



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

November 5, 2008

RE: CUYAHOGA COUNTY
OLMSTED TOWNSHIP
COLUMBIA PARK
(NPDES NO. 3PV00013)

CERTIFIED MAIL

Ms. Brenda Parker
Columbia Park
7100 Columbia Road
Olmsted Twp., OH 44138

Dear Ms. Parker:

On October 7, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the Columbia Park wastewater treatment plant (WWTP), 7100 Columbia Road. The purpose of the inspection was to evaluate the facility's compliance with NPDES Permit effluent limits, as well as evaluate the treatment plant processes and effluent discharge quality. Present during the inspection was Mr. Joe Hutnyak, WWTP operator representing Columbia Park, and this writer.

At the time of the inspection, the general operation and maintenance of the plant could be rated as marginal. The following observations were made:

- 1) The Rotostrainer at the head of the WWTP has had the bearings replaced since the last inspection.
- 2) The Can-Tex treatment unit and Aero-Mod aeration tanks were all in operation. Contents of the tanks were medium brown in color. Suspended solids in the tanks appeared to be at a normal operating level.
- 3) The underground air lines leading to the above-ground aeration tanks have been replaced with new PVC lines along the side of the aeration tank.
- 4) Both of the rapid sand filters were in operation.
- 5) Solids from the rapid sand filter backwash were being wasted onto 2 of the slow surface sand filters.
- 6) Sludge wasting lines from the sludge thickening tank are discharged to the slow surface sand filters.
- 7) Post aeration has been added to the chlorine contact tank, allowing the effluent to be aerated prior to discharge.
- 8) Effluent chlorination is accomplished by tablet and liquid chlorine. Dechlorination is performed by use of dechlorination tablets.

Items discussed with Mr. Hutnyak during the October 7th inspection include the following:

- 1) The scrapers in the Can-Tex unit were repaired / replaced in September 2008.
- 2) Mr. Hutnyak has been experiencing problems with a growth of 'red worms' in the sludge wasting line, leading from the sludge thickener to the slow surface sand filter. The worms plug the line, and when the line is finally cleared of the mass, they deposit on the sand filter. Ohio EPA will check on possible O&M procedures which could eliminate or minimize the problem.
- 3) Dried solids from the filter beds, and screenings from the Rotostrainer, are deposited in a dumpster, and hauled by BFI to the landfill.

- 4) Paul Header, of Header Maintenance, visits the WWTP approximately twice per week, and sometimes once on the weekends.
- 5) Consideration is being given to purchase and installation of a standby generator for the WWTP.
- 6) Mr. Hutnyak was asked if he had a Class I Wastewater Operator's License, to which he indicated he did not. Since Mr. Hutnyak is the day-to-day operator at the WWTP, it would be very beneficial to both him and Columbia Park, if he were to take the necessary coursework and exam to become a licensed wastewater operator.
- 7) Columbia Park needs to determine the cause of the numerous suspended solids violations, and correct the situation as soon as possible.
- 8) Construction of a new portion of the park was observed by this writer. Mr. Hutnyak was asked about the construction, and it was indicated that approximately 30 new units were planned. Review of the file for Columbia Park revealed the expansion was considered favorable by this office in a February 16, 2006 Ohio EPA letter, provided detail plans were submitted and a permit-to-install was obtained for the sewers. No such submittal was observed in the file for Columbia Park.
- 9) This office is requesting an itemized list of all parameters sampled and tested for by Columbia Park in order to meet their NPDES Permit final effluent limit requirements. The information should indicate the parameter; who collects the sample; where the parameter is analyzed; and what analytical method is used for the analysis. It should be noted that only specific collection methods and test procedures are approved in the analysis of each parameter.

According to our files, the last Compliance Evaluation Inspection (CEI) conducted at the Columbia Park WWTP was on September 27, 2007. A review of the electronic Discharge Monitoring Reports (eDMR) submitted for the WWTP since our last inspection found the following final effluent limit numeric violations (October 1, 2007 through September 1, 2008):

**Columbia Park WWTP
 NPDES Permit 3PV00013
 Numeric Effluent Violations
 (Oct. 1, 2007 through Sept. 1, 2008)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2007	Dissolved Oxygen	1D Conc	5.0	3.5	10/3/2007
October 2007	Dissolved Oxygen	1D Conc	5.0	4.3	10/4/2007
October 2007	Dissolved Oxygen	1D Conc	5.0	4.5	10/5/2007
October 2007	Dissolved Oxygen	1D Conc	5.0	4.2	10/8/2007
October 2007	Dissolved Oxygen	1D Conc	5.0	4.6	10/9/2007
October 2007	Total Suspended Solids	1D Conc	18	31.4	10/24/2007
October 2007	Dissolved Oxygen	1D Conc	5.0	4.4	10/29/2007
November 2007	Total Suspended Solids	30D Conc	12	14.9777	11/1/2007
November 2007	Total Suspended Solids	1D Conc	18	18.8	11/4/2007
November 2007	Total Suspended Solids	1D Conc	18	21.4	11/11/2007
November 2007	Total Suspended Solids	1D Conc	18	24.6	11/16/2007
November 2007	Total Suspended Solids	1D Qty	17.0	26.6297	11/16/2007
November 2007	Total Suspended Solids	1D Conc	18	20.2	11/22/2007

