



Environmental
Protection Agency

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

February 24, 2011

RE: CUYAHOGA COUNTY
VILLAGE OF GATES MILLS WWTP
NPDES PERMIT NO. OH0128643
OHIO EPA PERMIT NO. 3PA00035

Ms. Anastasia Gliha, Environmental Services Manager
Cuyahoga County Sanitary Engineer
6100 W. Canal
Valley View, Ohio 44125

Dear Ms. Gliha:

This letter is a follow-up to our meeting and inspection of the referenced sanitary wastewater treatment plant on January 26, 2011. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit. In addition, information gathered during the inspection will be utilized in determining the renewal status of the NPDES permit.

First and foremost, Agency records indicate that a **late** permit renewal application was received by Ohio EPA on January 28, 2011. As indicated to you, pursuant to the permit conditions, "**in order to receive authorization to discharge beyond**" the expiration date, a permit renewal application must be submitted no later than 180 days prior to the date of expiration. Please be advised that failure to submit a timely application in the future will result in appropriate enforcement actions by this Agency.

Inspection Findings/Compliance Status

The treatment system components consist of an influent force main, flow equalization basin, 15,000 gpd extended aeration activated sludge treatment process, final settling tank, fixed media clarifier, slow surface sand filtration and chlorination/dechlorination. The final effluent discharges to the Chagrin River.

At the time of inspection, the following observations, findings and/or comments were noted:

- The general operation and maintenance of the treatment facility appeared to be satisfactory.
- The final effluent being discharged to the receiving stream appeared to be of satisfactory visual quality.
- We understand that the County is considering the installation of UV disinfection at the facility in the near future. In order to avoid a future modification to the NPDES permit, the option of including a "Schedule of Compliance" in the proposed permit was discussed. Ideally, this option should coincide with the effluent limitation requirements for *Escherichia (E.) coli* noted below.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, January 2009 – December 2010, indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Report Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2009	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.1375	2/1/2009
February 2009	001	Total Suspended Solids	7D Conc	18	19.	2/22/2009
February 2009	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	16.	2/22/2009
February 2009	001	Nitrogen, Ammonia (NH3)	7D Qty	0.26	.3957	2/22/2009
February 2009	001	CBOD 5 day	7D Conc	15	23.7	2/22/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.038	.05	6/2/2009
June 2009	001	Total Suspended Solids	7D Conc	18	25.6666	6/8/2009
June 2009	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.59667	6/8/2009
June 2009	001	CBOD 5 day	7D Conc	15	18.9666	6/8/2009
September 2009	001	Total Suspended Solids	30D Conc	12	14.9285	9/1/2009
September 2009	001	Total Suspended Solids	7D Conc	18	30.	9/1/2009
January 2010	001	Total Suspended Solids	7D Conc	18	22.	1/1/2010
January 2010	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.7	1/1/2010
January 2010	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	11.	1/8/2010
May 2010	001	Total Suspended Solids	30D Conc	12	24.4	5/1/2010
May 2010	001	Total Suspended Solids	30D Qty	0.68	.68268	5/1/2010
May 2010	001	Total Suspended Solids	7D Conc	18	18.5	5/8/2010
May 2010	001	Total Suspended Solids	7D Conc	18	70.	5/15/2010
May 2010	001	Total Suspended Solids	7D Qty	1.02	2.30824	5/15/2010
July 2010	001	Total Suspended Solids	30D Conc	12	13.5	7/1/2010
July 2010	001	Total Suspended Solids	7D Conc	18	38.	7/15/2010

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Anticipated NPDES Permit Changes

Based on recent rule revisions, the following changes will be incorporated into the renewal permit:

- The facility will be reclassified as a Class A treatment works in accordance with Ohio Administrative Code (OAC) 3745-7. Additionally, the County must provide written notice regarding the name and certification of the designated operator(s) of record for the facility. Please complete the enclosed Operator of Record (ORC) Notification Form and return it to the specified address within 30 days of receipt of this letter.

Ms. Anastasia Gliha
Gates Mills WWTP
February 24, 2011
Page 3

- 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 until May 2012 to achieve compliance with the new requirement. **Please advise this office if you believe that such a schedule is not necessary.**

Summary/Conclusion

Based on the inspection findings and the facility's improved 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.

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/mt

Enclosure: ORC Form

cc: Chris Courtney, Village Engineer
Bob Martz, WWTP/Pump Station Supervisor

File: Public/PC/Gates Mills WWTP