



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

August 28, 2013

RE: GEAUGA COUNTY
MIDDLEFIELD TWP
BRIDGE LAKE FARM
NPDES # 3PW00029*BD

NOTICE OF VIOLATION

CERTIFIED LETTER

Mr. Walter Parnaby
Bridge Lake Farms
16770 Bridge Road
Middlefield, Ohio 44062

Dear Mr. Parnaby;

On August 23, 2013, this writer conducted an 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.

The wastewater treatment system serves a single family residence and 12 one-bedroom efficiency apartments. The existing buildings are served by a 3,400 gpd package aeration system with a clarifier, dosing chamber, surface sand filter and UV disinfection which discharges to a private lake in the Swine Creek stream network.

According to Agency Records, the renewal NPDES permit was submitted to this office along with a permit-to-install (PTI) application on May 3, 2011. The renewal NPDES permit was issued August 1, 2012.

PTI application #811585 was a resubmittal of PTI 02-14180 for wastewater treatment plant (WWTP) upgrades. The detail plans were originally submitted on September 12, 2000, and a PTI (02-14180) was issued on September 22, 2000. A one year extension of the PTI was granted and expired on May 20, 2003. The PTI included the following improvements:

- Conversion of the existing aeration system tank into an 840 gallon trash trap with a divider wall, maintaining 1,800 gallon tankage for future use as an equalization tank if necessary;
- Installation of a new 3,500 gpd package aeration plant with clarifier;
- New 500 gallon dosing station (working volume 274 gallons) with dual, alternating submersible pumps (each pump 60 gpm@10 ft TDH); high water alarm; time lapse meters;
- Surface sand filters (272 ft²) total; and
- Ultra violet (UV) disinfection (Trojan System 3000).

NPDES PERMIT COMPLIANCE

- 1) The permit compliance review indicates you have violated the terms and conditions of your NPDES permit. The facility has failed to conduct the required monitoring and has failed to submit any discharge monitoring reports since prior to January 1, 2008. This is a violation of your NPDES permit and subject to enforcement actions pursuant Ohio Revised Code, Chapter 6111.
- 2) The NPDES permit classifies the WWTP as a Class A wastewater treatment facility. As such, the facility is required to obtain the services of, at minimum, a Class A state certified operator. According to our records, the facility has failed to obtain an operator of record (ORC) . As such, the facility is in violation of Part II of the NPDES permit. The facility must obtain a certified operator by September 9, 2013. The enclosed ORC form must be completed and submitted to this office by September 9, 2013.
- 3) At the time of the inspection, the installation of the upgraded wastewater treatment system was not completed. This office previously notified Bridge Lake Farm in a letter dated February 2, 2012 of the noncompliance relating to the PTI for the wastewater treatment system. In that letter (copy enclosed), this office required Bridge Lake Farm to finalize WWTP upgrades as soon as possible but no later than May 20, 2012. That work was required to also include the complete conversion of the existing WWTP tank, finishing the new extended aeration treatment system and new dosing station.

The site inspection revealed the work has not been completed and the installation of the wastewater treatment system is not in strict accordance with the plans and application approved by the director of the Ohio Environmental Protection Agency. The PTI issued to Bridge Lake Farms states "there shall be no deviation from these plans without the prior express, written approval of the Agency". To date, no updates or requests for a deviation from the PTI have been submitted to this office for the continued operation of this treatment system. Any deviations from the PTI or the PTI conditions may lead to sanctions and penalties as provided under Ohio Revised Code 6111 and Ohio Administrative Code 3745-31.

Due to the chronic and continued noncompliance relating to the NPDES permit and the PTI issued to this facility, this office is referring the matter to our Legal Staff to initiate an enforcement action against Bridge Lake Farm.

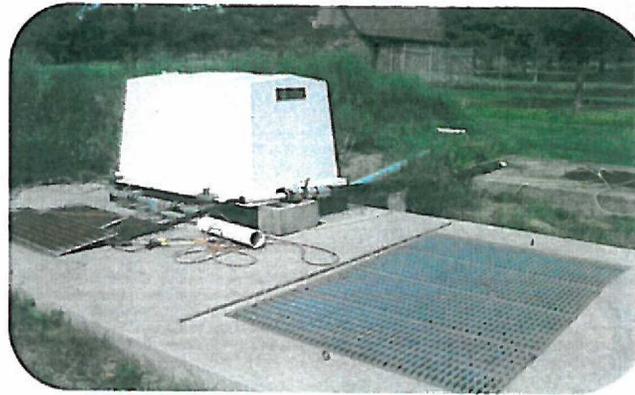
INSPECTION SUMMARY

Below are the findings and recommendations from the inspection:

The upgrades to the WWTP have not been finalized. The existing aeration system tank must be converted, per the PTI, into an 840 gallon trash trap and 1,800 gallons, maintained for future use as a flow equalization tank. The conversion would include a divider wall.

