



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

May 30, 2012

Geoffrey W. Burns, Site Manager  
Geneva Hills Center WWTP  
1380 Blue Valley Road, SE  
Lancaster, OH 43130

**Re: Geneva Hills Center WWTP  
NPDES Permit 4PR00094/ OH0124192  
Compliance Evaluation Inspection  
Fairfield County  
Notice of Violation**

Dear Mr. Burns:

On May 22, 2012, a Compliance Evaluation Inspection was conducted at the Geneva Hills Center WWTP. Present for the inspection were Gary Bennett, Contract Operator representing Geneva Hills and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The following problems and deficiencies are of concern at this facility:

- Item Number 9 of the Director's Final Findings and Orders (DFFOs, effective November 21, 2011) has yet to be fulfilled by the facility. There are still several missing data reports from past months, although the facility has been submitting reports since February 2012, in a timely fashion. Missing data reports are listed in the attached inspection report. These missing reports must be submitted or reported as no discharge for the month in question (e.g., December 2011 sludge report 588) by the date listed below.
- NPDES permit violations continue to plague the facility (Item 11 in the DFFOs). The permittee has not been notifying the inspector as required in the permit. The plant operator or owner must notify Paul Vandermeer immediately upon the discovery of such violations.

- The violations of TSS limits in the NPDES permit may be due to difficulty posed at the sampling location at the mouth of the wetland when materials are stirred up during collection of samples. Mr. Bennett and I discussed a solution to this problem that the facility may wish to implement. Please discuss this with the operator and provide Paul Vandermeer with the details of the decision by the date listed below.
  
- Intermittent flows and loadings to the WWTP are problematic and the cause of some of the permit limit violations. The facility has proposed to investigate installing a non-discharging system to treat wastewater generated on site. Please keep Paul Vandermeer apprised of the progress of this investigation. Should the facility decide to install such a system, a permit to install must be submitted to Ohio EPA for review.

Please submit the information requested in the bullet items above to Paul Vandermeer by June 22, 2012. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely,



Paul L. Vandermeer  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

c: Gary Bennett, TCCI

ec: Paul L. Vandermeer

**NPDES Compliance Inspection Report**

**SECTION A: NATIONAL DATA SYSTEM CODING**

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PR00094	OH0124192	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/22/2012	10:20 AM	11:00 AM	Yes	Yes

**SECTION B: FACILITY DATA**

Name and Location of Facility Inspected	Permit Effective Date
Geneva Hills Center WWTP 1380 Blue Valley Rd. SE Lancaster, OH 43130	11/1/2008
	Permit Expiration Date
	10/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Gary Bennett, Contract Operator	(800) 686-3519
Name and Title of Responsible Official	Phone Number
Geoffrey W. Burns, Site Manager	(740) 746-8439

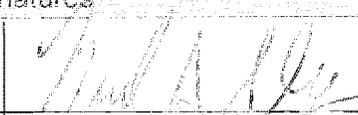
**SECTION C: AREAS EVALUATED DURING INSPECTION**

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

U	NPDES Compliance	
M	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
U	Flow Measurement	Submit proof of calibration by 6/22/2012
S	Receiving Waters	
S	Laboratory	

Comments:

Signatures

 5/30/12	 5/30/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office

## Compliance Data for Geneva Hills Center WWTP between 7/1/2009 to 5/1/2012

### Summary

Permit Effluent Limit Violations: 30  
 Permit Effluent Code Violations: 1  
 Permit Effluent Frequency Violations: 8  
 Compliance Schedule Violations: 0

