



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

January 14, 2013

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

**NOTICE OF VIOLATION**

**CERTIFIED MAIL**

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

Dear Mr. Seidel:

On January 10, 2013, 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 Chris Glassmeyer 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 April 26, 2012.

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 consists 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.

**Observations and Notations**

1. The plant is operated by Donald Velisek of AKE Environmental behalf of the Grand Valley Conservation Center as of April 23, 2012, according to Mr. Glassmeyer. The operators of record are listed Steve Howe and Charles Newman as well as Donald Velisek of AKE Environmental.
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. A follow-up conversation with Steve Howe indicated that a log book would be provided as soon as possible.

3. The flow equalization tank appears to be operating, although a low amount of air is being provided.
4. 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.
5. 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.
6. The sand filter dosing pumps and alarms were cycled and only one pump (Pump 2) was found in operating condition. This appears unchanged from the 2012 inspection. The water discharged to the sand filters during the cycling operation was observed as clear.
7. The East surface sand filter was in operation at the time of inspection. Water discharged to the bed was reasonably clear. The east bed was reasonably clear of vegetation. Some rutting in the sand was noted. The west bed was snow covered.
8. The disinfection tank was not observed as it was outside the normal disinfection season.
9. Mr. Glassmeyer does not recall sludge removed from the site in 2012.
10. The final discharge pipe at the tributary to the Grand River was not observed due to a lack of flow. An outfall sign is posted per Part II of your permit.
11. AKE Environmental is the designated operator of record for this facility. According to Mr. Glassmeyer, AKE Environmental observes the plant, makes adjustments as necessary, and performs routine monitoring of the plant, collects and analyzes samples. Collected data is reported by AKE on behalf of NCO on the electronic discharge monitoring reports (eDMRs).

#### **NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2012 through December 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. However, plant performance prior to April 23, 2012 is unknown due to a lack of data.

#### **Reporting Violations**

No data was collected prior to April 23, 2012 due in part to the lack of a licensed operator. The March 2012 eDMR, which was due no later than April 20, 2012, was filed on May 18, 2012. Monthly eDMRs must be submitted by 20<sup>th</sup> of the following month.

#### **Compliance Schedule**

Your current NPDES permit does not contain a compliance schedule.

Other Violations

1. Failure to Maintain a Facility Log Book and Other Onsite Records: 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. The records must be accessible onsite for twenty-four hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A)(2). The facility Owner and Operator are both responsible to make sure that the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. The log must include inspection dates with time in and time out, clearly identify who is logging time at the facility, and list all activities being performed during the visit, including any analysis not represented by a laboratory bench sheet. In addition to the log book, a copy of the contract with your ORC, as well as an operation and maintenance manual must be maintained at the site. None of these items were available for inspection as required by rule. For future reference, please indicate where these items will be maintained so that they are accessible to Ohio EPA staff and emergency personnel.
2. Minimum Staffing Requirements: Based upon a lack of a log book to document visits by your 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 and that information documented in the facility log.
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 between March 1, 2012 and April 22, 2012. As previous discussions have indicated that data was not collected during this timeframe, no additional information is needed to respond to the violation.

Based upon a lack of a log book to document visits by your ORC, NCO is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, OAC 3745-7-09 for not maintaining all the required information at the wastewater treatment facility (log book, contract, NPDES permit, and O&M Manual), and OAC 3745-33 for not meeting permit conditions, specifically Part II, Item A that requires that this facility be overseen by an ORC.

***Please inform this office, in writing, within 14 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: Dan Kopec, Ohio EPA, DSW CO  
Steven Howe, AKE Environmental

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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"><li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>Print your name and address on the reverse so that we can return the card to you.</li><li>Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) John Kopec</p> <p>C. Date of Delivery 1-16-13</p>
<p>1. Article Addressed to:</p> <p>Mr. Mark Schmalz Director of Operations The Nature Conservancy in Ohio 6375 Riverside Drive, Suite 100 Dublin, OH 43017</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) 7012 1010 0002 2260 0994 DSW</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 1-14-13 102595-02-M-1540</p>	