Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 28, 2011

RE: GEAUGA COUNTY
RUSSELL TWP
JOHN ANTHONY OF NOVELTY
NPDES PERMIT 3PR00534

NOTICE OF VIOLATION

Ms. Joni Crawford, Owner
Crawford Properties Ltd.
14860 Chillicothe Road
Novelty, Ohio 44072

Dear Ms. Crawford:

On November 1, 2011, this writer conducted a limited scope site records inspection at the above referenced facility located at 14860 Chillicothe Road, Russell Township, Geauga County. An inspection of the wastewater treatment plant (WWTP) operations and maintenance was also conducted. The purpose of the inspection was to evaluate the facility's operations and maintenance records with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and Ohio Administrative Code (OAC) Rule 3745-7-09 for the time period of September 4, 2011 through September 17, 2011.

The inspection revealed that records required pursuant to OAC 3745-7-09(A) (3) are not being maintained at the facility and were not available for inspection as required by rule. The records must be accessible onsite for 24 hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A) (2). The facility Owner and Operator are both responsible to make sure that the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. The log must include inspection dates with time in and time out, clearly identify who is logging time at the facility, and list all activities being performed during the visit. In addition to the log book, a copy of the contract with your Operator of Record (ORC) must be maintained at the site. You and your ORC must also submit a new ORC notification form to Ohio EPA's Operator Certification Unit as indicated on the form which must include all ORCs who inspect this facility. As a courtesy, please provide a copy of the revised ORC form to this office for our records.

Based upon a lack of a log book to document visits by your ORC, John Anthony of Novelty is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, OAC 3745-7-02 for not listing all ORCs, OAC 3745-7-09 for not maintaining a facility log book, and OAC 3745-33 for not meeting permit conditions, specifically Part II, Item A that requires that this facility be overseen by an ORC.

Wastewater Treatment Plant Review

The WWTP was in operation at the time of the inspection. There is one blower which was in operation at the time of the inspection. The mixed liquor in the aeration tank was a slight gray color and a septic odor was noted. The air circulation in the tank appeared to be lacking in areas and the

rollover in the tank was not adequate. The clarifier contained solids and the sludge return line was not effectively returning sludge to the aeration tank. The skimmer was set out of the water level and was not properly skimming solids off the surface of the tank. The WWTP is not provided with sand filters or disinfection.

The NPDES permit for this facility contains a compliance schedule which gives you until September 1, 2014 to obtain a permit-to-install (PTI) and install an upgraded wastewater treatment system or a sanitary sewer extension. A plant upgrade should, at minimum, consist of a properly sized dosing station with an elapsed time meter, aerated sludge holding, surface sand filters and disinfection. Constructing a sanitary sewer extension to the available public sewer would give the facility the ability to abandon the WWTP. Before beginning construction on either option, the facility must obtain a PTI from this office. To obtain a PTI, the facility must submit a PTI application, detail plans stamped by a Professional Engineer to this office for review. The facility is prohibited from beginning construction on either option until a PTI is issued.

A previously noted by this office, OAC 3745-31-05 states "best available technology" must be utilized. Therefore, a wastewater treatment system shall be abandoned and connected to the sanitary sewer if such a sewer is available. It is our understanding there is potential for a sewer to be extended by Russell Township at the intersection of S.R. 306 and S.R. 87. If this sewer project comes to fruition, the only option available would be to connect to this sanitary sewer.

Please inform this office, in writing, within 14 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) 963-1299.

Respectively,

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

LAW/cs

Daniel Kopec, Ohio EPA, DSW, CO
Dustin Lewis, Lewis Wastewater Management

File: Geauga/Munson Twp/3PR00525