

**Environmental
Protection Agency**

John Kasich, Governor
Lee Fisher, Lt. Governor
Chris Koleski, Director

August 2, 2010

RE: CUYAHOGA COUNTY
CITY OF ROCKY RIVER WWTP
NPDES NO. OH0030503
OEPA NO. 3PE00009

Mayor and Council
City of Rocky River
21012 Hilliard Rd.
Rocky River, OH 44116

Dear Mayor and Council:

On July 1, 2010, a Compliance Evaluation Inspection (CEI) was conducted at the City of Rocky River Wastewater Treatment Plant (WWTP). Present during the inspection were Messrs. Jeff Harrington and Keith Bovard, representing the City of Rocky River, and this writer, of Ohio EPA. The last CEI conducted at the WWTP was on November 25, 2008.

The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of its NPDES permit; to discuss improvements made at the WWTP since the last inspection; the pending Order for Compliance which will be issued to the City by the US EPA; and the status of the upcoming NPDES Permit renewal.

At the time of the inspection the general operation and maintenance of the plant could be rated as satisfactory, and the following observations were made:

1. Contents of the primary clarifiers were brownish-gray in color and turbid. Effluent troughs were clean and the effluent was clear.
2. The fixed film reactors were in use, in the series mode.
3. The final settling tank contents were clear, and effluent troughs were clean and free of solids.
4. The chlorine contact tank contents were clear, but the surface had a slight amount of white foam present in areas of agitation.

A review of the electronic Discharge Monitoring Reports (eDMRs) submitted for the Rocky River WWTP during the period from November 1, 2008 through July 1, 2010, found the following NPDES Permit effluent numeric violations:

**ROCKY RIVER WWTP
NUMERIC EFFLUENT VIOLATIONS
NPDES PERMIT NO. 3PE00009
(11/1/08 THROUGH 7/1/10)**

| Reporting Period | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|------------------|------------------------|------------|-------|----------------|----------------|
| February 2009 | Total Suspended Solids | 7D Qty | 2498 | 3093.88 | 2/8/2009 |

** During the same November 1, 2008 through July 1, 2010 period, there were no NPDES Permit reporting code or frequency violations.

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Discussed during the July 1st inspection were the following items:

- 1) Since 2005, the engineering firm of Mackay Engineering has been the City's contracted engineer. Per Codified Ordinance, Mackay is the City Engineer for the City of Rocky River.
- 2) Since the last inspection, the following items were completed:
 - a) Approximately 500 feet of the 54 inch concrete headworks bypass pipe was relined.
 - b) The grit classifier at the WWTP headworks was replaced.
 - c) Five new mechanical bar screens, and associated electrical controls, were installed in the WWTP headworks.
 - d) The slide gate actuators on the headworks sluice gates were replaced, and connected to the WWTP SCADA system.
 - e) Currently, the #2 Settled Sewage pump is being replaced, and work should be completed by January 2011.
 - f) The chemical building HVAC improvements were completed in July 2009.
 - g) The WWTP filter building floor repairs were completed in February 2010, utilizing Federal ARRA funding
- 3) Only one odor complaint has been received this year (2010); two odor complaints were received in 2009; and one complaint was received in 2008.
- 4) Metcalf & Eddy Engineers are continuing with their biosolids compaction study, which should be completed this year.
- 5) Dewatered sludge produced at the Rocky River WWTP is rated as a Class B sludge. Dewatered sludge is hauled to the Yaworsky Farms, by the farm owner, in Huron County. Backup to the sludge land application alternative is landfilling at the Central Waste Inc. sanitary landfill, in Mahoning County. Sludge would be hauled to the landfill by Central Waste trucks.
- 6) J&J Refuse hauls grit and screenings to the Kimble sanitary landfill in Dover, Ohio.
- 7) Wastewater is treated by the trickling filters in a series mode when wastewater flows are less than 22.5 MGD, in a parallel mode when flow rates are greater than 22.5 MGD. At the time of the inspection, the trickling filters were in the series mode.
- 8) There are 18 full time employees at the Rocky River WWTP, working in 3 shifts, 24/7, with one vacant full time position.
- 9) Suspended solids, CBOD, oil & grease, phosphorus, BACT, ammonia, pH, and dissolved oxygen effluent samples are analyzed in-house, while remaining parameters (heavy metals, total kjeldahl nitrogen, nitrate-nitrite, and low level mercury) are analyzed by a commercially contracted lab (Ginosko Labs, Harpster, Ohio).

