



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 30, 2012

RE: GRAND VALLEY CONSERVATION CENTER
NPDES PERMIT NO. 3PR00547
ROME TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Mark Schmaltz, Director of Operations
The Nature Conservancy in Ohio
6375 Riverside Drive, Suite 100
Dublin, OH 43017

Dear Mr. Seidel:

On April 26, 2012, a site inspection was conducted at the above referenced facility at 3973-4152 Callender Road, Rome Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, with Karen Adair and Nathan Randolph representing the Nature Conservancy in Ohio (NCO). 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 November 19, 2010.

The collection system consists of a gravity system receiving both domestic sewage and backwash water from the camp's water treatment system. The treatment system consists of a 2,500-gallon trash trap, 20,000-gallon extended aeration plant with clarification, dosing tank, 1,680 square foot surface sand filtration, and a 2,400-gallon chlorine disinfection tank with tablet chlorinator. The facility does not have dechlorination. Sludge management of sludge removal from an aerated sludge tank when needed to another publicly owned treatment works (POTW), or there are provisions for dewatering sludge on sludge drying beds. The facility discharges to an unnamed tributary of the Grand River adjacent to the south to southwest side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

NCO has advised Ohio EPA that it wishes to replace the package wastewater treatment plant with an onsite treatment system, and has retained the services of David Rapp. NCO will need to continue to operate the plant and file data as required by its NPDES permit until the permit is terminated.

Observations and Notations

1. The plant is operated by Steve Howe, Charles Newman, and Donald Velsick of Ake Environmental on behalf of the Grand Valley Conservation Center AS OF April 23, 2012.
2. Ohio EPA could not locate a copy of the facility log book or contract with a contract operator. These documents must be maintained at the site and available for inspection by Ohio EPA or emergency personnel on a 24-hour basis.

3. The content of the aeration tank had an earthy odor, light brown color with good mixing and no foam present. The blowers and alarms were cycled and found in operating condition. The blowers were running and the plant was receiving sufficient aeration. The color and odor are typical for the aeration tank that is biologically under loaded.
4. The surface of the clarifier was clear. Effluent channels were observed in good condition. The skimmer was found in operating condition, and the return sludge lines were observed as operating properly.
5. The sand filter dosing pumps and alarms were cycled and only one pump (Pump 2) was found in operating condition. The water discharged to the sand filters during the cycling operation was observed as clear.
6. Surface sand filters had a significant accumulation of vegetation that must be removed.
7. The disinfection system was observed as operating. Prior to May 1, 2012, NCO should monitor chlorine residuals and if excess chlorine residuals are found that could exceed levels specified in your permit, NCO must install a tablet dechlorinator to control excess chlorine residuals.
8. The final discharge pipe at the tributary to the Grand River was observed of acceptable visual quality.
9. Ake Environmental is the designated operator of record for this facility. Ake Environmental observes the plant, makes adjustments as necessary, and performs routine monitoring of the plant, collects and analyzes samples. Once data is collected data will be reported by Ake on behalf of NCO commencing in May on the electronic discharge monitoring reports (eDMRs).
10. An outfall sign was posted at our final outfall in a follow up notification on April 27, 2012.

NPDES Permit Compliance Review

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

Limit Violations

No limit violations were noted for the time period reviewed.

Reporting Violations

No reporting code or reporting frequency violations were noted for the reporting period reviewed; but Ohio EPA notes that no eDMR was submitted for the months of December, January, February, or March. Each report was due to be submitted by 20th of the following month (i.e. the March eDMR was due April 20th). Quarterly sampling was due to be collected in the month of December.

Compliance Schedule

Your current NPDES permit does not contain a compliance schedule.

Other Violations

1. Failure to Maintain a Facility Log Book: The inspection revealed that records required pursuant to Ohio Administrative Code (OAC) 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. A log book must be maintained at the WWTP and available for inspection 24 hours a day. This is typically accomplished by posting a mailbox or some other weather-tight container at the WWTP.
2. Minimum Staffing Requirements: Based upon a lack of a log book to document visits by your Operator of Record Certification (ORC), Grand Valley Conservation Center is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements. The facility must be staffed by a licensed operator twice weekly for a total of an hour.
3. Failure to Report Monitoring Data: Part III, Item 4 of your NPDES permit requires you to report data to Ohio EPA electronically. A review of Ohio EPA files finds no data reported for the months of December 2011 through March 2012. This information must be submitted as soon as possible. Instructions for establishing an eDMR account to submit data may be found under Part II, Item 4 of your NPDES permit on page 12.
4. Annual Sludge Report: Ohio EPA notes that Part II, Item J of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report was received on April 27, 2012.
5. Outfall Signage: Ohio EPA notes that Part II, Item K of your NPDES permit requires you to post a sign at your outfall along the unnamed tributary to the Grand River. This sign should have been posted by March 31, 2012 and was actually posted on April 25, 2012.

If you have any questions or comments regarding this inspection, 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

cc: Steven Howe, Ake Environmental

File: SP/Ashtabula/Rome Twp./Grand Valley Conservation Center (3PR00547)