



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

June 24, 2013

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

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

NOTICE OF VIOLATION

CERTIFIED MAIL

Dear Mr. Seidel:

On June 18, 2013, a limited scope 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). Keith Kroeger and Jon van Dommelen from Ohio EPA's Compliance Assistance Unit (CAU) also attended the inspection. The purpose of the inspection was to assess the ability to modify the facility to match actual influent flows and to maximize plant performance, as well as 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 January 10, 2013.

Per our discussions, permanent residences include the main structure (six-bedrooms), two three-bedroom homes, and a two-bedroom home. Seasonal structures include two three-bedroom cabins. There are 17 summer cabins that have had plumbing removed and are planned to be razed in 2013 and possibly 2014. There are four permanent employees (included in the residential structures) and 10 seasonal employees (eight of which are included in the residential structures). Utilizing the flow estimations in Ohio Administrative Code (OAC) 3745-42-05, the current design flow to the facility is not expected to exceed 2,590 gpd.

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 and dechlorinator. 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. Mr. Glassmeyer operates the plant when it is not seen by AKE.

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2. The grass around the plant needs to be maintained at a height as to not introduce seeds, weeds, and other vegetation into the tanks and sand beds. Ohio EPA recommends mowing a minimum 15-foot radius around all treatment plant components.
3. The aeration tank appears to be devoid of solids, most likely caused by a combination of severe biological under-loading and over-aeration. Mr. Glassmeyer could not locate keys to open the grates, and keys to all locks must be maintained at the facility. The blowers were cycled and Blower No. 2 was not found functional. This must be corrected immediately. Air filters on the blowers are the original equipment metal filters and should be replaced by disposable paper filters. One belt on Blower No. 1 was found very loose, and all belts should be inspected, properly tightened, and replaced as necessary.
4. The surface of the clarifier was reasonably clear, but appears to lack a biomass to settle. Effluent channels were observed in reasonably clean condition. The skimmer was found in operating condition, and the return sludge lines were observed as operating properly, but were returning only clear liquids. During the visit, we discussed placing the blowers on 96-pin timers to adjust the oxygen supplied to more closely match the organic loading currently being applied to the plant. Other options were also discussed, including reducing the aeration tank volume and placing run-time meters (in minutes) on the dosing pumps. Recommendations from Ohio EPA's CAU will be provided under separate cover.
5. 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 January 2013 inspection. The water discharged to the sand filters during the cycling operation was observed as clear.
6. The sand beds were not found in acceptable condition. Both beds were found to have excessive vegetation. The East surface sand filter was in operation at the time of inspection. Water discharged to the bed was reasonably clear.
7. The disinfection tank chemical stocks could not be observed due to locks on the grates and no way to access the tablet chlorinator and tablet dechlorinator.
8. Mr. Glassmeyer does not recall sludge removed from the site in 2012 or so far in 2013.
9. The final discharge pipe at the tributary to the Grand River was observed as discharging clear. An outfall sign is posted per Part II of your permit.
10. 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 December 1, 2012 through June 1, 2013 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.

Reporting Violations

No flow data has been reported for this facility citing the lack of a flow meter in the monthly eDMRs. **Estimated flows must be provided.** The use of the "AH" code with an explanation that there is no

flow meter is not acceptable. Acceptable methods of estimating flow are, in order of preference: (1) elapsed time meters on sand filter dosing pumps; (2) elapsed time meters on influent pumps; or (3) water use records. During the site visit, we discussed the installation of runtime meters on the sand filter dosing pumps. These must be installed as soon as possible and actual flow provided. Until the runtime meters are installed, flows must be estimated by water use records.

Compliance Schedule

Your current NPDES permit does not contain a compliance schedule.

Other Violations

1. Maintaining the Facility in Proper Working Order: Part III, Item 3 of your permit, require you to maintain the plant in proper working order at all times. The sand beds must be maintained free of vegetation, and access to the plant by maintenance personnel must be provided at all times. A key to all locks used to secure the grates must be maintained in a readily accessible location to Mr. Glassmeyer, and available upon request by Ohio EPA.
2. Providing Accurate eDMR Records for Flow: Part III, Items 3 and 6 of your permit, require you to effectively monitor the operation and efficiency of treatment and control facilities and the quantity and quality of the treated discharge. 24-hour estimations of flow must be provided as prescribed by your permit. Acceptable methods of estimating flow are, in order of preference: (1) elapsed time meters on sand filter dosing pumps; (2) elapsed time meters on influent pumps; or (3) water use records. Ohio EPA understands that runtime meters will be installed on the sand filter dosing pumps. Until the runtime meters are installed, flows must be estimated by water use records.

Please inform this office, in writing, within 30 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: Keith Kroeger and Jon van Dommelen, Ohio EPA, DSW, CO
Steven Howe, AKE Environmental
Chris Glassmeyer, Nature Conservancy

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Mr. Mark Schmaltz, Director of Operations
 The Nature Conservancy in Ohio
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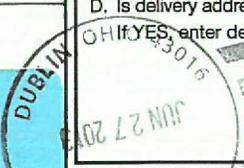
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