- 10) Results of the DMRQA Study 29 laboratory analysis for the unknown sample came back "acceptable" for all the parameters analyzed by the in-house lab. The results for selenium, which was analyzed by Ginosko Labs, came back "unacceptable". Ginosko labs found the problem causing the analytical error, and re-sampled, subsequently getting an "acceptable" for the selenium results.
- 11) The unknown sample for DMRQA Study 30 was being analyzed during the first week of July 2010. Results are expected in late summer.
- 12) The Excess Flow Primary (EFP) tanks have been used approximately three times in 2010, to store excessive wastewater flows during high precipitation events.
- 13) The NPDES Permit renewal application was sent in to Ohio EPA on January 26, 2010. Mr. Harrington was informed that, when drafted, the renewed Permit will contain a monitoring Station 602 requirement for a secondary internal bypass. Essentially, Station 602 will require monitoring of any flow which leaves the EFP tanks, prior to combining with the effluent (STA 001) to Lake Erie.
- 14) Renewed NPDES Permits now typically require outfall signs be installed where treated effluent is discharged to waters of the State. However, due to the fact that the Rocky River WWTP outfall extends approximately 1500 feet out into Lake Erie and is submerged, the signage requirement will not be included in the renewed NPDES Permit.
- 15) Mr. Harrington indicated he has been keeping a detailed log of his hours at the WWTP, as will be required in the new NPDES Permit. The detailed log is in accordance with the minimum staffing requirements per paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code, enacted to ensure that the treatment works operator of record is physically present at the facility per the required time.

Mr. Harrington requested clarification on the type of log book. The log book must be of a bound type, with pages sequentially numbered, and entries written in permanent ink.
- 16) Mr. Harrington indicated a reduction in the minimum staffing hours required at the WWTP will be requested. Please note that this request must be made on the appropriate form (available at our Web site: <http://epa.ohio.gov/dsw/opcert/opcert.aspx>). This form must be completed and signed by the Mayor of Rocky River, and submitted to this office for consideration.
- 17) URS Corporation, engineers under contract with the City, has installed a total of 22 flow meters for the City Wide Rocky River Flow Monitoring project. The flow monitoring program started around June 25, 2010, and is to continue for 90 days. All of Rocky River's flows, and sections where the City of Fairview enter the sewer system, are part of the flow study. Two rain gauges were also installed.

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In September 2009, the US EPA issued the City of Rocky River an Order, requiring the City to comply with the Clean Water Act, by eliminating all unpermitted sanitary sewer overflows (SSOs) from its sewage collection system.

Between October 2009 and February 2010, the City conferred with the US EPA, and subsequently proposed a work plan with compliance dates, that would outline the manner in which the City would address the elimination of the SSOs. The US EPA reviewed the proposed work plan and Order and determined it to be adequate to address the SSOs from the collection system.

In April 2010, the US EPA sent a draft copy of an Order for Compliance to the City of Rocky River. The Order for Compliance was based upon the findings of a US EPA audit of the City's WWTP, sewer collection system, and files.

Upon finalization, the US EPA Order for Compliance will require the City of Rocky River to:

- 1) Immediately begin forwarding copies of all notifications it makes to Ohio EPA, regarding the discharges of sanitary sewage from its sewage collection system, to the US EPA.
- 2) Immediately begin forwarding copies of all notifications it makes to Ohio EPA, regarding bypasses of wastewater from Station 3PE00009002 at its wastewater plant, to the US EPA.
- 3) The City must properly manage, operate, and maintain, all parts of its sewer collection system at all times.
- 4) Between February 15 and September 30, 2010, the City must perform flow monitoring at interceptors in their sewer system with diameters 18 inches or larger.
- 5) Within 180 days of finalization, the City must submit to US EPA for their approval, a schedule for conducting a Sanitary Sewer Evaluation Study (SSES), including schedule for implementation of anticipated cost effective rehabilitation or replacement work.
- 6) Within 30 days of approval of the SSES, the City must begin implementing the recommendations of the SSES on the schedule as contained within the approved SSES.
- 7) Within 180 days of receipt of the finalized Order, the City must prepare a Capacity, Management, Operation, and Maintenance (CMOM) Program for operating and maintaining all parts of its sanitary sewer system. Within 30 days of US EPA approval of the CMOM, the City must implement the program.

According to Mr. Harrington, the City of Rocky River has accepted the terms of the US EPA Order for Compliance, and is awaiting its finalization. In the interim, the City:

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- a) Has been forwarding copies of any overflow/bypass notifications to the US EPA, Ohio EPA, and the Cuyahoga County Board of Health.
- b) Has contracted with URS Consultants to conduct the sewer system flow monitoring, which was started in June 2010.
- c) Has the CMOM drafted and handed over for review by URS, and is awaiting any comments or changes.

The City of Rocky River should maintain its efforts at providing the best quality effluent from the WWTP as possible. Continued cooperation with the US EPA towards the reduction and elimination of SSOs in the collection system should be one of the City's primary goals in the upcoming several years. If there are any comments or questions regarding this correspondence, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

cc: Jeff Harrington, Supt., City of Rocky River WWTP