



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

September 26, 2013

RE: GENEVA ON THE LAKE VILLAGE WWTP
GENEVA-ON-THE-LAKE, ASHTABULA CO
OHIO EPA PERMIT 3PC00020
COMPLIANCE EVALUATION INSPECTION

Honorable David Nelson, Mayor
James Hockaday, Village Administer
Village of Geneva-on-the-Lake
4929 South Warner Drive
Geneva-on-the-Lake, OH 44041

Dear Mayor Nelson and Mr. Hockaday:

On September 25, 2013, a site inspection was conducted at the above referenced facility at 4843 North Broadway (State Route 534), Geneva-on-the-Lake Village, Ashtabula County. The inspection was conducted by John Schmidt of this office. Dale Golbel, Wastewater Superintendent, Matt Reuschling, plant operator, and James Hockaday, Village Administrator represented the Village of Geneva-on-the-Lake (GOTL) during the inspection. The purpose of the inspection was 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, and in conjunction with the renewal of that permit. The last compliance inspection was conducted on September 12, 2012.

The system consists of a emergency retention basin (equalization tank), preliminary treatment consisting of bar screens and manual grit removal, a 20,000 gallon raw sewage pump station, a 415,000 gpd dual-unit contact-stabilization activated sludge treatment process, final settling tanks, chlorine disinfection, and sodium bisulfate dechlorination. Sodium bisulfate is fed for chlorine residual control. Sludge management consists of aerobic digestion and settling tanks, with dewatering through a small sludge press, with the filtrate routed to the plant headworks. Sludge drying beds used prior to August 2012 are maintained as an alternate dewatering method. Geneva-on-the-Lake has the option of either land application or hauling the sludge to a landfill through its current NPDES permit. Sludge is hauled to a sanitary landfill in Geneva Township. The facility discharges a sewer along State Route 531 to the east of the plant, which then flows to Lake Erie to the north of the facility. Generators provide backup power to the entire facility.

The plant has a bypass from the former Imhoff tanks converted into an equalization tank. Chlorine disinfection and sodium bisulfite dechlorination has been added to bypass flows. The bypass is blended with the final effluent prior to Outfall 001. Outfall 001 is located downstream of both the final plant discharge and Outfall 602.

Observations and Notations

Victor Quinones, former Wastewater Superintendent, has retired from the Village. Mr. Quinones is still identified as the operator of record for this facility. Mr. Dale Golbel became the wastewater superintendent effective September 23, 2013. Part II, Item A of your permit and Ohio Administrative Code (OAC) 3745-7-02 require that Ohio EPA be notified of a change of the operator of record within 3 days of such a change. Ohio EPA was provided a copy of the ORC notification during the visit. Mr. Reuschling is a Class I Operator who also staffs the plant and can operate the plant up to 30 days per year per OAC 3745-7-02.

1. Copies of the facility log books, permit, and operations and maintenance manuals were available for inspection. The documentation was found compliant with OAC 3745-7-09.
2. Influent and effluent monitoring time proportional composite samplers were retrofitted to monitor on a flow-proportional basis in June 2011. The effluent sampler was replaced with a new model on October 10, 2012. Both samplers were noted as collecting flow-proportional samples and were maintained at the proper temperature.
3. Screenings and grit are containerized for disposal at a solid waste landfill. The comminutor was noted as not operating, with all flow diverted through the manual bar screens. The comminutor blades need to be replaced or sharpened. Raw sewage pumps have been re-wired.
4. New flow meters and totalizers were installed in phases between mid-April and completed on June 7, 2011.
5. Both the east and west plants were operating at the time of the inspection.
6. The content of the aeration tank had good color and mixing, with moderate foaming. The plant was acknowledged as containing too many solids. Sludge returns were a chocolate brown color, with moderate foaming. Blower No. 2 was noted as inoperable with a bad bearing. The remaining blowers were currently providing sufficient air to the aeration tanks. Blower No. 2 should be repaired as soon as possible.
7. The surface of the clarifier was clear, with a significant accumulation of scum and grease in the rotating skimmer. The effluent trough was reasonably clean and there was no scum around the effluent baffle or the trough. Effluent channels and weirs are scrubbed weekly.
8. The sludge digesters were noted as operating as designed. The sludge processing building was completed in June 2013. The sludge press was noted as operating. Sludge is decanted once weekly.
9. Disinfection system improvements have been completed, implementing a PTI approved by Ohio EPA on May 3, 2012. Chlorine and sodium bisulfide are being metered into the system. The Village has added air lines to the disinfection tank implementing the May 3, 2012 PTI.
10. Sludge handling since June 2013 includes processing sludge through a sludge press and discharging the filtrate to the headworks of the plant. Dewatered sludge is collected in a 15 CY dumpster with a drain that discharges to the plant headworks. Approximately 8 tons per week of sludge are removed for disposal at Waste Management's Geneva Landfill.