Permit	Permit Period	Parameter	Limit	Unit	Value	Unit	Date
	July 2009	Total Suspended Solids	30D Conc	12	13.		7/1/2009
	August 2009	Total Suspended Solids	30D Conc	12	15.		8/1/2009
	September 2009	Total Suspended Solids	30D Conc	12	15.		9/1/2009
	December 2009	Total Suspended Solids	30D Conc	12	72.		12/1/2009
	December 2009	Total Suspended Solids	7D Conc	18	139.		12/8/2009
	January 2010	Total Suspended Solids	30D Conc	12	13.		1/1/2010
	May 2010	Total Suspended Solids	30D Conc	12	15.		5/1/2010
	July 2010	Total Suspended Solids	30D Conc	12	25.		7/1/2010
	July 2010	Total Suspended Solids	7D Conc	18	25.		7/8/2010
	July 2010	Dissolved Oxygen	1D Conc	6.0	2.31		7/9/2010
	August 2010	CBOD 5 day	30D Conc	10	17.5		8/1/2010
	August 2010	Dissolved Oxygen	1D Conc	6.0	5.06		8/6/2010
	August 2010	CBOD 5 day	7D Conc	15	33.8		8/15/2010
	September 2010	Total Suspended Solids	30D Conc	12	26.		9/1/2010
	September 2010	Total Suspended Solids	7D Conc	18	26.		9/1/2010
	September 2010	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.965		9/1/2010
	September 2010	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.965		9/1/2010
	October 2010	Total Suspended Solids	30D Conc	12	46.		10/1/2010
	October 2010	Total Suspended Solids	7D Conc	18	75.		10/15/2010
	November 2010	Total Suspended Solids	30D Conc	12	285.		11/1/2010
	November 2010	Total Suspended Solids	30D Qty	0.32	.32362		11/1/2010
	November 2010	Total Suspended Solids	7D Conc	18	285.		11/15/2010
	June 2011	Total Suspended Solids	30D Conc	12	17.		6/1/2011
	July 2011	Total Suspended Solids	30D Conc	12	103.		7/1/2011
	July 2011	Total Suspended Solids	7D Conc	18	103.		7/1/2011
	September 2011	Total Suspended Solids	30D Conc	12	58.		9/1/2011
	September 2011	Total Suspended Solids	7D Conc	18	58.		9/1/2011
	March 2012	Total Suspended Solids	30D Conc	12	22.6666		3/1/2012
	March 2012	Total Suspended Solids	7D Conc	18	34.		3/1/2012
	March 2012	Total Suspended Solids	7D Conc	18	27.		3/15/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
July 2011	001	Dissolved Oxygen	AB	7/6/2011

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	violation Date
April 2010	001	Total Suspended Solids	1/Month	1	0	04/01/2010
April 2010	001	Nitrogen, Ammonia (NH3)	1/Month	1	0	04/01/2010
April 2010	001	CBOD 5 day	1/Month	1	0	04/01/2010
August 2009	001	Dissolved Oxygen	1/Week	1	0	08/01/2009
August 2010	001	Dissolved Oxygen	1/Week	1	0	08/08/2010
September 2009	001	Dissolved Oxygen	1/Week	1	0	09/08/2009
October 2010	001	Dissolved Oxygen	1/Week	1	0	10/01/2010
October 2009	001	Dissolved Oxygen	1/Week	1	0	10/08/2009

The facility has 5 missing discharge monitoring reports (DMRs)

Station	Required Report Period	DMR Received
001	June 2010	No
001	November 2011	No
001	December 2011	No
588	December 2011	No
001	January 2012	No

### Flow Data for Geneva Hills Center WWTP between 7/1/2009 and 5/1/2012

	Date	Flows (GPD)
Ten Highest Flows	7/3/2009	660
	7/1/2009	620
	7/2/2009	620
	7/19/2009	600
	2/27/2012	586
	2/3/2012	582
	2/4/2012	582
	2/5/2012	582
	2/6/2012	582
	2/7/2012	582
<b>Average Flow Rate</b>		<b>309</b>

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Products and production rates conform with permit application..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application ..... Y
- (f) New treatment process added since last inspection ..... N
- (g) Notification given to State of new, different or increased discharges ..... NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments:

**SECTION E: COMPLIANCE**

- (a) Any significant violations since the last inspection ..... Y\*
- (b) Permittee is taking actions to resolve violations..... Y\*
- (c) Permittee has a compliance schedule ..... N\*
- (d) Permittee is meeting compliance schedule..... N\*

Comments: \*Facility has agreed to abide by Director's Final Findings and Orders effective November 21, 2011. Items 9 and 11 on page 9 have not yet been met.

**SECTION F: OPERATION AND MAINTENANCE**

- (a) Standby power available ..... N  
If yes, what type?
- (b) Adequate alarm system available for power or equipment failures ..... N
- (c) All treatment units in service other than backup units ..... Y
- (d) Wastewater Treatment Works classification ..... I
- (e) Operator of Record holds unexpired license of class required by Permit ..... Y  
Class held: I
- (f) Copy of certificate of Operator of Record displayed on-site ..... NA\*
- (g) Minimum operator staffing requirements fulfilled ..... Y
- (h) Routine and preventative maintenance scheduled and performed ..... Y^
- (i) Any major equipment breakdown since last inspection ..... N
- (j) Operation and maintenance manual provided and maintained ..... NA
- (k) Any plant bypasses since last inspection ..... N
- (l) Regulatory agency notified of bypasses ..... NA  
By MOR  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection ..... N

Comments: \*There is no place to display the certificate. ^Plant is running better now that there is a certified operator overseeing the WWTP.