At the time of the inspection, the treatment system components were installed but the system was not being operated in accordance with the approved PTI for this facility.

The wastewater appears to be pumped from the new flow equalization tank to the existing extended aeration treatment plant. At the time of the inspection, there was a corrugated pipe between the flow equalization tank and the aeration tank (see photo below). This operation is not in compliance with the PTI issued to this facility.



Flow Equalization

The upgraded dosing chamber was installed but was not in use because it did not appear to be connected to electricity (see photo). The existing dosing chamber was in use and the concrete lid was not sealed on top of the tank. The existing dosing station must be eliminated and the system switched over to the new dosing station once the new system is online.



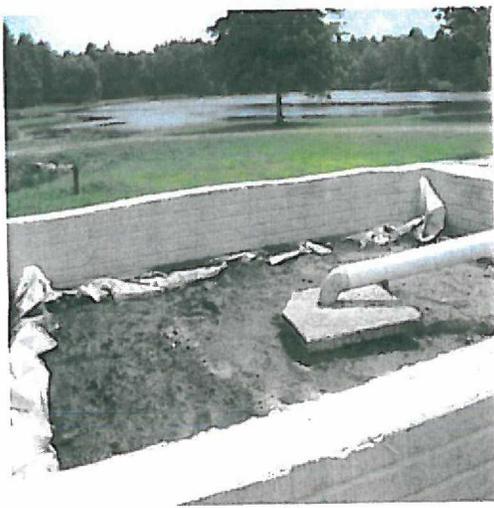
New Dosing
Chamber



Existing Dosing Chamber

The sand filters were in poor condition and contained thick layers of sludge, debris and heavy vegetative growth (see photo). The sand provided for the sand filters was piled next to the filters and sliding downhill into the receiving stream. This sand must be stored in a location away from the receiving stream. In addition, the filter sand appeared to be coarser sand. This office will need verification this filter sand meets Ohio EPA filter sand specification. More specifically, filter sand must be clean and washed with an effective size between 0.4 and 1.0 mm with a uniformity coefficient not greater than 3.0. Please submit proper verification this filter sand meets these specifications.

Sand Filter



The UV unit was not located onsite and it appears there is no disinfection provided for this WWTP. There was no sludge holding provided because the existing WWTP had not been converted to a sludge holding tank. If the facility chooses to install a sludge holding tank (versus converting the aeration treatment system to sludge holding), the facility will be required to submit a PTI application because this is not included in the existing PTI for this facility. Installing a sludge holding tank without a PTI is a violation and subject to further enforcement action by this office.

The operation and maintenance of this WWTP is in violation of Part III of the NPDES permit and the treatment system is not in accordance with the PTI issued to the facility.

SUMMARY

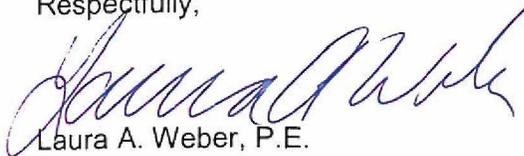
In summary, the following items must be completed within the required deadline:

- 1) Finalize WWTP upgrades immediately but no later than September 30, 2013. This must include the complete conversion of the existing WWTP tank, finishing the new extended aeration treatment system and new dosing station.
- 2) Obtain the services of a Class A WWTP operator as soon as possible but no later than September 10, 2013.
- 3) Provide information on the sand filter media being used. Information from the supplier is acceptable.
- 4) Relocate the sand media storage area so the sand is not piled next to the receiving stream. No plastic buckets are to be used for the collection of samples. When collecting samples, use the sampling containers provided by the lab. If a bucket must be used, please make sure to choose a metal container.

Contact this office as soon as possible, but no later than ten days from receipt of this letter, to acknowledge receipt of the letter and discuss the issue of non-compliance.

Should you have any comments or questions regarding this letter or your non-compliance, please contact this office at (330)963-1299.

Respectfully,



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

LAW/cs

cc: Dave Sage, Geauga County Health Department

File/SemiPublic/Geauga/3PW00029

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PS Form 3800, August 2006

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1. Article Addressed to:

Mr. Walter Parnaby
 Bridge Lake Farms
 16770 Bridge Road
 Middlefield, Ohio 44062

2. Article Number

(Transfer from service label)

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PS Form 3811, February 2004

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