2009	001	31616	Fecal Coliform	7D Conc	2000	4000.	6/15/2009
December 2008	001	00400	pH	1D Conc	9.0	9.3	12/3/2008
June 2009	001	31616	Fecal Coliform	7D Conc	2000	25000.	6/8/2009
December 2009	001	00530	Total Suspended Solids	1D Conc	18	22.	12/8/2009
May 2009	001	31616	Fecal Coliform	7D Conc	2000	10000.	5/8/2009
May 2009	001	31616	Fecal Coliform	7D Conc	2000	6091.	5/22/2009
December 2009	001	00530	Total Suspended Solids	30D Conc	12	13.	12/1/2009
August 2010	001	00530	Total Suspended Solids	1D Conc	18	24.	8/9/2010
May 2011	001	00530	Total Suspended Solids	1D Conc	18	18.5	5/25/2011

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2009	001	00530	Total Suspended Solids	30D Conc	12	16.1	6/1/2009
June 2009	001	31616	Fecal Coliform	30D Conc	1000	18662.5	6/1/2009
October 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	7.4	8.76	10/1/2008
April 2009	001	00400	pH	1D Conc	6.5	6.1	4/24/2009
November 2009	001	00530	Total Suspended Solids	30D Conc	12	16.45	11/1/2009
November 2009	001	00530	Total Suspended Solids	1D Conc	18	27.3	11/17/2009

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00060*CD	May 2009	001	31616	Fecal Coliform			AK	5/4/2009

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
April 2009	001	00010	Water Temperature	1/Day	1	0	04/10/2009
January 2009	001	00400	pH	1/Week	1	0	01/15/2009
January 2009	001	00400	pH	1/Week	1	0	01/01/2009
January 2009	001	00400	pH	1/Week	1	0	01/22/2009
January 2009	001	00400	pH	1/Week	1	0	01/08/2009

Please be advised that failure to comply with the terms and conditions of the NPDES permit is subject to enforcement action pursuant to Ohio Revised Code, Chapter 6111. Please submit to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to address the above-referenced violations and deficiencies. Your response shall include specific dates for the initiation and completion of this action plan.

Should you have any questions or comments regarding this letter, please contact this office at 330-963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

enclosures: photographs