11. The wastewater treatment plant (WWTP) laboratory performs monitoring of pH, temperature, dissolved oxygen, chlorine residual, and total suspended solids (sludge only). Geneva-on-the-Lake contracts with Northcoast Laboratories for BOD, suspended solids (plant flows), ammonia-nitrogen, phosphorus, metals, oil and grease, nitrate-nitrite, bacteria, and quality assurance samples from the WWTP laboratory.
12. The final effluent at the outlet to Lake Erie could not be observed due to the outlet being submerged. During the inspection, I observed an open manhole at the facility immediately upstream of Outfall 001 and the final discharge appeared to be of acceptable visual quality.
13. The Village accepts septage for disposal from one septic hauler, Northeast Septic. Septage is logged and is 75% domestic septage and 25% septage from package plants and trash trap cleanouts from non-industrial clients. Samples are collected with each load and maintained for analysis in the event of a WWTP problem.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2012 through September 1, 2013 indicates noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following effluent limit violations are noted:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|----------------------------|------------|--------|----------------|----------------|
| 001 | 00530 | Total Suspended Solids | 7D Qty | 71 | 76.4305 | 11/1/2012 |
| 001 | 00400 | pH | 1D Conc | 9.0 | 9.1 | 12/8/2012 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Conc | 1.3 | 5.6 | 12/1/2012 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Qty | 0.0000 | .00001 | 12/1/2012 |
| 001 | 00530 | Total Suspended Solids | 30D Qty | 47 | 47.4063 | 1/1/2013 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Conc | 1.3 | 16.4 | 3/1/2013 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Qty | 0.0000 | .00002 | 3/1/2013 |
| 001 | 00400 | pH | 1D Conc | 6.5 | 4.5 | 6/19/2013 |
| 001 | 50060 | Chlorine, Total Residual | 1D Conc | 0.038 | .05 | 6/29/2013 |
| 001 | 50060 | Chlorine, Total Residual | 1D Conc | 0.038 | .08 | 6/30/2013 |
| 001 | 00530 | Total Suspended Solids | 7D Conc | 45 | 146. | 6/15/2013 |
| 001 | 00530 | Total Suspended Solids | 7D Qty | 71 | 190.869 | 6/15/2013 |
| 001 | 00530 | Total Suspended Solids | 30D Conc | 30 | 45.5 | 6/1/2013 |
| 001 | 00530 | Total Suspended Solids | 30D Qty | 47 | 60.1218 | 6/1/2013 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Conc | 1.3 | 11.7 | 6/1/2013 |
| 001 | 50092 | Mercury, Total (Low Level) | 30D Qty | 0.0000 | .00003 | 6/1/2013 |
| 001 | 31648 | E. coli | 30D Conc | 126 | 343.944 | 7/1/2013 |

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any effluent violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at <http://epa.ohio.gov/portals/35/permits/24-hour Report FactSheet.pdf>. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>.

Ohio EPA received an explanation for the November 2012 suspended solids violation on December 19, 2012, and was attributed to high flows and a plant bypass. Ohio EPA has not received noncompliance notifications for the December 2012 ammonia or CBOD violations, the January 2013 or February 2013 violations. Please use the above referenced forms to provide a written explanation for these apparent violations along with remedies to ensure that they are not repeated.

Ohio EPA notes that GOTL has been in **significant noncompliance for mercury** in 2012 and 2013. GOTL submitted a mercury variance application as a part of its NPDES renewal, which is currently pending with the agency. Ohio EPA has issued a draft permit and is awaiting the public comment period to close prior to issuing the permit as final. No further information is needed to respond to the mercury violations at this time.

Reporting Violations

No reporting frequency or reporting code violations were noted for the time period reviewed.

Compliance Schedule Violations

Ohio EPA notes the following regarding the compliance schedule:

| Permit Effective Date | Permit Expiration Date | Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone |
|-----------------------|------------------------|-------------------|-----------------|------------|---------------|-----------------------------|
| 6/1/2007 | 5/31/2012 | 9/1/2007 | 1/2/2008 | 11599 | Bypass | Infiltration Report |
| 6/1/2007 | 5/31/2012 | 6/1/2008 | 12/8/2008 | 95999 | Other | E Coli Status Report |
| 6/1/2007 | 5/31/2012 | 12/1/2008 | 11/7/2011 | 20099 | Other | Mercury Treatability Report |
| 6/1/2007 | 5/31/2012 | 6/1/2009 | 4/13/2012 | --- | Other | E. Coli PTI or Status |
| 6/1/2007 | 5/31/2012 | 6/1/2010 | 12/31/2012 | --- | Construction | Complete Construction |

GOTL submitted a PTI for plant improvements to the disinfection system in order to comply with the bacteria limits on April 13, 2012. The PTI was approved on May 3, 2012 and completed on December 31, 2012. The mercury variance under review addresses the mercury treatability report. Ohio EPA acknowledges that we have received the revised I/I study and found the plan acceptable. It is noted that several of these milestones have been missed by a significant amount of time. Any future milestones must be met by the prescribed times in your permit.

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: Dale Golbel, Geneva-on-the-Lake

File/Municipal/Geneva-on-the-Lake Village WWTP (Ashtabula Co.)/PC