OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Rd.
Twinsburg, Ohio 44087
TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 28, 2009

RE: CUYAHOGA FALLS WTP
3IZ00010*ED
SUMMIT COUNTY

Mr. Dave Young
City of Cuyahoga Falls
2310 2nd Street
Cuyahoga Falls, Ohio 44221

Dear Mr. Young:

On December 22, 2009 this writer met with Paul Huff, Cuyahoga Falls WTP, to discuss recent non-compliance issues with the above referenced NPDES permit. A compliance review for the time period of January 2007 through November 2009 revealed the following violations:

Numerical Violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	Iron, Suspended (Fe)	1D Conc	2000	3550.	3/18/2007
601	Chloride, Total	1D Qty	3701	3883.41	12/25/2007
601	Chloride, Total	1D Qty	3701	3803.92	7/21/2008
601	Chloride, Total	1D Qty	3701	3832.31	8/4/2008
601	Chloride, Total	1D Qty	3701	4087.8	9/4/2008
601	Chloride, Total	1D Qty	3701	6273.63	1/6/2009
601	Chloride, Total	1D Qty	3701	4825.87	1/20/2009
601	Chloride, Total	1D Qty	3701	4825.87	1/21/2009
601	Chloride, Total	1D Qty	3701	4036.70	10/7/2009

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	Flow Rate	1/Day	1	0	01/01/2007
601	Iron, Suspended (Fe)	3/Week	3	0	01/01/2007
601	Manganese, Suspended (	3/Week	3	0	01/01/2007
601	Flow Rate	1/Day	1	0	01/02/2007
601	Flow Rate	1/Day	1	0	01/03/2007
601	Flow Rate	1/Day	1	0	01/04/2007
601	Flow Rate	1/Day	1	0	01/05/2007

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	Flow Rate	1/Day	1	0	01/06/2007
601	Flow Rate	1/Day	1	0	01/07/2007
601	Flow Rate	1/Day	1	0	01/08/2007
601	Iron, Suspended (Fe)	3/Week	3	0	01/08/2007
601	Manganese, Suspended (	3/Week	3	0	01/08/2007
601	Flow Rate	1/Day	1	0	01/09/2007
601	Flow Rate	1/Day	1	0	01/10/2007
601	Flow Rate	1/Day	1	0	01/11/2007
601	Flow Rate	1/Day	1	0	01/12/2007
601	Flow Rate	1/Day	1	0	01/13/2007
601	Flow Rate	1/Day	1	0	01/14/2007
601	Flow Rate	1/Day	1	0	01/15/2007
601	Iron, Suspended (Fe)	3/Week	3	0	01/15/2007
601	Manganese, Suspended (	3/Week	3	0	01/15/2007
601	Flow Rate	1/Day	1	0	01/16/2007
601	Flow Rate	1/Day	1	0	01/17/2007
601	Flow Rate	1/Day	1	0	01/18/2007
601	Flow Rate	1/Day	1	0	01/19/2007
601	Flow Rate	1/Day	1	0	01/20/2007
601	Flow Rate	1/Day	1	0	01/21/2007
601	Flow Rate	1/Day	1	0	01/22/2007
601	Iron, Suspended (Fe)	3/Week	3	0	01/22/2007
601	Manganese, Suspended (	3/Week	3	0	01/22/2007
601	Flow Rate	1/Day	1	0	01/23/2007
601	Flow Rate	1/Day	1	0	01/24/2007
601	Flow Rate	1/Day	1	0	01/25/2007
601	Flow Rate	1/Day	1	0	01/26/2007
601	Flow Rate	1/Day	1	0	01/27/2007
601	Flow Rate	1/Day	1	0	01/28/2007
601	Flow Rate	1/Day	1	0	01/29/2007
601	Flow Rate	1/Day	1	0	01/30/2007
601	Flow Rate	1/Day	1	0	01/31/2007
601	Flow Rate	1/Day	1	0	02/01/2007
601	Iron, Suspended (Fe)	3/Week	3	0	02/01/2007
601	Manganese, Suspended (	3/Week	3	0	02/01/2007
601	Flow Rate	1/Day	1	0	02/02/2007
601	Flow Rate	1/Day	1	0	02/03/2007
601	Flow Rate	1/Day	1	0	02/04/2007
601	Flow Rate	1/Day	1	0	02/05/2007
601	Flow Rate	1/Day	1	0	02/06/2007
601	Flow Rate	1/Day	1	0	02/07/2007
601	Flow Rate	1/Day	1	0	02/08/2007

