



**Environmental  
Protection Agency**

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

October 22, 2012

RE: GENEVA ON THE LAKE VILLAGE WWTP  
GENEVA-ON-THE-LAKE, ASHTABULA CO  
OHIO EPA PERMIT 3PC00020  
COMPLIANCE EVALUATION INSPECTION

Honorable David Nelson, Mayor  
James Hockaday, Village Administer  
Village of Geneva-on-the-Lake  
4929 South Warner Drive  
Geneva-on-the-Lake, OH 44041

Dear Mayor Nelson and Mr. Hockaday:

On September 12, 2012, a site inspection was conducted at the above referenced facility at 4843 North Broadway (State Route 534), Geneva-on-the-Lake Village, Ashtabula County. The inspection was conducted by John Schmidt and Jon Jamison of this office, and Victor Quinones, Wastewater Superintendent, represented the Village of Geneva-on-the-Lake (GOTL) during the inspection. 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, and in conjunction with the renewal of that permit. The last compliance inspection was conducted on December 29, 2011.

The system consists of a emergency retention basin (equalization tank), preliminary treatment consisting of bar screens and manual grit removal, a 20,000 gallon raw sewage pump station, a 415,000 gpd dual-unit contact-stabilization activated sludge treatment process, final settling tanks, chlorine disinfection, and sodium bisulfate dechlorination. Sodium bisulfate is fed for chlorine residual control. Sludge management consists of aerobic digestion and settling tanks, with dewatering on sludge drying beds prior to August 2012, and dewatering through a small sludge press since August 2012, with the filtrate routed through one of the former sludge beds. Geneva-on-the-Lake has the option of either land application or hauling the sludge to a landfill through its NPDES permit. Prior to 2009, sludge was land applied to a farmer's field as Class B sludge in Austinburg Township. Since 2009, sludge is hauled to a sanitary landfill in Geneva Township. The facility discharges a sewer along State Route 531 to the east of the plant, which then flows to Lake Erie to the north of the facility. Generators provide backup power to the entire facility.

The plant has a bypass from the former Imhoff tanks converted into an equalization tank. Since June 2012, chlorine disinfection and sodium bisulfite dechlorination has been added to bypass flows. The bypass is blended with the final effluent prior to Outfall 001. Outfall 001 is located downstream of both the final plant discharge and Outfall 602.

**Observations and Notations**

1. Victor Quinones, Wastewater Superintendent, is identified as the operator of record for this facility. Mr. Quinones is the only licensed operator for the facility, with wastewater staff working under Mr. Quinones not licensed as operators by the State of Ohio.

2. Copies of the facility log books, permit, and operations and maintenance manuals were available for inspection. The documentation was found not compliant with Ohio Administrative Code (OAC) 3745-7-09. Specifically, the log book was last written in on September 28, 2012. Other plant operating data are maintained on loose-leaf sheets. Discussions with Mr. Quinones indicates that he was on vacation from September 29, 2012 through October 7, 2012, and that while GOTL street department personnel checked on the operation of the plant, these personnel were not licensed operators. The plant must be staffed by a licensed operator for the minimum staffing requirements of 20 hours per week. Any plant operating data not represented by laboratory bench sheets must be written in the log book. The wastewater treatment plant (WWTP) log must be contained in a bound document with sequentially numbered sheets.
3. Influent and effluent monitoring time proportional composite samplers were retrofitted to monitor on a flow-proportional basis in June 2011. The effluent sampler was replaced with a new model on October 10, 2012, and is currently collecting time-proportional samples. Parts are on order to make the new sampler a flow proportional sampler, and are expected by November 8, 2012. Samples are maintained at the proper temperature. It is recommended that a thermometer be maintained in a jar with water in the sample refrigerator rather than relying upon a thermometer that measures air temperature.
4. Screenings and grit are containerized for disposal at a solid waste landfill. The bar screen and comminutor were noted in operating condition.
5. New flow meters and totalizers were installed in phases between mid-April and completed on June 7, 2011.
6. The east plant was taken out of service and is currently undergoing annual maintenance. The west plant was operating at the time of the inspection.
7. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming.
8. The surface of the clarifier was clear. The effluent trough was reasonably clean and there was no scum around the effluent baffle or the trough. Effluent channels and weirs are scrubbed weekly.
9. Disinfection system improvements are currently being installed, implementing a PTI approved by Ohio EPA on May 3, 2012. Chlorine and sodium bisulfide are being manually metered into the system pending completion of electrical work. Electrical work is expected to be completed by December 31, 2012.
10. The chlorine contact tank has new peristaltic feed pumps for better chlorine control installed the fall of 2009. The configuration of the chlorine contact tanks pose a concern for short circuiting of the flow and not providing the proper disinfection contact time. GOTL has added air lines to the disinfection tank implementing the May 3, 2012 PTI.

