



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 10, 2012

RE: ODNR PYMATUNING STATE PARK
NPDES PERMIT NO. 3PP00013
ANDOVER TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Craig Morton, Park Manager
Ohio Department of Natural Resources
Pymatuning State Park
P.O. Box 1000
Andover, OH 44003

Dear Mr. Morton:

On July 5, 2012, a site inspection was conducted at the above referenced facility on South Pymatuning Lake Road, Andover Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Troy Orahood and Teresa Sasala represented the Ohio Department of Natural Resources (ODNR). 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 inspections were conducted on May 5, 2011 and July 7, 2011.

There are two wastewater treatment facilities that serve the state park, one known as the Campground wastewater treatment plant (WWTP) and the other known as the Beach/Marina WWTP. Each system consists of a trash trap/comminutor (muffin monster), extended aeration tanks, clarification, surface sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management of sludge removal from aerated sludge tanks when needed to another publicly owned treatment works (POTW). The Campground WWTP discharges to Pymatuning Reservoir (Shenango River) adjacent to the east side of the facility approximately two miles south of State Route 85. The Beach / Marina WWTP discharges to Pymatuning Reservoir (Shenango River) adjacent to the west side of the facility near State Route 85. No backup power is provided to the facility, but the facility is provided with alarms.

Observations and Notations

Following are observations and notations made during the inspection:

Campground WWTP

1. The design flow of the extended aeration plant is 80,000 gallons per day. Both sides of the plant were operating at the time of the inspection. Ohio EPA notes that the plant has still not been wired for backup power and provisions made to provide backup power in the event that it is needed. In the past, this plant has gone septic from prolonged power outages, resulting in partially treated sewage discharged to Pymatuning Lake.
2. The collection system for this WWTP consists of gravity sewers and three large pump stations, three medium pump stations, and two small pump stations. The pump stations appear to be in working order at the time of the inspection.

3. As of July 4, 2012, the primary plant operator is Troy Orahood, with the secondary plant operator designated as Kenneth Griffith. Both Mr. Orahood and Mr. Griffith are ODNR employees.
4. Log books and the operation and maintenance manual are maintained both at the Campground WWTP and at the water treatment plant laboratory and were available for inspection. The logs were inspected and found compliant with Ohio Administrative Code (OAC) 3745-7-09.
5. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash was containerized for disposal at a solid waste landfill.
6. The influent sampler (Sigma) is maintained at the proper temperature and collects a time proportional sample. This sampler is used for internal process control samples only. The sampler was empty, as a sample had just been pulled. A thermometer should be maintained in the sample storage area of the unit to verify that the correct temperature is being maintained.
7. The flow equalization tank was found in operating condition, providing good aeration and mixing. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
8. The content of the aeration tank had a chocolate brown color and good mixing. Sludge returns were also a chocolate brown color with no foaming. The skimmers were functioning properly and returning a clear discharge. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
9. The surface of the clarifier was clear, reasonably clear of scum. Effluent channels, weirs and sidewalls of the east clarifier were clean. Weirs and effluent channels are scrubbed several days a week.
10. The sand filter dosing tanks were observed in operable condition. Blowers were cycled and found in operable condition. The alarms were tested and found in operating condition.
11. Surface sand filters in operation were reasonably clean and operable. Some filters that are currently out of service must have accumulated weeds removed prior to placing into service. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. ODNR maintains two sets of flow dissipation pads for the sand filters. The wastewater percolated freely through the sand indicating that the beds were not clogged.
12. The final effluent sampler (Sigma) is maintained at the proper temperature and collects a time proportional sample. The sampler was empty as a sample had just been pulled upon arrival. A thermometer should be maintained in the sample storage area of the unit to verify that the correct temperature is being maintained. This sampler must be upgraded to collect a flow proportional sample per Part II, Item F of your NPDES permit.

13. The disinfection system was found stocked with the appropriate chemicals. ODNR feeds sodium hypochlorite and uses dechlorination tablets to remove excess chlorine residual.
14. The final effluent was clear as observed at the final tank outlet between the plant and the final outfall. The final discharge (Outfall 001) at the unnamed tributary to Pymatuning Reservoir was observed in acceptable visual quality. No sludge or algal growth was noted at the final discharge.
15. Samples are collected by Mr. Orahood, Mr. Griffith, or Ms. Sasala, who also perform on-site analysis of pH and DO and perform observations of flow, color, odor, and turbidity.
16. Alloway Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
17. Prior to July 4, 2012, Mr. Griffith submitted the data to Ohio EPA's electronic discharge monitoring report (eDMR) system. As of July 4, 2012, Mr. Orahood assumed these duties.

