



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

November 13, 2008

RE: CHAGRIN VALLEY COUNTRY CLUB  
VILLAGE OF MORELAND HILLS  
CUYAHOGA COUNTY  
NPDES PERMIT NO. 3PR00059\*AD

Mr. Jack Goldberg, General Manager  
Chagrin Valley Country Club  
4700 S.O.M. Center Road  
Chagrin Falls, OH 44022

Dear Mr. Goldberg:

On November 5, 2008, this office met with you and Mr. Joe Volk to conduct an inspection of the wastewater treatment plant (WWTP) serving your facility. The purpose of the inspection was to determine compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

At the time of the inspection, it was evident that the WWTP is in need of maintenance. An accumulation of wet solids was noted in the area around the aeration tank and on top of the grating. An accumulation of solids was also evident behind the baffle wall in the clarifier. The portion of grating over the aeration tank has deteriorated to such an extent that it provides no degree of safety. A section of the fence surrounding the WWTP was missing allowing unauthorized access.

The solids must be removed from the WWTP and hauled off site for proper disposal. The deteriorated grating must be replaced and the fence must be repaired.

Review of the monthly discharge monitoring reports (DMR) received by the Ohio EPA for the period June 2008 through October 2008, indicates the following effluent violations have occurred:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	.23	6/2/2008
001	50060	Chlorine, Total Residual	1D Conc	0.019	.1	6/16/2008
001	50060	Chlorine, Total Residual	1D Conc	0.019	.12	6/30/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	4.4	6/16/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	1.4	6/23/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	4.1	6/30/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	1.4	7/7/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	1.7	7/14/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	1.5	7/21/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	1.4	8/4/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	4.8	8/11/2008

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	5.0	4.8	8/18/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	4.2	8/25/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	4.7	9/2/2008
001	00300	Dissolved Oxygen	1D Conc	5.0	3.4	9/22/2008

Correspondence from your contract operator indicates that dechlorination and post aeration facilities were to be installed. Neither dechlorination nor post aeration was evident at the time of this inspection. Appropriate measures must be implemented to prevent recurring effluent violations.

A filled effluent sample bottle was observed on the ground by the chlorine contact tank. Since the sample has not been properly preserved and has broken the chain of custody procedures it cannot be considered for compliance monitoring purposes.

Chain of custody records indicate samples collected for transport to a commercial laboratory include, but not limited to, dissolved oxygen, total chlorine residual and pH. Test procedures must conform to regulation 40 CFR 136 which requires all three parameters to be analyzed within 15 minutes of collection. These parameters are analyzed in the field at the time of collection. Samples which exceed the required holding time are invalid and the values reported on the monthly discharge monitoring reports (DRM) cannot be considered in compliance with the effluent limitations. Proper sampling and analytical procedures must be implemented immediately.

Our letters of December 18, 2006 and January 12, 2007, required the confirmation of the elimination of the discharge of swimming pool filter backwash waters into waters of the state. A response letter from your contract operator states that the discharge of the backwash water will be investigated and eliminated. We have not received written confirmation stating the discharge has been eliminated.

The operator certification rule, Ohio Administrative Code (OAC) 3745-7 has changed effective December 21, 2006. The rule now requires the owner and the operator of record to maintain operation and maintenance records. These records shall be accessible onsite for twenty-four hour inspection. A copy of this section of the rule (OAC 3745-07-09) was provided to you during the inspection.

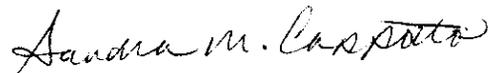
Within 15 days of the date of this letter provide this office with written notification as to the actions to be taken to correct the deficiencies cited above. Your response must include dates for completion of the actions presented in your response.

Please be advised, failure to comply with the terms and conditions of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code chapter 6111.

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If you should have any questions please contact this office at (330) 963-1124.

Sincerely,

A handwritten signature in cursive script that reads "Sandra M. Cappotto".

Sandra M. Cappotto  
Environmental Scientist  
Division of Surface Water

SMC/mlh

pc: Joe Volk, Director of Golf Facilities, Chagrin Valley Country Club  
Steve Howe, AKE Laboratory, Inc.