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	Iron, Suspended (Fe)	3/Week	3	0	02/08/2007
601	Manganese, Suspended (	3/Week	3	0	02/08/2007
601	Flow Rate	1/Day	1	0	02/09/2007
601	Flow Rate	1/Day	1	0	02/10/2007
601	Flow Rate	1/Day	1	0	02/11/2007
601	Flow Rate	1/Day	1	0	02/12/2007
601	Flow Rate	1/Day	1	0	02/13/2007
601	Flow Rate	1/Day	1	0	02/14/2007
601	Flow Rate	1/Day	1	0	02/15/2007
601	Iron, Suspended (Fe)	3/Week	3	0	02/15/2007
601	Manganese, Suspended (	3/Week	3	0	02/15/2007
601	Flow Rate	1/Day	1	0	02/16/2007
601	Flow Rate	1/Day	1	0	02/17/2007
601	Flow Rate	1/Day	1	0	02/18/2007
601	Flow Rate	1/Day	1	0	02/19/2007
601	Flow Rate	1/Day	1	0	02/20/2007
601	Flow Rate	1/Day	1	0	02/21/2007
601	Flow Rate	1/Day	1	0	02/22/2007
601	Iron, Suspended (Fe)	3/Week	3	0	02/22/2007
601	Manganese, Suspended (	3/Week	3	0	02/22/2007
601	Residue, Total Dissolv	1/Week	1	0	02/22/2007
601	Flow Rate	1/Day	1	0	02/23/2007
601	Flow Rate	1/Day	1	0	02/24/2007
601	Flow Rate	1/Day	1	0	02/25/2007
601	Flow Rate	1/Day	1	0	02/26/2007
601	Flow Rate	1/Day	1	0	02/27/2007
601	Flow Rate	1/Day	1	0	02/28/2007
601	Flow Rate	1/Day	1	0	03/01/2007
601	Flow Rate	1/Day	1	0	03/02/2007
601	Flow Rate	1/Day	1	0	03/03/2007
601	Flow Rate	1/Day	1	0	03/04/2007
601	Flow Rate	1/Day	1	0	03/05/2007
601	Flow Rate	1/Day	1	0	03/06/2007
601	Flow Rate	1/Day	1	0	03/07/2007
601	Flow Rate	1/Day	1	0	03/08/2007
601	Flow Rate	1/Day	1	0	03/09/2007
601	Flow Rate	1/Day	1	0	03/10/2007
601	Flow Rate	1/Day	1	0	03/11/2007
601	Flow Rate	1/Day	1	0	03/12/2007
601	Flow Rate	1/Day	1	0	03/13/2007
601	Flow Rate	1/Day	1	0	03/14/2007
601	Flow Rate	1/Day	1	0	03/15/2007

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	Flow Rate	1/Day	1	0	03/16/2007
601	Flow Rate	1/Day	1	0	03/17/2007
601	Flow Rate	1/Day	1	0	03/18/2007
601	Flow Rate	1/Day	1	0	03/19/2007
601	Flow Rate	1/Day	1	0	03/20/2007
601	Flow Rate	1/Day	1	0	03/21/2007
601	Flow Rate	1/Day	1	0	03/22/2007
601	Flow Rate	1/Day	1	0	03/23/2007
601	Flow Rate	1/Day	1	0	03/24/2007
601	Flow Rate	1/Day	1	0	03/25/2007
601	Flow Rate	1/Day	1	0	03/26/2007
601	Flow Rate	1/Day	1	0	03/27/2007
601	Flow Rate	1/Day	1	0	03/28/2007
601	Flow Rate	1/Day	1	0	03/29/2007
601	Flow Rate	1/Day	1	0	03/30/2007
601	Flow Rate	1/Day	1	0	03/31/2007
601	Flow Rate	1/Day	1	0	08/23/2007
601	Flow Rate	1/Day	1	0	08/24/2007
601	Flow Rate	1/Day	1	0	08/25/2007
601	Flow Rate	1/Day	1	0	08/26/2007
601	Flow Rate	1/Day	1	0	08/27/2007
601	Flow Rate	1/Day	1	0	08/28/2007
601	Flow Rate	1/Day	1	0	08/29/2007
601	Flow Rate	1/Day	1	0	08/30/2007
601	Flow Rate	1/Day	1	0	08/31/2007
601	Residue, Total Dissolv	3/Week	3	1	09/01/2007
601	Residue, Total Dissolv	3/Week	3	1	09/08/2007
601	Residue, Total Dissolv	3/Week	3	1	09/15/2007
601	Residue, Total Dissolv	3/Week	3	1	09/22/2007
601	Residue, Total Dissolv	3/Week	3	1	10/01/2007
601	Residue, Total Dissolv	3/Week	3	1	10/08/2007
601	Residue, Total Dissolv	3/Week	3	1	10/15/2007
601	Residue, Total Dissolv	3/Week	3	1	10/22/2007
601	Residue, Total Dissolv	3/Week	3	1	11/01/2007
601	Residue, Total Dissolv	3/Week	3	1	11/08/2007
601	Residue, Total Dissolv	3/Week	3	1	11/15/2007
601	Residue, Total Dissolv	3/Week	3	1	11/22/2007
601	Residue, Total Dissolv	3/Week	3	1	12/01/2007
601	Residue, Total Dissolv	3/Week	3	1	12/08/2007
601	Residue, Total Dissolv	3/Week	3	1	12/15/2007
601	Residue, Total Dissolv	3/Week	3	1	12/22/2007
601	Residue, Total Dissolv	3/Week	3	1	01/01/2008