Beach/Marina WWTP

18. The design flow of the extended aeration plant is 15,000 gallons per day. The beach/marina portion of the park was closed from October 2011 through May 2012. The plant was reseeded prior to startup.
19. Log books and the operation and maintenance manual are maintained both at the Marina WWTP and at the water treatment plant laboratory and were available for inspection. The logs were inspected and found compliant with OAC 3745-7-09, with the exception of page numbering. All pages in the log book must be sequentially numbered,
20. As of July 4, 2012, the primary plant operator is Troy Orahood, with the secondary plant operator designated as Kenneth Griffith. Both Mr. Orahood and Mr. Griffith are ODNR employees.
21. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept.
22. The wet well blower was operating.
23. The content of the aeration tank was a medium to light brown color with good aeration and no odor. Blowers and alarms were cycled and found in operating condition. Return lines were operating. Ohio EPA notes that the distribution of air is uneven between the east and west tanks. This may be due either to clogged lines/diffusers, or incorrect valve settings. The air distribution must be adjusted. The plant is biologically under-loaded.
24. The surface of the final clarifiers was clear and the sides appear to be scraped, with clean effluent channels and weirs. The skimmer was working.

25. The dosing pumps and alarms were cycled and found in operating condition. The hour-meter for Pump 1 was not functional and must be repaired.
26. Surface sand filters were clean and raked. The effluent discharged to the sand filter was observed as clear, with water percolating through the beds. The walls of the sand filters should be inspected and grouted and sealed as necessary.
27. The disinfection system was found to be stocked with the appropriate chemicals and clean.
28. The final effluent at the disinfection tank outlet was observed as of acceptable visual quality. The final outfall to Pymatuning Reservoir was observed as 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 April 1, 2011 through June 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	18.7	7/1/2011
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.61	2.14462	7/1/2011
001	00610	Nitrogen, Ammonia (NH3	1D Conc	3.0	18.7	7/7/2011
001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.91	2.14462	7/7/2011
002	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	6.31	8/1/2011
002	00610	Nitrogen, Ammonia (NH3	1D Conc	3.0	6.31	8/11/2011
002	80082	CBOD 5 day	1D Conc	15	20.	9/1/2011
002	80082	CBOD 5 day	30D Conc	10	20.	9/1/2011
001	00530	Total Suspended Solids	1D Qty	5.5	5.67182	1/5/2012

Part III, Item 12 of your NPDES permit requires prompt notification for noncompliance. ODNR must provide an explanation for these violations, along with measure to ensure that they are not repeated.

Reporting Violations

The following reporting code violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen			AB	4/17/2011
001	00400	pH			AB	4/17/2011

Reporting code violations must be explained, along with measures to ensure that they are not repeated.

The following reporting frequency violations were noted for the period reviewed:

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00610	Nitrogen, Ammonia (NH3	1/2Weeks	1	0	07/15/2011
001	31616	Fecal Coliform	1/Month	1	0	07/01/2011
001	00530	Total Suspended Solids	1/Week	1	0	11/22/2011
001	80082	CBOD 5 day	1/Week	1	0	11/22/2011
001	00610	Nitrogen, Ammonia (NH3	1/2Weeks	1	0	12/15/2011
002	00010	Water Temperature	1/Week	1	0	05/01/2011
002	00010	Water Temperature	1/Week	1	0	05/08/2011
002	00083	Color, Severity	1/Day	1	0	05/01/2011
002	00083	Color, Severity	1/Day	1	0	05/02/2011
002	00083	Color, Severity	1/Day	1	0	05/03/2011
002	00083	Color, Severity	1/Day	1	0	05/04/2011
002	00083	Color, Severity	1/Day	1	0	05/05/2011
002	00083	Color, Severity	1/Day	1	0	05/06/2011
002	00083	Color, Severity	1/Day	1	0	05/07/2011
002	00083	Color, Severity	1/Day	1	0	05/08/2011
002	00083	Color, Severity	1/Day	1	0	05/09/2011
002	00083	Color, Severity	1/Day	1	0	05/10/2011
002	00083	Color, Severity	1/Day	1	0	05/11/2011
002	00083	Color, Severity	1/Day	1	0	05/12/2011
002	00083	Color, Severity	1/Day	1	0	05/13/2011
002	00083	Color, Severity	1/Day	1	0	05/14/2011
002	00083	Color, Severity	1/Day	1	0	05/15/2011
002	00083	Color, Severity	1/Day	1	0	05/16/2011
002	01330	Odor, Severity	1/Day	1	0	05/01/2011
002	01330	Odor, Severity	1/Day	1	0	05/02/2011
002	01330	Odor, Severity	1/Day	1	0	05/03/2011
002	01330	Odor, Severity	1/Day	1	0	05/04/2011
002	01330	Odor, Severity	1/Day	1	0	05/05/2011
002	01330	Odor, Severity	1/Day	1	0	05/06/2011
002	01330	Odor, Severity	1/Day	1	0	05/07/2011
002	01330	Odor, Severity	1/Day	1	0	05/08/2011
002	01330	Odor, Severity	1/Day	1	0	05/09/2011
002	01330	Odor, Severity	1/Day	1	0	05/10/2011
002	01330	Odor, Severity	1/Day	1	0	05/11/2011
002	01330	Odor, Severity	1/Day	1	0	05/12/2011
002	01330	Odor, Severity	1/Day	1	0	05/13/2011
002	01330	Odor, Severity	1/Day	1	0	05/14/2011
002	01330	Odor, Severity	1/Day	1	0	05/15/2011
002	01330	Odor, Severity	1/Day	1	0	05/16/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/01/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/02/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/03/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/04/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/05/2011

