



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 24, 2011

RE: Summit County
Upper Tuscarawas WWTP #36
Ohio EPA Permit #3PK00013
Compliance Evaluation/Pre-Permit Inspection

Mr. David E. Marquard
Summit County, Environmental Services
2525 State Road
Cuyahoga Falls, OH 44223

Dear Mr. Marquard:

On November 22, 2010, a Compliance Evaluation Inspection/Pre-Permit Inspection was conducted at the Summit County Upper Tuscarawas WWTP #36. Present during the inspection were Dave Dysle and Allison Giancola of the Division of Solid and Infectious Waste Management (DSIWM) and myself from the Division of Surface Water. Also present were Robert Hollis, Deputy Director of Operations, and Sabrina Woodson of Summit County D.O.E.S.

The wastewater treatment plant's NPDES permit is based on an average daily design flow of 4.0 MGD. According to our files, the plant consists of bar screens/comminutor, grit removal, ferric chlorine addition, primary clarifiers, rotating biological contactors (RBCs), secondary clarifiers, chemical clarifiers, tertiary sand filters, post aeration and ultraviolet disinfection. Solid stream processes include aerobic digesters, sludge holding, dewatering using a belt filter press and disposal of stabilized sludge at the PPG Lime Lakes Reclamation Area.

During the inspection, one of two primary clarifiers was off-line, a couple of the RBCs were down for maintenance, and both secondary clarifiers were off-line. Both chemical clarifiers were on-line and had some algae growth on the weirs. It's understood the rapid sand filters are at the end of their life; a consulting firm is working on the design for new filters. New covers had been installed over the UV unit to keep out sunlight. The effluent appeared clear of any visible solids.

The sludge storage pad was empty. It's understood that PPG Lime Lakes Reclamation Area can be used for sludge disposal for another 7-10 years. It's also understood that the on-site sludge storage basin is not currently being utilized.

Upon review of the Discharge Monitoring Reports (DMRs) from March 1, 2009 through March 1, 2011, the following numeric effluent violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	7D Conc	2000	2307.59	7/15/2009
001	00530	Total Suspended Solids	30D Conc	12	12.1666	9/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.5	2.85	9/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	2.25	3.23333	9/8/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	2.25	3.46667	9/15/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	2.25	2.7	9/22/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	22.7	26.6076	9/1/2009

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.275	9/1/2009
001	61942	pH, Minimum	1D Conc	6.5	6.43	9/2/2009
001	61942	pH, Minimum	1D Conc	6.5	6.35	9/3/2009
001	61942	pH, Minimum	1D Conc	6.5	6.35	9/4/2009
001	61942	pH, Minimum	1D Conc	6.5	6.42	9/5/2009
001	61942	pH, Minimum	1D Conc	6.5	6.46	9/6/2009
001	61942	pH, Minimum	1D Conc	6.5	6.4	9/7/2009
001	61942	pH, Minimum	1D Conc	6.5	6.35	9/8/2009
001	61942	pH, Minimum	1D Conc	6.5	6.35	9/9/2009
001	39100	Bis(2-ethylhexyl) Phth	30D Conc	17	40.	2/1/2010
001	39100	Bis(2-ethylhexyl) Phth	30D Qty	0.26	.39061	2/1/2010
001	31616	Fecal Coliform	30D Conc	1000	1443.68	8/1/2010
001	31616	Fecal Coliform	7D Conc	2000	3537.82	8/22/2010
001	31616	Fecal Coliform	7D Conc	2000	7432.53	9/1/2010

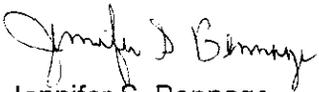
Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111.

While conducting the pre-permit inspection of the wastewater treatment plant, this writer also inspected the temporary sludge storage basin with DSIWM. Mr. Dysle sent a Notice of Violation letter to the County on December 23, 2010, which summarized the inspection findings and cited violations. Mr. Dysle indicates that no recent activity has occurred at the sludge storage area, and that Mr. Hollis stated that the area has not been used. The NOV indicates that Summit County remains in violation of Solid Waste rules for maintaining an unpermitted, unlicensed solid waste disposal facility and for open dumping.

The Public Notice of the draft renewal NPDES permit will be published in the local newspaper. Please read the permit carefully and submit any written comments to this office.

In conclusion, the wastewater treatment plant appeared to be in good operation and maintenance condition. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water

JSB/mt

cc: Mr. Robert Hollis, Summit County D.O.E.S.

ec: Mr. Dave Dysle, Ohio EPA, NEDO, DSIWM