



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

February 28, 2008

RE: NEFF PERKINS COMPANY  
LAKE COUNTY  
PERMIT NO. 3IR00035

Mr. Dave Gazella, EHS Manager  
Neff Perkins Company  
3715 Parmly Road  
Perry, OH 44081

Dear Mr. Gazella:

On February 26, 2008, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Darryl Mills, Maintenance. 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.

During the inspection, the following items were noted:

1. The design flow of the extended aeration wastewater treatment plant is 5,000 gallons per day.
2. The package plant currently serves 20 employees.
3. The blowers were running and the plant was receiving good aeration.
4. The content of the aeration tank was medium brown in color and no foam was present. This is typical of a properly operating plant.
5. Both the skimmer and sludge return lines were functioning properly. The sludge return line was also medium brown in color.
6. There was scum build-up behind the baffle in the settling tank (see Figure 1). The scum should be removed. Mr. Mills indicated that the scum accumulation behind the baffle in the clarifier is routinely removed and placed back in the aeration tank.
7. The surface sand filter beds were not evaluated due to heavy snowfall the prior day.
8. Flow is determined by reading the water meter in the plant.
9. The plant appeared to be well maintained and operated.
10. Ake Laboratory Research collects the samples and performs the lab analysis.
11. Ake Laboratory also pumps out the clarifier as needed.
12. Chlorination and dechlorination tablets are placed in their respective dispensers every Monday during summer. Summer is defined as May 1<sup>st</sup> through October 31<sup>st</sup>.

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13. Mr. Mills was informed that a Web-based application for submitting the monthly operating report is currently available. Web addresses are available below which provide information on this topic along with training dates.

This office has recently reviewed your self-monitoring reports covering the period July 1, 2006, through December 31, 2007 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
003	50060	Chlorine, Total Residu	1D Conc	0.019	1.	8/7/2006

### FREQUENCY VIOLATIONS

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
9/1/2006	003	00083	Color, Severity	1/Week	1	0
9/8/2006	003	00083	Color, Severity	1/Week	1	0
9/15/2006	003	00083	Color, Severity	1/Week	1	0
9/1/2006	003	01330	Odor, Severity	1/Week	1	0
9/8/2006	003	01330	Odor, Severity	1/Week	1	0
9/15/2006	003	01330	Odor, Severity	1/Week	1	0
9/1/2006	003	01350	Turbidity, Severity	1/Week	1	0
9/8/2006	003	01350	Turbidity, Severity	1/Week	1	0
9/15/2006	003	01350	Turbidity, Severity	1/Week	1	0
7/8/2006	003	00083	Color, Severity	1/Week	1	0
7/8/2006	003	01330	Odor, Severity	1/Week	1	0
7/8/2006	003	01350	Turbidity, Severity	1/Week	1	0
3/1/2007	003	00083	Color, Severity	1/Week	1	0
3/8/2007	003	00083	Color, Severity	1/Week	1	0
3/1/2007	003	01330	Odor, Severity	1/Week	1	0
3/8/2007	003	01330	Odor, Severity	1/Week	1	0
3/1/2007	003	01350	Turbidity, Severity	1/Week	1	0
3/8/2007	003	01350	Turbidity, Severity	1/Week	1	0
2/22/2007	003	00083	Color, Severity	1/Week	1	0
2/22/2007	003	01330	Odor, Severity	1/Week	1	0
2/22/2007	003	01350	Turbidity, Severity	1/Week	1	0
9/8/2007	003	00083	Color, Severity	1/Week	1	0
9/15/2007	003	00083	Color, Severity	1/Week	1	0
9/22/2007	003	00083	Color, Severity	1/Week	1	0
9/8/2007	003	01330	Odor, Severity	1/Week	1	0
9/15/2007	003	01330	Odor, Severity	1/Week	1	0

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Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
9/22/2007	003	01330	Odor, Severity	1/Week	1	0
9/8/2007	003	01350	Turbidity, Severity	1/Week	1	0
9/15/2007	003	01350	Turbidity, Severity	1/Week	1	0
9/22/2007	003	01350	Turbidity, Severity	1/Week	1	0
10/1/2007	003	00083	Color, Severity	1/Week	1	0
10/8/2007	003	00083	Color, Severity	1/Week	1	0
10/15/2007	003	00083	Color, Severity	1/Week	1	0
10/1/2007	003	01330	Odor, Severity	1/Week	1	0
10/8/2007	003	01330	Odor, Severity	1/Week	1	0
10/15/2007	003	01330	Odor, Severity	1/Week	1	0
10/1/2007	003	01350	Turbidity, Severity	1/Week	1	0
10/8/2007	003	01350	Turbidity, Severity	1/Week	1	0
10/15/2007	003	01350	Turbidity, Severity	1/Week	1	0

Please note that Ohio EPA has converted from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**. The new reporting system is entirely Web based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs). User training is going to be available in early 2008. Please consult the following Web site for updates regarding the specific date:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMRtraining.html>

If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site.

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

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*

Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt



Figure 1