



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

November 6, 2012

RE: LAKE COUNTY
NORTH PERRY
NEWGREEN LEGACY SERVICES, INC.
3715 PARMLY ROAD
NPDES PERMIT NO. 31R00035

NOTICE OF VIOLATION

Bruce Geddes
Radiation Safety Officer
NewGreen Legacy Services, Inc.
3715 Parmly Road
Perry, OH 44081

Dear Mr. Geddes:

On October 25, 2012, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves NewGreen Legacy Services. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. Mr. Don Forbush, Plant Manager, accompanied this writer during the inspection.

The WWTP consists of a former septic tank that has been compartmentalized into a trash trap, sludge holding tank and dosing tank with siphons, a 5,000-gallon Topco extended aeration package plant followed by surface sand filters and chlorination/dechlorination facilities. The WWTP treats sanitary sewage only.

At the time of inspection, the plant was producing an effluent of a satisfactory visual quality in that there was no evidence of foam, debris, oil, or grease. The following observations were noted:

- The extended aeration plant was in operation. The aeration tank mixed liquor was brown in color. The settling tank content was turbid.
- The filter beds contained some vegetation and leaves that must be removed. The filter sand must be raked and evenly distributed across the filter bed surface. The elbows of filter distribution arms are situated upright. The elbows of filter distribution arms are generally designed to turn downward where they are supported and discharge onto a splash slab. See the enclosed drawing from the Ohio EPA guidance document, "Sewage: Collection, Treatment & Disposal". This guidance document is available online at www.epa.ohio.gov/dsw.
- The plant effluent was being disinfected. The chlorinator contained chlorine tablets and the dechlorinator contained sulfite tablets, as required. Disinfection season ended October 31st and will resume again on May 1, 2013.
- The sludge holding tank was in operation, aerating the sludge.
- The operators of record for the facility are Ron Bell, Josh Goodrich and Bill Pennington.

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A review of the discharge monitoring reports, covering the period March 2011 through September 2012 revealed no effluent limitation violations; however, there were several second quarter (the months of April, May, June) monitoring frequency violations for 2012. This office did not receive second quarter data for CBOD5, Total Suspended Solids, Fecal Coliform, Dissolved Oxygen, pH, Total Residual Chlorine and Ammonia.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/cs

Enclosure