



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

January 8, 2009

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

Mr. Tom Hilston, Village Administrator  
Village of Fairport Harbor  
220 Third Street  
Fairport Harbor, Ohio 44077

Dear Mr. Hilston:

On January 6, 2009, this writer conducted a compliance evaluation inspection of the filter backwash 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.

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 a landfill.

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.

On the day of inspection, this writer had to come to the water plant two times before being escorted into the plant. The first time, the front gate was locked, as required, but no one was aware that there was an inspector out front, because the operator was performing his laboratory analyses. This writer left and returned an hour later. Once again, the gate was locked and the operator was not aware that there was an inspector wanting to enter the plant. As this writer was backing out the driveway to go to the Village Hall to telephone the plant operator, the operator noticed the car leaving and ran outside to unlock the gate. This writer recommends that the Village invest in an outdoor buzzer at the plant that would provide inside, audible notification when inspectors or delivery personnel wish to enter the plant.

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A review of the Discharge Monitoring Reports (DMRs) covering July 2006 through November 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
003	00400	pH	1D Conc	6.5	6.4	4/27/2007
003	00530	Total Suspended Solids	1D Qty	2.81	12.2634	4/24/2008
003	00530	Total Suspended Solids	1D Qty	2.81	6.813	4/25/2008
003	00530	Total Suspended Solids	30D Qty	2.11	2.91256	4/01/2008

A review of the DMRs shows that chlorine residual concentrations are reported as zero. This is not the correct way to report the concentrations for this parameter. It should be reported using the applicable data substitution code (A Code). For concentrations that cannot be detected, the AA substitution code (constituting below detectable limit) should be used, while reporting the method detection limit for the test method in the comment section of the form.

Also, this office does not have record of receipt of the DMRs for October 2007 and November 2008. Please immediately submit the required analytical data.

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.

Please inform this office, in writing, within ten days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

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