



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

August 22, 2013

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

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

Dear Mr. Seidel:

On August 21, 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 continue 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 inspections were conducted on January 10, 2013 and June 18, 2013.

Per our discussions, permanent residences include the main structure (6-bedrooms), 2 three-bedroom homes, and a two-bedroom home. Seasonal structures include 2 three-bedroom cabins. There are 17 summer cabins, which have had plumbing removed and are planned to be razed in September 2013. There are 4 permanent employees (included in the residential structures) and 10 seasonal employees (8 of which are included in the residential structures). In addition to these activities, Mr. Glassmeyer indicated that the former gymnasium may be used for banquets, and the complex may host small groups of children for day activities. Kitchen facilities may be added to the former gymnasium building in the future.

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 a 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 aeration tank appears to be devoid of solids, most likely caused by a combination of severe biological under-loading and over-aeration. Air is very uneven in the tanks, with excessive bubbling on the west side of the tanks and almost no air in the east side of the tanks. Aeration headers should be pulled and inspected, and longer aeration headers fashioned as necessary. The blowers were cycled and found functional. Air filters and belts have been replaced. We discussed re-plumbing the tankage to convert some aeration tank units into equalization tanks and eliminating other tanks. Any plant modifications that results in a lowering of the design capacity of the plant will require a permit-to-install submitted to this office, but could be conducted concurrently with plant modifications recommended by Ohio EPA's compliance assistance unit.
3. The surface of the clarifier was reasonably clear, but appears to lack a biomass to settle. Duckweed was noted on the eastern side of the clarifiers. 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. 96-pin timers have been installed, and were being adjusted to allow a run cycle of 15 minutes on and 45 minutes to an hour off to adjust the oxygen supplied to more closely match the organic loading currently being applied to the plant. Run-time meters have also been installed and the run-time was being recorded. Additional recommendations from Ohio EPA's CAU will be provided under separate cover.
4. The sand filter dosing pumps and alarms were cycled and both pumps were found operational; however, the run light for Pump No. 2 appears to not be functional. The indicator light needs to be replaced. The water discharged to the sand filters during the cycling operation was observed as clear.
5. The sand beds were found in better condition than the June 2013 inspection, but additional vegetation removal is required. The West surface sand filter was in operation at the time of inspection. Water discharged to the bed was reasonably clear.
6. The disinfection tank was found in reasonably clean condition, and the tablet chlorinator was found stocked with chemicals. A tablet dechlorinator will need to be added or the disinfection tank replaced with an ultraviolet (UV) disinfection system. The UV system, if chosen, will require a PTI. Any additional tablet dechlorinator should be added to any proposed plant modification PTI.
7. No sludge has been installed since the last inspection.
8. 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.
9. 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 June 1, 2013 through August 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 continues to be 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. Ohio EPA notes that elapsed time meters have been installed in the dosing pump control panel, and were being calibrated by Mr. Kroeger and Mr. van Dommelen during the inspection. Flow should have been estimated for at least the July 2013 eDMR.

Compliance Schedule

Your current NPDES permit does not contain a compliance schedule.

Other Violations

1. 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. Flows should have been estimated by water use records for the July 2013 eDMR and the run time meters utilized since they have been installed.

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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