**SECTION G: RECORD KEEPING**

- a) Log book provided ..... Y
- b) Format of log book *hard bound book*
- c) Log book(s) kept onsite in an area protected from weather ..... N\*
- d) Log book contains the following:
  - i) Identification of treatment works ..... Y
  - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
  - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
  - iv) Laboratory results (unless documented on bench sheets)..... Y
  - v) Identification of person making log entries..... Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... N^

Comments: \*Operator keeps book with him in vehicle. He will install a protected box to allow for storage of the book onsite. Please send a photograph of the installed storage box to Paul Vandermeer via e-mail by June 22, 2012. ^The owner or operator shall notify Paul Vandermeer immediately upon the discovery of an effluent limit or other violation of the NPDES permit.

**SECTION H: COLLECTION SYSTEM**

- a) Percent combined system:..... 0%
- b) Any collection system overflows since last inspection ..... N  
     CSO    SSO
- c) Regulatory agency notified of overflows ..... NA
- d) CSO O&M plan provided and implemented ..... NA
- e) CSOs monitored and reported in accordance with permit..... NA
- f) Portable pumps are used to relieve system ..... NA
- g) Lift station alarms provided and maintained..... NA
- h) Lift stations equipped with permanent standby power or equivalent ..... NA
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection. .... N
- j) Any complaints received since last inspection of basement flooding ..... NA
- k) Are any portions of the sewer system at or near capacity..... N
- l) Are operations changed during high-flow events? ..... N

Comments:

**SECTION I: SLUDGE MANAGEMENT**

- a) Sludge adequately disposed..... NA\*  
     Method:

- b) If sludge is incinerated, where is ash disposed of..... NA
- c) Is sludge disposal contracted..... NA\*  
Name:
- d) Has amount of sludge generated changed significantly..... N
- e) Adequate sludge storage provided at plant..... N
- f) Records kept in accordance with State and Federal law ..... NA\*
- g) Any complaints received last year regarding sludge..... NA\*
- h) Is sludge adequately processed (digestion, pathogen control) ..... NA\*

Comments: \*Facility is not generating excess sludge due to intermittent and low flows to the WWTP.

**SECTION J: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained..... Y  
Type of device: *Ultrasonic* Device location: *at effluent pump weir*
- b) Calibration frequency adequate ..... N\*  
Date of last calibration: *Unknown*
- c) Secondary instruments operated and maintained..... NA
- d) Flow measurements equipment adequate to handle full range of flows.... Y
- e) Actual flow discharged is measured..... Y
- f) Flow measuring equipment inspection frequency ..... 3X/wk
- g) Sampling location(s) are as specified by permit..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)..... NE

Comments: \*Facility shall contract with an outside source to calibrate the ultrasonic flow meter and submit proof of calibration to Paul Vandermeer by June 22, 2012. In the future, this calibration must be performed on an annual basis.

**SECTION K: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3)..... Y
- b) If alternate procedures are used, are they properly approved? ..... NA
- c) Analysis performed more frequency ..... Y  
If yes, are results recorded in permittee's report? ..... Y
- d) Commercial laboratory used:  
Name: *TCCI Laboratory*  
Parameters analyzed: *All*
- e) Quality assurance manual provided and maintained ..... NA
- f) Calibration and maintenance of instruments is satisfactory? ..... Y\*

Comments: \*TCCI calibrates instruments satisfactorily.

**SECTION L: EFFLUENT RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	None	None	None	None	None	Clear	Iron*

Comments: There is a significant amount of precipitated iron at the outfall point. This may be stirred up during sampling possibly causing permit limit violations for TSS. The facility operator has proposed taking some action to deal with this problem by installing a small vertical pipe at the outfall to create a pool for sampling.

**SECTION M: MULTIMEDIA OBSERVATIONS**

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories ..... N
- b) Do you notice staining or discoloration of soils, pavement or floors ..... N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
- e) Do you notice any unusual odors or strong chemical smells ..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: