



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

August 7, 2013

RE: SUMMIT COUNTY
 VILLAGE OF PENINSULA
 EARTHLORE ENVIRONMENTAL CENTER
 3675 OAK HILL ROAD
 COMPLIANCE EVALUATION INSPECTION
 OHIO EPA NO. 3PN00006*CD

Mr. Michael Zuppo, Utility Systems Operator
 Cuyahoga Valley National Park
 9329 Riverview Road
 Brecksville, OH 44141

Dear Mr. Zuppo:

On July 10, 2013, a Compliance Evaluation Inspection (CEI) was conducted at the wastewater treatment system serving the Earthlore Environmental Campus. The basis of design of the wastewater treatment system was a maximum daily flow of 7500 gpd. The system consists of a two-cell wastewater stabilization pond, approximately 28,000 square foot in surface area. Following the stabilization ponds is a wetland/evaporation system approximately 101,000 square foot in surface area. The wetland/evaporation system was to be considered a free-water surface (FWS) wetlands. Originally, the system was designed with no discharge. But because the system began discharging during spring thaws, a chlorination/dechlorination tank had been installed and a National Pollutant Discharge Elimination System (NPDES) permit had been issued by this office.

During the inspection, the stabilization ponds were odorous and covered with green algae. Both wetlands appeared to be more established compared to the previous inspections conducted by this office. Although both wetlands are showing some improvement, there was dark grayish black sewage in the wetlands, especially in the beginning of the wetlands. The wastewater in the second section of the wetlands looked to be less dark in color, but contained quite a bit of green algae. The liquid in the disinfection tank was also covered with green algae.

Review of the electronic Discharge Monitoring Reports (eDMRs) submitted for this wastewater treatment system from July 2011 through July 2013, revealed the following effluent violations:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.55	12/1/2011
December 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.6	12/15/2011
November 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.8	11/8/2012
November 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.75	11/1/2012
November 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.7	11/22/2012
January 2013	001	Total Suspended Solids	30D Conc	30	35.	1/1/2013
January 2013	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	7.4	1/1/2013
January 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	7.4	1/8/2013

EARTHLORE ENVIRONMENTAL CENTER
AUGUST 8, 2013
PAGE 2 OF 2

Please be advised such instances of noncompliance are subject to enforcement pursuant to Ohio Revised Code (ORC) 6111.

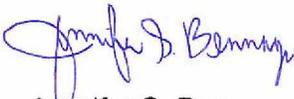
Please be advised that this facility is also in violation with the Compliance Schedule in its current NPDES permit. Within six months from the effective date of the permit, an Operation and Maintenance Manual was to be submitted to this office. Within 12 months from the effective permit date, a General Plan was to be submitted to this office for proposed wastewater treatment system upgrades. A permit-to-install (PTI) for the upgrades was to be submitted within 18 months, and construction was to be completed within 24 months.

During a recent conversation with Janet Popielski, Civil Engineer for Cuyahoga Valley National Park (CVNP), it was learned that CVNP is planning to abandon this wastewater treatment system. The entire site's sewage is planned to be connected to the Everett Road sanitary sewer system which proceeds to the City of Akron's WWTP. A portion of the wetlands system may remain, treating only storm water runoff from the site. Construction is planned to commence in the Fall of 2014.

It is directed that CVNP submit an NPDES Modification Application to this office, requesting a new Compliance Schedule with obtainable time-frames to obtain a PTI for a sanitary sewer extension and abandonment of the wastewater treatment system. Please submit the enclosed NPDES Modification Form, along with a \$200 check made payable to the Treasurer of the State of Ohio, as soon as possible.

If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water
(330) 963-1151

JSB/cs

cc: Ms. Janet Popielski, P.E., Cuyahoga Valley National Park
ec: Tom LaPlante, Summit County Health Dept.