



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 21, 2012

RE: ATB – HOLIDAY CAMPLANDS WWTP
ANDOVER TOWNSHIP, ASHTABULA CO.
OHIO EPA PERMIT 3PH00029*FD
COMPLIANCE EVALUATION INSPECTION

Mr. Lawrence J. Meaney, Director
Ashtabula County Department of Environmental Services
36 West Walnut Avenue
Jefferson, OH 44047

Dear Mr. Meaney:

On March 19, 2012, a site inspection was conducted at the above referenced facility at 4273 North Pymatuning Lake Road, Andover Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Mark Verzella represented Ashtabula County Department of Environmental Services (ACDES). 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. The last compliance inspection was conducted on March 10, 2011.

The system consists of screening grit removal, comminutor, influent pump station, flow equalization basin, aeration tanks, clarification, dual-unit rapid anthracite filtration, chlorination disinfection, dechlorination, and post disinfection aeration. Sludge management consists of sludge holding tanks, aerobic digestion and sludge drying beds. Dried sludge is hauled for disposal at a solid waste disposal facility. The facility discharges to Gravel Run Creek adjacent to the south side of the facility. Permanent generators maintained at the Holiday Camplands wastewater treatment plant (WWTP) provide backup power to the facility.

Observations

Following are observations made during the inspection:

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. The alarms were cycled and found in operating condition.
2. The facility is operated by Todd Bort of ACDES, who also operates the Ashcraft WWTP.
3. Screenings and grit are containerized for disposal at a solid waste landfill.

4. The influent sampler is maintained at the proper temperature and collects a time proportional sample.
5. All flow is diverted to a 50,000-gallon flow equalization basin. The blowers operate on a timer and were not on at the time of the inspection.
6. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming. Ferric Chloride is added to aid in phosphorus removal in warmer weather, but was not in operation at the time of the inspection. ACDES anticipates submitting a permit-to-install (PTI) for a flow splitter box and diffusers in 2012, and is awaiting preparation of engineering plans. Return sludge lines were in operating condition.
7. The surface of the clarifier was clear. The skimmer was functioning. ACDES replaced skimmer sprockets in 2011, and anticipates replacement of chains, guides, and boards in 2012. The effluent trough was in good condition and there was no scum around the effluent baffle or the trough. A small amount of float was observed on the clarifiers. Effluent channel were clean.
8. The up-flow anthracite filters were reasonably clean. The effluent discharged to the sand filters during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the media indicating that the beds were not clogged.
9. In 2011, ACDES reversed the sludge and backwash drying beds. The west bed is now used for filter backwash and the east bed is used for sludge drying. Sludge beds are used for sludge dewatering prior to being hauled to a landfill.
10. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample.
11. The chlorine contact tank was not chlorinating the effluent as it is outside the disinfection season. Chlorine gas is used as the primary disinfection, with sodium hypochlorite used as a backup disinfection system. ACDES anticipates submitting a PTI in 2011 for a UV disinfection system, and is currently awaiting preparation of engineering plans.
12. The WWTP laboratory performs monitoring of pH, temperature, dissolved oxygen, and screening for ammonia-nitrogen. ACDES contracts with Microbac Laboratories of Meadville, PA, remaining parameters and quality assurance samples from the WWTP laboratory.
13. Log books and the operation and maintenance manuals are maintained at the site and were available for inspection.
14. The final effluent was of acceptable visual quality, as observed in the last manhole along North Pymatuning Lake Road. The final outfall at the receiving stream is submerged.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2011 through February 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

Limit Violations

No effluent violations are noted for the time period reviewed.

Reporting Violations

No reporting frequency violations were noted for the time period reviewed, however the following reporting code violations are noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day			AB	9/16/2011
001	31616	Fecal Coliform			AB	9/9/2011
601	80082	CBOD 5 day			AB	9/16/2011

ACDES notified Ohio EPA that due to a failing air conditioner, the results from the September 16, 2011 CBOD and bacteria sampling was biased. As a reasonable explanation was provided, no additional information is needed to respond to the violation.

Other Violations

Composite Sampling: Part II, Item F of your permit requires all composite samples to be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the sewage flow rate at the time of sampling. ACDES has advised Ohio EPA that its influent sampler collects samples on a time-proportional basis instead of flow proportional. All composite samples must be flow-proportionate.

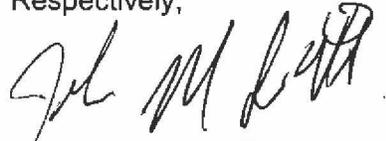
Compliance Schedule

Your new permit, effective January 1, 2011, contains the following milestones:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
1/1/2011	12/31/2015	7/1/2011	11/30/2011	95999	Other	E. Coli Status Report
1/1/2011	12/31/2015	10/1/2011	N/A	-----	Other	Submit PTI if Needed
1/1/2011	12/31/2015	7/1/2011	11/30/2011	95999	Other	E. Coli Status Report
1/1/2011	12/31/2015	1/1/2012	11/30/2011	05699	Other	Achieve Final Limits
1/1/2011	12/31/2015	7/1/2011	1/31/2011	-----	Other	Evaluate Unsanitary Conditions
1/1/2011	12/31/2015	1/1/2012	N/A	-----	Plans	Submit detail Plans if Needed
1/1/2011	12/31/2015	7/1/2012	N/A	-----	Construction	Advertise for Bids if Needed
1/1/2011	12/31/2015	7/1/2013	N/A	-----	Construction	Complete Construction
1/1/2011	12/31/2015	7/1/2013	N/A	-----	Construction	Achieve Final Limits

Although all milestones were met, some milestones were not met by the date prescribed in your permit. ACDES is reminded of its obligations to submit required information by the assigned milestones as prescribed by your NPDES permit. If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,

A handwritten signature in black ink, appearing to read "John M. Schmidt". The signature is written in a cursive style with a large initial "J" and "S".

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

JMS/cs

File: Municipal/ASH Holiday Camplands WWTP (Ashtabula Co.)/PC