



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

March 13, 2013

RE: GEAUGA COUNTY  
NEWBURY TWP  
HOLLY HILL  
NPDES PERMIT 3PR00351

**NOTICE OF VIOLATION**

Mr. George Ohman  
P.O. Box 337  
Newbury, OH 44065

Dear Mr. Ohman:

On February 28, 2013, this writer conducted an unannounced inspection of the sewage treatment plant serving the above referenced facility. The intent of the inspection was to assess the operations and maintenance of the treatment system and review compliance with the National Pollutant Discharge Elimination System (NPDES) permit.

According to Agency records, an upgraded wastewater treatment system was installed under Ohio EPA Permit-To-Install (PTI) #02-17700, which was effective July 17, 2003. The wastewater system includes a 7,000 gallon flow equalization tank, a 2,500 gallon trash trap, a 15,000 gpd extended aeration treatment plant, 1,000 gallon dosing chamber, 2,050 ft<sup>2</sup> slow surface sand filter, chlorination, dechlorination, 1,500 gallon aerated sludge holding tank and a 150 ft<sup>2</sup> sludge drying bed. The pool backwash waters are collected in a holding tank and flows by gravity to the surface sand filters. A 500 gallon softener backwash water tank is provided and is designed to dose 150 gallons/dose into the dosing chamber.

**INSPECTION SUMMARY**

Below are the findings and recommendations from the inspection:

Inspection revealed the wastewater treatment plant (WWTP) was in operation and producing what appeared to be a satisfactory quality effluent.

The plant blowers were running. The flow equalization tank was in operation and a septic odor was noted around the chamber. The aeration chambers (both east and west sections) were somewhat full at the time of the inspection. The sludge in the aeration tanks appeared a dark brown. A septic odor was noted around the aeration chambers. The sludge return lines were in operation and returning a light brown colored sludge from the settling chambers. The air supply to the aeration chambers appeared adequate.

The settling chambers appeared cloudy and contained floating solids on the surface of the tanks and solids were observed in the effluent weirs. Solids are being discharged to the surface sand filters because they are not settling out in the settling chamber.

The surface sand filters were both flooded and one bed was frozen over. The surface of the filter beds contained brown sludge and floating solids. The area around the filters showed evidence of past overflows from the sand filters. The sand beds pond and overflow due to solids being passed from the WWTP to the sand beds.

The sludge holding tank was full and appeared to have recently overflowed onto the ground around the tank.

The chlorination and dechlorination was not in operation as this is currently not disinfection season.

#### NPDES PERMIT COMPLIANCE

The NPDES permit for this facility has an expiration date of October 31, 2013. NPDES permit renewal applications are required to be submitted at least 180 days before the expiration date of the permit.

According to the discharge monitoring report (DMR) data from January 1, 2011 through February 1, 2013, flow reported averaged 5,624.2 gpd. The discharge monitoring violations accrued during this review period are shown below:

Permit No	Reporting Period	Reporting		Parameter	Limit Type	Limit	Reported	Violation
		Station	Code				Value	Date
3PR00351*BD	October 2012	001	00515	Residue, Total Dissolv	1D Conc	1500	1769.	10/16/2012

According to the NPDES permit, the wastewater treatment system is listed as a Class 1 Wastewater Treatment system. Our records indicate Mr. Ronald Durkee is the certified operator of record (ORC) for this facility.

The operation and maintenance of the WWTP is not satisfactory and therefore is in violation of Part III, Section 3, of your NPDES permit, which states that:

"All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems, which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.
- B. The permittee shall effectively monitor the operation and efficiency of treatment and control facilities and the quantity and quality of the treated discharge.
- C. Maintenance of wastewater treatment works that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by Ohio EPA as specified in the Paragraph in the Part III entitled, "UNAUTHORIZED DISCHARGES". "

The WWTP shows evidence of having overflowed. Failing to report an overflow is a violation of Part III, Section 11, of your NPDES permit, which states:

“Unauthorized Discharges

- A. Bypassing or diverting of wastewater from the treatment works is prohibited unless:
1. Bypass was unavoidable to prevent loss of life, personal injury or severe property damage;
  2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of downtime. This condition is not satisfied if adequate back up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
  3. The permittee submitted notices as required under Paragraph D. of this section,
- B. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.
- C. The Director may approve an unanticipated bypass after considering its adverse effects, if the Director determines that it has met the three conditions listed in paragraph 11.A. of this section.
- D. The permittee shall submit notice of an unanticipated bypass as required in section 12.A.
- E. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded if that bypass is for essential maintenance to assure efficient operation.”

**SUMMARY**

- 1) You must submit your NPDES renewal application no later than April 1, 2013. The renewal application must include Forms 1, 2E, 2S and the Antidegradation Addendum; along with an application fee of \$200 (check made payable to Treasurer Stat of Ohio).
- 2) Submit a response to this office summarizing what actions will be taken to bring th4e WWTP back into proper operation and maintenance. More specifically, this office is requesting summaries of the overflow events (reason for overflows, etc), a summary of the condition of the surface sand filter, emptying of the sludge holding tanks and scraping of the settling chambers to attain a proper solids balance within the wastewater treatment system. This response must be submitted as soon as possible but no later than 35 days from the receipt of this letter.

Continued non compliance may result in this matter being referred for an enforcement action. This office will conduct a follow up inspection of this WWTP within the next 60 days to assess the renewal application and the WWTP compliance status. Should you have any comments or questions regarding this letter, please contact this office at (330)963-1299.

Respectfully,



Laura A. Weber, P.E.  
Environmental Engineer  
Division of Surface Water

LAW/cs

cc: Ronald Durkee, Holly Hill Nursing Home  
Geauga County Health Department, Att: Dave Sage