



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

March 12, 2013

RE: GRAND VALLEY COUNTRY MANOR
OHIO EPA PERMIT 3PR00232
WINDSOR TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. John W. Odegard, Owner
Grand Valley Country Manor
P.O. Box 156
Geveva, OH 44041

Dear Mr. Odegard:

On March 11, 2013, a site inspection was conducted at the above referenced facility at 5165 U.S. Route 322, Windsor Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody was available from Grand Valley Country Manor 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. The last compliance inspection was conducted on March 15, 2012.

The facility appears closed, and newspaper articles indicate that the facility closed in 2009. On January 31, 2011, Mark Hockran of Spieth Realty contacted Ohio EPA on your behalf about a potential split and sale of the property. Ohio EPA responded with a February 1, 2011 letter detailing the requirements of evaluating the site for a future change in use and transfer of the NPDES permit.

Observations and Notations

The following observations were made during the inspection:

1. The design flow of the extended aeration plant is 20,000 gallons per day. Currently, it appears that Grand Valley Country Manor is no longer in operation. No power appears available to the wastewater plant. The plant appears to be dormant, with the condition of pumps, alarms, and blowers unknown. Clarifiers appear to be overfilled, with the water level only a few inches from the top of each tank. Log books are not maintained at the facility, and information appears to have last been recorded in 2008. The final discharge was observed as not flowing. Ohio EPA records reflect that sludge has not been removed from this facility.
2. Data for the period February 2012 through February 2013 was not reported to Ohio EPA.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period August 1, 2011 through February 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations and Compliance Schedule Violations

No limit violations or compliance schedule violations were noted for the period reviewed.

Reporting Violations

No reporting data was provided to Ohio EPA for the entire monitoring period reviewed. **Data must be provided as long as your NPDES permit is in effect.** An explanation must be provided for this missing data.

Other Violations

1. Failure to Submit all Data Required by your Discharge Monitoring Reports - Pursuant to Part III, Item 4 of your NPDES permit, Grand Valley Country Manor is required to submit the required DMR data for all parameters as prescribed by your NPDES permit. Ohio EPA has not received any data since January 2012. Data reporting is required even if there is no flow from the facility. **Please provide evidence that you have submitted the missing eDMR information or provide a rationale as to why the required information has not been submitted.**
2. Failure to Notify a Change in Ownership – Ohio EPA notes that the property has been sold from Windsor Estates Realty, Ltd to John W. Odegard. Ohio EPA notified you of this via letter on February 1, 2011. Pursuant to Part III, Item 19 of the NPDES permit for this facility, Windsor Estates Realty, Ltd was supposed to notify the succeeding owner (John W Odegard) of the existence of this permit by letter and provide Ohio EPA a copy of this letter; and provide Ohio EPA with a written agreement between the parties acknowledging the date that liabilities for compliance will be assumed by the new owner. A transfer of ownership notification will need to be made again to transfer the permit to any future prospective owner. A transfer of ownership form must be completed and returned to Ohio EPA. The form may be found on the web at: http://epa.ohio.gov/portals/35/permits/NPDESTransferForm_fis.pdf.
3. Failure to Submit Annual Sludge Reports: Part II, Item K requires you to prepare an annual sludge report for this facility. Instructions and forms may be found online at http://epa.ohio.gov/dsw/sludge/annual_report.aspx. Note that as your permit allows only hauling of sludge to another wastewater facility (Station 588), you need only complete pages 1 and 4 of the form.

If there is no longer a flow to the plant due to the nursing home facility closure, the wastewater treatment facility must be prepared for an extended period of shutdown. This must include the following:

1. All sludge and sanitary wastewater must be pumped from the facility and taken to a publically-owned treatment works (POTW) for disposal. You should contract with a septage hauler to accomplish this. Copies of the hauling records must be submitted to this office for our files.
2. To keep the tanks from floating, the pumped wastewater must be replaced with clean water. Tank levels should be maintained below their respective outlets to clearly demonstrate that the water in the tanks is for ballast purposes only.
3. Pumps and blowers should be periodically inspected, lubricated, and cycled to ensure that they will be in proper operation when the wastewater plant is restarted. The sand beds must be periodically weeded to keep a root mass from forming in the beds and requiring filter media replacement.

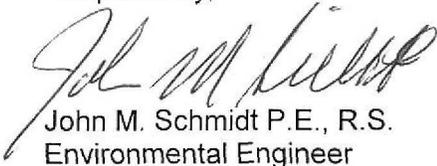
4. A facility that is not discharging to waters of the state are not required to be inspected by an operator of record as long as there are no discharges to waters of the state. The documentation provided to Ohio EPA should also contain a statement that you will notify Ohio EPA at least one week prior to restarting the facility and that an operator or record notification form will be submitted prior to restarting the wastewater plant.
5. You must amend any existing eDMR submissions and submit new eDMR reports to reflect that no flow has been observed from the facility since December 2010. eDMRs must still be completed even though there is no flow from the facility over the course of the month. This could be completed by either the owner or a designated operator.

It is imperative that you comply with your NPDES permit. Please be advised that failure to submit complete DMRs, failure to comply with the compliance schedule in your NPDES permit, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. Grand River Country Manor remains in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office, in writing, within 30 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response 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

File: SP/Ashtabula/Windsor Twp/Grand Valley Country Manor (3PR00232)