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	Residue, Total Dissolv	3/Week	3	1	01/08/2008
601	Residue, Total Dissolv	3/Week	3	1	01/15/2008
601	Residue, Total Dissolv	3/Week	3	1	01/22/2008
601	Residue, Total Dissolv	3/Week	3	1	02/01/2008
601	Residue, Total Dissolv	3/Week	3	1	02/08/2008
601	Residue, Total Dissolv	3/Week	3	1	02/15/2008
601	Residue, Total Dissolv	3/Week	3	1	02/22/2008
601	Residue, Total Dissolv	3/Week	3	1	03/01/2008
601	Residue, Total Dissolv	3/Week	3	1	03/08/2008
601	Residue, Total Dissolv	3/Week	3	1	03/15/2008
601	Residue, Total Dissolv	3/Week	3	1	03/22/2008
601	Residue, Total Dissolv	3/Week	3	1	04/01/2008
601	Residue, Total Dissolv	3/Week	3	1	04/08/2008
601	Residue, Total Dissolv	3/Week	3	1	04/15/2008
601	Residue, Total Dissolv	3/Week	3	1	04/22/2008
601	Residue, Total Dissolv	3/Week	3	1	05/01/2008
601	Residue, Total Dissolv	3/Week	3	1	05/08/2008
601	Residue, Total Dissolv	3/Week	3	1	05/15/2008
601	Residue, Total Dissolv	3/Week	3	1	05/22/2008
601	Residue, Total Dissolv	3/Week	3	1	06/01/2008
601	Residue, Total Dissolv	3/Week	3	1	06/08/2008
601	Residue, Total Dissolv	3/Week	3	1	06/15/2008
601	Residue, Total Dissolv	3/Week	3	1	06/22/2008
601	Residue, Total Dissolv	3/Week	3	1	07/01/2008
601	Residue, Total Dissolv	3/Week	3	1	07/08/2008
601	Residue, Total Dissolv	3/Week	3	1	07/15/2008
601	Residue, Total Dissolv	3/Week	3	1	07/22/2008
601	Residue, Total Dissolv	3/Week	3	1	08/01/2008
601	Residue, Total Dissolv	3/Week	3	1	08/08/2008
601	Residue, Total Dissolv	3/Week	3	1	08/15/2008
601	Residue, Total Dissolv	3/Week	3	1	08/22/2008
601	pH	3/Week	3	2	10/22/2008
601	Total Suspended Solids	1/Month	1	0	06/01/2009
601	pH	3/Week	3	2	11/01/2009
601	Chloride, Total	3/Week	3	2	11/01/2009
601	Residue, Total Dissolv	3/Week	3	2	11/01/2009
601	pH	3/Week	3	0	11/08/2009
601	Chloride, Total	3/Week	3	0	11/08/2009
601	Residue, Total Dissolv	3/Week	3	0	11/08/2009

The frequency violations in 2007 and 2008 were reportedly a result of not understanding the definition of week for the NPDES permit. Once understood, these violations were avoided for most of 2009. The November 2009 violations are of concern. These violations reportedly occurred because of a problem which arose with taking the sample. Mr. Huff explained to me that the sample is automatically taken by composite sampler through a suction tube in a manhole located just north of the water plant building. Usually, sand bags or other devices are used to create a liquid pool at the bottom of the manhole. At some point before November 2009 the device used to create the pool was washed away and the sampler lost suction. What concerns this office is that this was a known situation that was not fixed and therefore the samples were not taken. A more permanent sample location needs to be installed or a commitment made to visually monitor on a daily basis the device needed to maintain the suction pool. Please respond to this office in writing no later than January 8, 2009 with your resolution to this matter.

If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,

Phil Rhodes

Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/mt