



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

November 18, 2008

RE: SUMMIT COUNTY  
VILLAGE OF RICHFIELD  
RICHFIELD HILLS WWTP  
OHIO EPA PERMIT NO. 3PH00003  
COMPLIANCE EVALUATION INSPECTION

**CERTIFIED MAIL**

Mr. Randy Kertesz, President  
3439 W. Brainard Road  
Suite 260  
Woodmere, OH 44122

Dear Mr. Kertesz:

On November 5, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the Richfield Hills wastewater treatment plant. Present during the inspection was your technical operator, Mr. Steve Howe of AKE Laboratory. The existing 130,000 gpd extended aeration treatment plant consists of a manual bar screen, comminutor, extended aeration plant, settling/clarification, rapid sand filters (which are being utilized as slow sand filters), chlorination/dechlorination, aerated sludge holding tank, and sludge drying beds.

During the inspection, the following observations were noted:

- It's understood the comminutor is out of service. This does not appear to be affecting the plant's overall performance.
- The ultrasonic flow meter is out of service; a new one has been ordered.
- The color of the mixed liquor appeared to be slightly dark in color; Mr. Howe said the darker color is normal for this plant. This office feels it may be time to waste solids from the plant.
- The weir troughs in the clarifier were full of solids. It's understood that this is a normal occurrence at this plant. This office recommends this problem be remedied and/or the solids be removed on a more frequent basis. Otherwise, there is a good chance of solids overflowing the clarifier weirs.
- The skimmer box and sludge return were operating properly.
- The rapid sand filters, which have been utilized as slow sand filters, were flooded almost to the top of the tank. Mr. Howe explained that they never overflow, and do drain properly. We could hear them draining.
- The sludge drying beds were not being utilized. It's understood liquid sludge is hauled to the City of Bedford Heights WWTP, in accordance with your sludge management plan.

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- The plant's phosphorus removal system is still not being utilized.
- The effluent in the chlorination/dechlorination tank appeared to be clear of visible solids.
- As previously requested by this office, the blower building contained the required hardbound logbook, detailing the daily operations at the plant. A tarp was still covering the roof of the blower building; supposedly the roof is about to be replaced.

Upon review of the electronic Discharge Monitoring Reports (eDMR's) submitted for the plant from October 1, 2006 through October 1, 2008, the following effluent violations were noted:

| Reporting Period | Parameter               | Limit Type | Limit | Reported Value | Violation Date |
|------------------|-------------------------|------------|-------|----------------|----------------|
| December 2006    | Total Suspended Solids  | 30D Conc   | 12    | 12.2222        | 12/1/2006      |
| December 2006    | Total Suspended Solids  | 7D Conc    | 18    | 24.            | 12/8/2006      |
| February 2007    | Total Suspended Solids  | 30D Conc   | 12    | 95.            | 2/1/2007       |
| February 2007    | Total Suspended Solids  | 7D Conc    | 18    | 28.            | 2/1/2007       |
| February 2007    | Total Suspended Solids  | 30D Qty    | 5.9   | 9.41708        | 2/1/2007       |
| February 2007    | Nitrogen, Ammonia (NH3) | 30D Conc   | 4.0   | 18.25          | 2/1/2007       |
| February 2007    | Total Suspended Solids  | 7D Conc    | 18    | 185.333        | 2/15/2007      |
| February 2007    | Total Suspended Solids  | 7D Qty     | 8.9   | 18.5515        | 2/15/2007      |
| February 2007    | Total Suspended Solids  | 7D Conc    | 18    | 26.5           | 2/22/2007      |
| February 2007    | Nitrogen, Ammonia (NH3) | 7D Conc    | 6.0   | 18.25          | 2/22/2007      |
| April 2007       | Total Suspended Solids  | 30D Conc   | 12    | 15.            | 4/1/2007       |
| April 2007       | Total Suspended Solids  | 7D Conc    | 18    | 18.5           | 4/15/2007      |
| May 2007         | pH                      | 1D Conc    | 9.0   | 9.2            | 5/10/2007      |
| June 2007        | Nitrogen, Ammonia (NH3) | 30D Conc   | 1.5   | 5.6            | 6/1/2007       |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 5.6            | 6/4/2007       |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 4.1            | 6/11/2007      |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 4.6            | 6/12/2007      |
| June 2007        | Nitrogen, Ammonia (NH3) | 7D Conc    | 2.3   | 5.6            | 6/15/2007      |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 4.9            | 6/19/2007      |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 5.4            | 6/20/2007      |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 3.6            | 6/21/2007      |
| June 2007        | Total Suspended Solids  | 7D Conc    | 18    | 22.            | 6/22/2007      |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 3.7            | 6/22/2007      |
| June 2007        | Dissolved Oxygen        | 1D Conc    | 6.0   | 3.5            | 6/25/2007      |
| September 2007   | Dissolved Oxygen        | 1D Conc    | 6.0   | 5.4            | 9/13/2007      |
| January 2008     | Nitrogen, Ammonia (NH3) | 30D Conc   | 4.0   | 6.99667        | 1/1/2008       |
| January 2008     | Total Suspended Solids  | 7D Conc    | 18    | 20.5           | 1/22/2008      |
| February 2008    | Total Suspended Solids  | 30D Conc   | 12    | 17.5555        | 2/1/2008       |
| February 2008    | Total Suspended Solids  | 7D Conc    | 18    | 39.5           | 2/1/2008       |
| February 2008    | Nitrogen, Ammonia (NH3) | 30D Conc   | 4.0   | 5.34           | 2/1/2008       |
| February 2008    | Nitrogen, Ammonia (NH3) | 7D Conc    | 6.0   | 10.            | 2/8/2008       |
| March 2008       | Dissolved Oxygen        | 1D Conc    | 6.0   | 4.5            | 3/10/2008      |

