

**Environmental
Protection Agency**

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

October 21, 2011

RE: CUYAHOGA COUNTY
CITY OF PEPPER PIKE
THE COUNTRY CLUB, INC.
NPDES PERMIT NO. OH0044725
OHIO EPA PERMIT NO. 3PR00052

Mr. Robert Josey, General Manager
The Country Club, Inc.
2825 Lander Road
Pepper Pike, OH 44124

Dear Mr. Josey:

An inspection of the wastewater treatment plant (WWTP) serving the referenced facility was conducted by the undersigned on September 21, 2011. The purpose of the inspection was to obtain and review information in anticipation of renewal of the facility's National Pollutant Discharge Elimination System (NPDES) discharge permit.

For the record, Agency records indicate a historical pattern of submitting late renewal applications. The recent application was received by Ohio EPA on September 8, 2011. Pursuant to Federal and State regulations, renewal applications **are required** to be submitted no later than six (6) months prior to the date of expiration.

Facility Description

The current NPDES permit authorizes an average daily discharge of 0.0245 MGD to the unnamed tributary of the Chagrin River. The WWTP consists of a trash trap, extended aeration package plant with a clarifier, dosing chamber, a surface sand filter, chlorination/dechlorination, and an aerated sludge holding tank.

Inspection Findings/Compliance Status

At the time of the inspection the following items were noted and discussed with you:

1. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. A visual observation of the plant effluent revealed no signs of floating debris, oil & grease, or foam in the discharge.
2. Please ensure that all metal grating over the treatment components are structurally sound.



- We understand that the WWTP is maintained under a service agreement with Mr. Everett McDaries. The agreement also includes submission of the monthly Discharge Monitoring Reports (DMRs). Agency records, however, do not indicate that an Operator of Record (ORC) notification form has been submitted. A copy of the ORC form is enclosed.

A review of the DMRs received by Ohio EPA for the period, January 2009 – September 2011, was conducted. The review indicates violations of the terms and conditions of the NPDES permit. The specific violations are as follows:

| Country Club, Inc. (1/2009 - 9/2011) | | | | | | |
|--------------------------------------|---------|------------------|------------|-------|----------------|----------------|
| Reporting Period | Station | Parameter | Limit Type | Limit | Reported Value | Violation Date |
| June 2009 | 001 | CBOD 5 day | 30D Conc | 10 | 17. | 6/1/2009 |
| June 2009 | 001 | CBOD 5 day | 1D Conc | 15 | 17. | 6/17/2009 |
| June 2009 | 001 | pH | 1D Conc | 6.5 | 6.43 | 6/30/2009 |
| September 2009 | 001 | CBOD 5 day | 30D Conc | 10 | 11. | 9/1/2009 |
| May 2010 | 001 | pH | 1D Conc | 6.5 | 6.42 | 5/14/2010 |
| May 2010 | 001 | pH | 1D Conc | 6.5 | 6.28 | 5/25/2010 |
| May 2010 | 001 | pH | 1D Conc | 6.5 | 6.33 | 5/28/2010 |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 4.22 | 7/6/2010 |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 2.26 | 7/9/2010 |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 2.31 | 7/13/2010 |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 2.38 | 7/16/2010 |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 4.93 | 7/20/2010 |

| Country Club, Inc. (1/2009 - 9/2011) | | | | | | |
|--------------------------------------|---------|--------------------------------------|------------|-------|----------------|----------------|
| Reporting Period | Station | Parameter | Limit Type | Limit | Reported Value | Violation Date |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 4.98 | 7/23/2010 |
| July 2010 | 001 | Dissolved Oxygen | 1D Conc | 6.0 | 5.22 | 7/30/2010 |
| September 2010 | 001 | Total Suspended Solids | 30D Conc | 12 | 31. | 9/1/2010 |
| September 2010 | 001 | Total Suspended Solids | 1D Conc | 18 | 31. | 9/16/2010 |
| November 2010 | 001 | Total Suspended Solids | 30D Conc | 12 | 13. | 11/1/2010 |
| November 2010 | 001 | CBOD 5 day | 30D Conc | 10 | 29. | 11/1/2010 |
| November 2010 | 001 | CBOD 5 day | 1D Conc | 15 | 29. | 11/18/2010 |
| January 2011 | 001 | Nitrogen, Ammonia (NH ₃) | 30D Conc | 8.67 | 12.5 | 1/1/2011 |

Please be advised that past or current violations of the terms and conditions of the NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code (ORC). Such actions can result in fines of up to \$10,000 per day of violation.

Anticipated NPDES Permit Changes

Based on recent rule revisions and/or policy guidance, the following changes will be incorporated into the renewal permit:

- The facility will be re-classified as a Class A treatment works in accordance with Ohio Administrative Code (OAC) 3745-7. As specified in the rules, the certified operator will be required to visit the plant at a minimum of 2 days/week.
- As of March 15, 2010, the current Fecal Coliform water quality standard was replaced by an *E. coli* standard. Based on the new Class A Primary Contact Recreation standard, the projected *E. coli* effluent limitations for the facility will be 126/100 ml (30-day average) and 284/100 ml (7-day average). The NPDES permit will include a "Schedule of Compliance" to allow the facility time to achieve compliance with the new requirement. **Please advise this office if you believe that such a schedule is not necessary.**
- Monitoring for Color, Severity and Odor, Severity will be discontinued.

Summary/Conclusion

Based on the inspection findings and the facility's compliance record, this office anticipates drafting and public-noticing the renewal permit for public review and comment. Comments received during the public-notice period will be considered by Ohio EPA prior to issuance of a final permit.

Mr. Robert Josey
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Should you have any questions or comments regarding this letter, please contact me at (330)963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/cs

File: SemiPublic/Cuyahoga County/Pepper Pike