11. Sludge handling since August 2012 includes processing sludge through a sludge press and discharging the filtrate to one of the sludge drying beds, where additional solids are removed. The sludge drying beds discharge to the headworks of the plant. A 4-inch drain packed in gravel has been installed around the perimeter of the beds to divert surface water to the storm water system.
12. The WWTP laboratory performs monitoring of pH, temperature, dissolved oxygen, chlorine residual, and total suspended solids (sludge only). Geneva-on-the-Lake contracts with Northcoast Laboratories for BOD, suspended solids (plant flows), ammonia-nitrogen, phosphorus, metals, oil and grease, nitrate-nitrite, bacteria, and quality assurance samples from the WWTP laboratory.
13. The final effluent at the outlet to Lake Erie could not be observed due to the outlet being submerged. During the inspection, I observed an open manhole at the facility immediately upstream of Outfall 001 and the final discharge appeared to be 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 December 1, 2011 through October 1, 2012 indicates noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	8.5	12/1/2011
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00002	12/1/2011
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	2.9	3/1/2012
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00001	3/1/2012
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	6.8	6/1/2012
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00001	6/1/2012
001	00530	Total Suspended Solids	7D Conc	45	68.5	8/1/2012
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	15.3	8/1/2012
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00002	8/1/2012
001	01119	Copper, Total Recoverable	1D Conc	38	52.	8/2/2012
001	00530	Total Suspended Solids	7D Conc	45	45.5	9/15/2012

GOTL submitted a mercury variance application as a part of its NPDES renewal, which is currently pending with the agency. No further information is needed to respond to the mercury violations at this time. Ohio EPA does note violations for copper and suspended solids in August 2012 and suspended solids in September 2012. Please note that Part III, Item 12 of your NPDES permit requires notification for noncompliance with 24 hours of occurrence. A fact sheet on noncompliance notification along with a link to the reporting forms may be found online at [http://epa.ohio.gov/portals/35/permits/24-hour\\_Report\\_FactSheet.pdf](http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf), and I have attached copies for your reference. Please provide an explanation for noncompliance, along with measures that it will not be repeated.

Reporting Violations

No reporting frequency or reporting code violations were noted for the time period reviewed.

Compliance Schedule Violations

Ohio EPA notes the following regarding the compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
6/1/2007	5/31/2012	9/1/2007	1/2/2008	11599	Bypass	Infiltration Report
6/1/2007	5/31/2012	6/1/2008	12/8/2008	95999	Other	E Coli Status Report
6/1/2007	5/31/2012	12/1/2008	11/7/2011	20099	Other	Mercury Treatability Report
6/1/2007	5/31/2012	6/1/2009	4/13/2012	—	Other	E. Coli PTI or Status
6/1/2007	5/31/2012	6/1/2010	Ongoing	—	Construction	Complete Construction

GOTL has acknowledged that improvements are needed to the disinfection system in order to comply with the bacteria limits and submitted a PTI on April 13, 2012. The PTI was approved on May 3, 2012. While main components of these improvements have been installed, GOTL is awaiting completion of instrumentation and is currently manually feeding chlorine and sodium bisulfide, with completion of the work expected by December 31, 2012. The mercury variance under review addresses the mercury treatability report. Ohio EPA acknowledges that we have received the revised I/I study and WWTP study and currently have the documents under review. It is noted that several of these milestones have been missed by a significant amount of time. Future milestones must be met by the prescribed times in your permit.

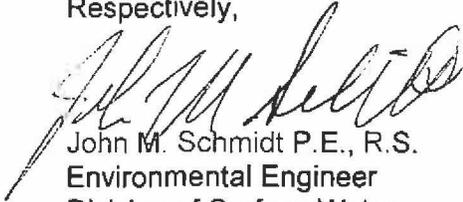
Other Violations

1. Failure to Maintain Minimum Staffing - Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class II State Certified Operator, as required by OAC 3745-7-02, which has minimum staffing requirements per OAC 3745-7-03. The plant must be staffed a minimum of 20 hours per week by a licensed operator each and every week. GOTL must either license existing staff so that they may operate the plant in Mr. Quinone's absence or contract with other operators in Mr. Quinone's absence.
2. Failure to Maintain a Facility Log Book: The inspection revealed that records required pursuant to OAC 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. The last entry in the facility log book was September 28, 2012. A log book must be maintained at the WWTP and available for inspection 24 hours a day. OAC 3745-7-09 outlines the information that must be maintained in the log book, including identification of the public water system, sewerage system, or treatment works; date and times of arrival and departure for the operator of record and any other operator required by OAC 3745-7; specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed; results of tests performed and samples taken, unless documented on a laboratory sheet; performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced; and identification of the

persons making entries. Minimum staffing hours must be demonstrated by sign-in and sign-out times.

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: Noncompliance Notification Fact Sheet and Reporting Form  
File: Municipal/Geneva-on-the-Lake Village WWTP (Ashtabula Co.)/PC