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| Reporting Period | Parameter              | Limit Type | Limit | Reported Value | Violation Date |
|------------------|------------------------|------------|-------|----------------|----------------|
| June 2008        | Dissolved Oxygen       | 1D Conc    | 6.0   | 5.1            | 6/6/2008       |
| August 2008      | Total Suspended Solids | 30D Conc   | 12    | 15.            | 8/1/2008       |
| August 2008      | Total Suspended Solids | 7D Conc    | 18    | 44.            | 8/1/2008       |
| August 2008      | Total Suspended Solids | 7D Conc    | 18    | 20.5           | 8/8/2008       |
| August 2008      | Dissolved Oxygen       | 1D Conc    | 6.0   | 5.7            | 8/20/2008      |
| September 2008   | Total Suspended Solids | 30D Conc   | 12    | 22.2857        | 9/1/2008       |
| September 2008   | Total Suspended Solids | 7D Conc    | 18    | 18.5           | 9/1/2008       |
| September 2008   | Total Suspended Solids | 7D Conc    | 18    | 98.            | 9/8/2008       |

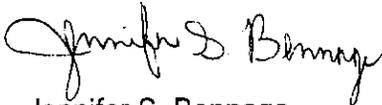
Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111.

As was discussed back in 2001, a permit-to-install (PTI) is required from Ohio EPA for the rapid sand filters to be utilized as slow sand filters. Or, your P.E. may determine that a brand new slow surface sand filter is needed to be constructed.

Four sets of detail plans of the "as built" modifications or a new slow surface sand filter, along with the design calculations, must be prepared and stamped by a Professional Engineer and submitted to this office. The detail plans will be forwarded to the Director's Office with our recommendations. The enclosed Plan Approval Procedures must be followed. All fees, applications, and data sheets must be completed and included with the submission of detail plans before the plans can be processed for approval.

In conclusion, this office is concerned with the plant's numerous effluent violations. As soon as possible, it is directed you respond in writing with your intentions regarding compliance. If you have any questions regarding this letter, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage  
 Environmental Engineer  
 Division of Surface Water

JSB/mt

cc: Steve Howe, AKE Laboratory, Inc.  
 Greg Dewhurst, PUCO  
 Jim Wing, PUCO  
 Mayor Lyons, Village of Richfield  
 Bill Skowronski, District Chief, Ohio EPA, DO, NED

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Sent To MR. RANDY KERTESZ, PRESIDENT  
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