



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 8, 2010

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

**CERTIFIED MAIL**

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

Dear Mr. Kertesz:

On February 3, 2010, a Pre-Permit Inspection/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 surface sand filters), chlorination/dechlorination, aerated sludge holding tank, and sludge drying beds.

During the inspection, the following observations were noted:

- The color of the mixed liquor in the aeration tank appeared to be dark in color, and there was quite a bit of dark foam. As Mr. Howe has stated in the past, the darker color is normal for this plant. But, this office feels that solids should be wasted more often from the plant. Especially since the average daily flow for the past year was only 13,000 gpd (in a 130,000 gpd plant), the solids should not be kept so concentrated.
- 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. It's also understood that there has been a problem with the clarifier freezing up because of the low amount of flow into the plant. So, Mr. Howe has hooked up a pump and sprays warm wastewater on the top of the ice. This thaws the ice, but stirs up some of the solids.

- 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. But, they have not been working as well as they should.
- 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.
- 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.
- It's understood that post aeration was installed in March 2009.
- The blower building contained the required hardbound logbook, detailing the daily operations at the plant. It's understood that the roof of the blower building has been partially repaired.
- It's understood the composite sampler takes a sample every hour. But, the composite sampler is required to be flow proportioned, rather than time proportioned. Please make the needed sampler modifications as soon as possible.

Upon review of the electronic Discharge Monitoring Reports (eDMR's) submitted for the plant from February 1, 2009 through February 1, 2010, the following effluent violations were noted:

Permit No	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PH00003*FD	001	Total Suspended Solids	30D Conc	12	12.625	2/1/2009
3PH00003*FD	001	Total Suspended Solids	7D Conc	18	20.	2/8/2009
3PH00003*FD	001	Fecal Coliform	30D Conc	1000	1006.21	8/1/2009
3PH00003*FD	001	Total Suspended Solids	30D Conc	12	14.375	10/1/2009
3PH00003*FD	001	Nitrogen, Ammonia (NH3)	30D Conc	1.5	4.755	10/1/2009
3PH00003*FD	001	Nitrogen, Ammonia (NH3)	7D Conc	2.3	8.7	10/1/2009
3PH00003*FD	001	Total Suspended Solids	7D Conc	18	25.5	10/15/2009
3PH00003*FD	001	Total Suspended Solids	30D Conc	12	16.375	1/1/2010
3PH00003*FD	001	Total Suspended Solids	7D Conc	18	30.	1/8/2010
3PH00003*FD	001	Total Suspended Solids	7D Conc	18	22.	1/15/2010

Mr. Randy Kertesz  
Richfield Hills WWTP  
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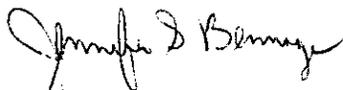
Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111.

Furthermore, 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. A compliance schedule will be placed in your renewal NPDES permit, giving you approximately 12 months to submit detail engineering plans for the sand filter and an additional 6 months to complete construction of a modified/new filter.

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, although the effluent violations have lessened than in past years, this office is concerned with the plant's appearance. Hopefully more frequent wasting of solids and new sand filters will be beneficial. The Public Notice of the draft NPDES permit will be published. Please read the draft permit carefully. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage  
Environmental Engineer  
Division of Surface Water

cc: Steve Howe, AKE Laboratory, Inc.  
Greg Dewhurst, PUCO  
Jim Wing, PUCO

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