



Environmental
Protection Agency

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

June 20, 2011

RE: NPDES PERMIT # 3IV00230
VILLAGE OF FAIRPORT HARBOR
WATER TREATMENT PLANT
LAKE COUNTY
INDUSTRIAL

Mayor and Council
Village of Fairport Harbor
220 Third Street
Fairport Harbor, Ohio 44077

Ladies and Gentlemen:

On June 15, 2011, this writer conducted a compliance evaluation inspection of the process water treatment system at the village's water treatment plant. The purpose of the inspection was to evaluate the operation and maintenance condition of the process water treatment system, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. Mr. Chris York, Senior Plant Operator represented the village during the inspection.

Two activities result in the generation of process water - backwash water generated from the backwashing of the rapid sand filters and the wastewater generated from the hosing down of the solids in the settling basin. These two sources of process water are discharged to the backwash water holding tank. The backwash water treatment consists of polymer flocculation, dechlorination and settling. After at least 24 hours of retention, the supernatant from the backwash holding tank is discharged through Outfall 003 to the Grand River. Sludge accumulated in the tank is pumped and hauled to American Landfill in Central Ohio. Laboratory analyses for the NPDES permit are performed by Alloway Environmental in Marion, Ohio.

At the time of inspection, the plant was producing an effluent of satisfactory visual quality, in that there was no evidence of suspended solids or oil and grease. Operation and maintenance conditions of the treatment units were satisfactory.

During the inspection, Mr. York stated that the village is considering the purchase of geotextile tubes to reduce the amount of water from the sludge prior to the hauling of the sludge. Be advised that the process water generated from the dewatering of the sludge may not be discharged to storm water drains. Any process water generated should be returned to the process water treatment system. Please submit to this office a brief description of the treatment process to aid in determining if a Permit-to-Install (PTI) application and detail plans will be required.

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A review of the Discharge Monitoring Reports (DMRs) covering December 2008 through April 2011 revealed no effluent limitation violations.

A review of the DMRs shows that when the chlorine residual concentrations are below the method detection limit of the pollutant, the AA data substitution code is reported on the DMRs, as required. However the method detection limit used for the test is reported in the comment section of the DMR as zero. Method detection limits are typically some number greater than zero. Please refer to the manufacturer's manual of the chlorine residual test kit for the estimated method detection limit listed for the equipment. The specific procedures for determining method detection limits are found in Appendix B of Chapter 40, Part 136 of the Code of Federal Regulations.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Also, the existing NPDES permit will expire January 31, 2012. Pursuant to Ohio Administrative Code 3745-33-08 an NPDES permit renewal application must be submitted 180 days prior to the expiration of the existing NPDES permit. Failure to do so is a violation of the Ohio Administrative Code.

Once this office receives a complete NPDES permit application, the permit will be drafted thereafter. When the draft permit is public noticed, please review it carefully. A thirty-day comment period will be provided. Any concerns regarding the draft permit must be submitted to this district office in writing.

Should you have questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/mt

cc: David McGuirk, Village Administrator
Chris York, Sr. Plant Operator