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002	01350	Turbidity, Severity	1/Day	1	0	05/06/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/07/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/08/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/09/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/10/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/11/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/12/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/13/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/14/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/15/2011
002	01350	Turbidity, Severity	1/Day	1	0	05/16/2011
002	50050	Flow Rate	1/Day	1	0	05/01/2011
002	50050	Flow Rate	1/Day	1	0	05/02/2011
002	50050	Flow Rate	1/Day	1	0	05/03/2011
002	50050	Flow Rate	1/Day	1	0	05/04/2011
002	50050	Flow Rate	1/Day	1	0	05/05/2011
002	50050	Flow Rate	1/Day	1	0	05/06/2011
002	50050	Flow Rate	1/Day	1	0	05/07/2011
002	50050	Flow Rate	1/Day	1	0	05/08/2011
002	50050	Flow Rate	1/Day	1	0	05/09/2011
002	50050	Flow Rate	1/Day	1	0	05/10/2011
002	50050	Flow Rate	1/Day	1	0	05/11/2011
002	50050	Flow Rate	1/Day	1	0	05/12/2011
002	50050	Flow Rate	1/Day	1	0	05/13/2011
002	50050	Flow Rate	1/Day	1	0	05/14/2011
002	50050	Flow Rate	1/Day	1	0	05/15/2011
002	50050	Flow Rate	1/Day	1	0	05/16/2011
002	50060	Chlorine, Total Residual	1/2Weeks	1	0	05/01/2011
002	00300	Dissolved Oxygen	1/Week	1	0	05/01/2011
002	00300	Dissolved Oxygen	1/Week	1	0	05/08/2011
002	31616	Fecal Coliform	1/Month	1	0	07/01/2011

Reporting frequency violations must be explained, along with measures to ensure that they are not repeated. Many of these apparent reporting violations occurred in May 2011 and may have been due to the plant not operating yet. Dates should be checked and if the plant was not operating on the date(s) listed, the appropriate "AL" code should be used for no flow that day and a revised May 2011 eDMR report submitted. eDMR records must be amended to reflect accurate reporting.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule

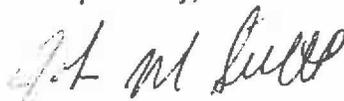
Your NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
4/01/2012	3/31/2017	12/01/2012	Incomplete	95999	Report	E. Coli Status Report
4/01/2012	3/31/2017	01/01/2013	Incomplete	———	Construction	Disinfection PTI if needed
4/01/2012	3/31/2017	06/01/2013	Incomplete	05699	Construction	Achieve E Coli Final Limits
4/01/2012	3/31/2017	12/01/2012	Incomplete	95999	Report	Ammonia Status Report
4/01/2012	3/31/2017	01/01/2013	Incomplete	———	Construction	Ammonia PTI if Needed
4/01/2012	3/31/2017	06/01/2013	Incomplete	05699	Construction	Achieve Ammonia Limits

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 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: Troy Orahoad, ODNR, Pymatuning State Park
Michael Blakeman, ODNR Punderson State Park

File: SP/Ashtabula/Andover Twp./ODNR Pymatuning State Park (3PP00013)