Mun.

Geauga Co
Troy Oaks
PC

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

April 7, 2009

RE: GEAUGA COUNTY TROY OAKS WWTP
PERMIT NUMBER 3PG00079
NPDES COMPLIANCE EVALUATION INSPECTION

Geauga Board of County Commissioners
470 Center Street, Building #4
Chardon, Ohio 44024-1068

Dear Board of County Commissioners:

On March 20, 2009 I met with Doug Bowen, Geauga County Sanitary Engineer, and Jim Reader, Operations Supervisor for Geauga County Water Resources Department, to conduct an inspection of the Troy Oaks wastewater treatment plant (WWTP). The purpose of the inspection was to evaluate the county's compliance with respect to the terms and conditions of their National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit for this facility expires May 31, 2010.

The 60,000-gallon-per-day WWTP, which serves Great Lakes Cheese and other industries as well as a residential area, comprises a trash trap, flow equalization, extended aeration tanks, clarifier, rapid sand filters, ultraviolet (UV) disinfection system, and aerated sludge holding tank. This steel plant suffers from severe corrosion, and it may need a major maintenance effort. The plant discharges directly to Akron's LaDue Reservoir, a part of their municipal water system.

Review of the electronically submitted digital monitoring reports (EDMR's) received by the Ohio EPA for the period March 2008 through March 2009, indicates frequent failure to comply with the permitted final effluent limitations. To summarize the enclosed listing of violations:

Parameter	Number of Violations
Dissolved oxygen	5
pH	1
Total Suspended Solids	5
Nitrogen, Ammonia (NH3)	4
Phosphorous	39
CBOD 5 day	2

The County committed a total of 55 violations between March 2008 and March 2009. Ten of the twelve months under review were in violation. Of particular note are the Nitrogen Ammonia and Phosphorous violations. Nitrogen and Phosphorous are nutrients that significantly increase growth of plant life in the Reservoir.

Please be advised that violations of the terms and conditions of your NPDES permit may leave you subject to enforcement actions pursuant to ORC Chapter 6111.

If there are comments or questions regarding this letter, please call me directly at (330) 963-1260.

Sincerely,

Douglas Hiestand
Environmental Engineer
Division of Surface Water

DH/mt

enclosure

File: Muni/Geauga Troy Oaks/PC

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PG00079*GD	March 2008	001	00665	Phosphorus, Total (P)	30D Qty	0.23	.25084	3/1/2008
3PG00079*GD	March 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.40322	3/1/2008
3PG00079*GD	March 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.03	3/8/2008
3PG00079*GD	March 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.24951	3/8/2008
3PG00079*GD	April 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.2	4/8/2008
3PG00079*GD	April 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.18	4/15/2008
3PG00079*GD	May 2008	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.162	5/1/2008
3PG00079*GD	May 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.45	5/1/2008
3PG00079*GD	May 2008	001	00665	Phosphorus, Total (P)	30D Qty	0.23	.24432	5/1/2008
3PG00079*GD	May 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.25882	5/1/2008
3PG00079*GD	May 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.2	5/8/2008
3PG00079*GD	May 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.3897	5/8/2008
3PG00079*GD	June 2008	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.064	6/1/2008
3PG00079*GD	June 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.3	6/1/2008
3PG00079*GD	June 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.2598	6/1/2008
3PG00079*GD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	3.7	6/2/2008
3PG00079*GD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	3.1	6/3/2008
3PG00079*GD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.9	6/18/2008
3PG00079*GD	June 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.4	6/22/2008
3PG00079*GD	June 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.30098	6/22/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.745	7/1/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	30D Qty	0.23	.40371	7/1/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	3.42	7/8/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.85435	7/8/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.4	7/15/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.37623	7/15/2008
3PG00079*GD	July 2008	001	00400	pH	1D Conc	6.5	6.28	7/18/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.4	7/22/2008
3PG00079*GD	July 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.24905	7/22/2008
3PG00079*GD	August 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.1	8/1/2008
3PG00079*GD	August 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.3	8/8/2008
3PG00079*GD	August 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.28637	8/8/2008
3PG00079*GD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	3.2875	9/1/2008
3PG00079*GD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.45	.55528	9/1/2008
3PG00079*GD	September 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.5	9/1/2008

3PG00079*GD	September 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.26855	9/1/2008
3PG00079*GD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	13.	9/22/2008
3PG00079*GD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.68	2.19454	9/22/2008
3PG00079*GD	September 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	4.9	9/29/2008
3PG00079*GD	September 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.	9/30/2008
3PG00079*GD	October 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.1	10/15/2008
3PG00079*GD	October 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.2623	10/15/2008
3PG00079*GD	October 2008	001	00530	Total Suspended Solids	7D Conc	18	20.	10/22/2008
3PG00079*GD	October 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.9	10/22/2008
3PG00079*GD	October 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.35238	10/22/2008
3PG00079*GD	November 2008	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.06375	11/1/2008
3PG00079*GD	November 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	2.4	11/1/2008
3PG00079*GD	November 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.51296	11/1/2008
3PG00079*GD	November 2008	001	00665	Phosphorus, Total (P)	7D Conc	1.0	1.25	11/8/2008
3PG00079*GD	November 2008	001	00665	Phosphorus, Total (P)	7D Qty	0.23	.288	11/8/2008
3PG00079*GD	February 2009	001	00530	Total Suspended Solids	30D Conc	12	16.2	2/1/2009
3PG00079*GD	February 2009	001	00530	Total Suspended Solids	30D Qty	2.7	3.08023	2/1/2009
3PG00079*GD	February 2009	001	00530	Total Suspended Solids	7D Conc	18	34.	2/22/2009
3PG00079*GD	February 2009	001	00530	Total Suspended Solids	7D Qty	4.1	6.41179	2/22/2009
3PG00079*GD	February 2009	001	80082	CBOD 5 day	7D Conc	15	18.3	2/22/2009
3PG00079*GD	February 2009	001	80082	CBOD 5 day	7D Qty	3.4	3.42694	2/22/2009

Permit No	Reporting Period		Station	Reporting Code		Parameter	Sample Frequency	Expected	Reported	Violation Date
3PG00079*GD	June	2008	601	00400	pH		1/2Weeks	1	0	06/01/2008
3PG00079*GD	June	2008	601	00400	pH		1/2Weeks	1	0	06/15/2008