



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 20, 2009

RE: STRONGSVILLE C WWTP
COMPLIANCE EVALUATION INSP.
PERMIT NO. 3PB00048
CUYAHOGA COUNTY

Mayor and Council
18688 Royalton Road
Strongsville, Ohio 44136

Dear Mayor and Council:

On October 8, 2009, an inspection of the above referenced facility's wastewater treatment plant was conducted. The facility was represented by Mr. Richard Meloy, Project Manager. The purpose of the inspection was to evaluate the operation and maintenance of the treatment plant along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

The plant design of the wastewater treatment system is 1.8 MGD. Currently the plant has been averaging 1.20 MGD since January 2007. The influent into the plant at the time of the inspection was 1.1 MGD. The plant appeared to be well operated and maintained. The facility was found to be in general compliance with its NPDES permit. At the time of the inspection all treatment units necessary to treat current flows were in service.

The following items were noted/discussed during the inspection:

1. Two of three primary settling tanks were running.
2. Two of three RBC trains were running. All gear boxes in the three trains were functional.
3. Two of three secondary settling tanks were running.
4. Two of four rapid sand filters were in operation.
5. The sludge press is operated 2-3 days per week.
6. American Water Services' contract to operate the wastewater treatment plant for the City has been extended six months.
7. The sludge press runs 2-3 days per week.
8. Agrisludge will continue hauling sludge for the City during American Water Services' contract extension.
9. The effluent was clear. No visual impact to the stream was observed.
10. The variable frequency drive is not functional on the raw water pumps. The variable drive has been out of operation since September 30, 2009. This needs to be repaired/replaced immediately.

11. Based on a discussion with Mr. Meloy, the frequency violations cited below for mercury were the result of an error in the way the data was reported. The data was submitted under reporting code 50092. The data should have been submitted under reporting code 50286.
12. The Bent Tree lift station currently serves more than 100 homes. Flow data during dry weather conditions indicates a flow of 45,000 to 50,000 gpd. Ten State Standards section 47.2 requires some type of stand-by power for all pump stations. Ohio EPA requires pump stations serving 100 + homes and greater than 40,000 gpd to have permanent stand-by power or a dual power source.
13. The Albion Rd. lift station flow data indicates a flow of approximately 30,000 gpd during dry weather conditions. However, this flow increases to upwards of 60,000 to 70,000 gpd during rain events. Permanent stand-by power or a dual power source may also be required at this lift station depending on the basis of design for this lift station. Please inform this office of the basis of design for this lift station.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2007 through September 30, 2009 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00556	Oil and Grease, Freon	1D Conc	10.0	17.3	6/6/2007
001	00530	Total Suspended Solids	30D Qty	82	82.7691	2/1/2008
001	00530	Total Suspended Solids	7D Qty	123	217.716	2/1/2008

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50286	Mercury, Total (Low Level)	1/Month	1	0	01/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	02/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	03/01/2007
601	80082	CBOD 5 day	3/Week	3	2	03/22/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	04/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	05/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	06/01/2007
581	51129	Sludge Fee Weight	2/Year	1	0	06/01/2007
601	80082	CBOD 5 day	3/Week	3	2	06/01/2007

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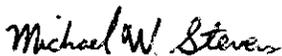
Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50286	Mercury, Total (Low Level)	1/Month	1	0	07/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	08/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	09/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	10/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	11/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	12/01/2007
581	51129	Sludge Fee Weight	2/Year	1	0	12/01/2007
586	51129	Sludge Fee Weight	1/Year	1	0	12/01/2007
001	50286	Mercury, Total (Low Level)	1/Month	1	0	01/01/2008

Please notify this office in writing within 14 days receipt of this letter your intentions to resolve items 10, 12 and 13. This letter shall include a proposed completion date for each item. A follow-up inspection will be conducted subsequent to the completion date.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt

pc: Richard B. L. Meloy, Project Manager