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2007	Total Suspended Solids	1D Qty	17.0	25.4601	11/22/2007
November 2007	CBOD 5 day	1D Qty	14.2	15.1248	11/22/2007
December 2007	Total Suspended Solids	30D Conc	12	20.9	12/1/2007
December 2007	Total Suspended Solids	30D Qty	11.4	23.0930	12/1/2007
December 2007	Total Suspended Solids	1D Conc	18	26.8	12/4/2007
December 2007	Total Suspended Solids	1D Conc	18	18.8	12/12/2007
December 2007	Total Suspended Solids	1D Qty	17.0	27.5381	12/12/2007
December 2007	Total Suspended Solids	1D Conc	18	22.8	12/15/2007
December 2007	Total Suspended Solids	1D Qty	17.0	50.3117	12/15/2007
December 2007	CBOD 5 day	1D Qty	14.2	14.3432	12/15/2007
December 2007	Total Suspended Solids	1D Conc	18	44.8	12/19/2007
December 2007	Total Suspended Solids	1D Qty	17.0	42.2224	12/19/2007
December 2007	Total Suspended Solids	1D Conc	18	22.6	12/23/2007
December 2007	Total Suspended Solids	1D Qty	17.0	33.7031	12/23/2007
January 2008	Total Suspended Solids	1D Conc	18	31.4	1/15/2008
January 2008	Total Suspended Solids	1D Qty	17.0	20.5608	1/15/2008
January 2008	Total Suspended Solids	1D Conc	18	19.	1/19/2008
February 2008	Total Suspended Solids	30D Conc	12	14.7666	2/1/2008
February 2008	Total Suspended Solids	1D Conc	18	22.2	2/9/2008
February 2008	Total Suspended Solids	1D Qty	17.0	18.7380	2/9/2008
February 2008	Total Suspended Solids	1D Conc	18	37.8	2/11/2008
February 2008	Total Suspended Solids	1D Qty	17.0	18.0272	2/11/2008
February 2008	Total Suspended Solids	1D Qty	17.0	18.2997	2/15/2008
February 2008	CBOD 5 day	1D Conc	15	15.2	2/23/2008
March 2008	Total Suspended Solids	30D Conc	12	25.6888	3/1/2008
March 2008	Total Suspended Solids	30D Qty	11.4	30.3129	3/1/2008
March 2008	Total Suspended Solids	1D Conc	18	49.9	3/4/2008
March 2008	Total Suspended Solids	1D Qty	17.0	78.1928	3/4/2008
March 2008	Total Suspended Solids	1D Conc	18	38.8	3/14/2008
March 2008	Total Suspended Solids	1D Qty	17.0	69.6106	3/14/2008
March 2008	Total Suspended Solids	1D Conc	18	27.6	3/17/2008
March 2008	Total Suspended Solids	1D Qty	17.0	36.1452	3/17/2008
March 2008	CBOD 5 day	1D Qty	14.2	17.1558	3/17/2008
March 2008	Total Suspended Solids	1D Conc	18	33.6	3/21/2008
March 2008	Total Suspended Solids	1D Qty	17.0	26.3254	3/21/2008
March 2008	Total Suspended Solids	1D Conc	18	26.2	3/24/2008
March 2008	Total Suspended Solids	1D Qty	17.0	27.8659	3/24/2008
March 2008	Total Suspended Solids	1D Conc	18	40.2	3/28/2008
March 2008	Total Suspended Solids	1D Qty	17.0	24.3451	3/28/2008
April 2008	Total Suspended Solids	1D Conc	18	19.8	4/1/2008
April 2008	Total Suspended Solids	30D Conc	12	17.8	4/1/2008
April 2008	Total Suspended Solids	30D Qty	11.4	14.2890	4/1/2008
April 2008	CBOD 5 day	30D Conc	10	10.1888	4/1/2008
April 2008	Total Suspended Solids	1D Conc	18	19.2	4/4/2008
April 2008	Total Suspended Solids	1D Qty	17.0	25.4352	4/4/2008
April 2008	CBOD 5 day	1D Qty	14.2	14.7047	4/4/2008

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2008	Total Suspended Solids	1D Conc	18	40.	4/11/2008
April 2008	Total Suspended Solids	1D Qty	17.0	42.6948	4/11/2008
April 2008	CBOD 5 day	1D Qty	14.2	15.1566	4/11/2008
April 2008	Total Suspended Solids	1D Conc	18	23.6	4/14/2008
May 2008	Total Suspended Solids	30D Conc	12	20.14	5/1/2008
May 2008	Total Suspended Solids	30D Qty	11.4	11.5481	5/1/2008
May 2008	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.3	5/1/2008
May 2008	Chlorine, Total Residu	1D Conc	0.019	.07	5/1/2008
May 2008	Total Suspended Solids	1D Conc	18	30.2	5/4/2008
May 2008	Total Suspended Solids	1D Conc	18	18.4	5/17/2008
May 2008	Total Suspended Solids	1D Qty	17.0	23.8878	5/17/2008
May 2008	Total Suspended Solids	1D Conc	18	75.	5/19/2008
May 2008	Total Suspended Solids	1D Qty	17.0	42.8651	5/19/2008
May 2008	Total Suspended Solids	1D Conc	18	22.2	5/22/2008
June 2008	Total Suspended Solids	1D Conc	18	22.6	6/1/2008
June 2008	Total Suspended Solids	30D Conc	12	35.5	6/1/2008
June 2008	Total Suspended Solids	30D Qty	11.4	25.9183	6/1/2008
June 2008	Total Suspended Solids	1D Conc	18	38.8	6/8/2008
June 2008	Total Suspended Solids	1D Conc	18	52.2	6/12/2008
June 2008	Total Suspended Solids	1D Qty	17.0	83.7726	6/12/2008
June 2008	CBOD 5 day	1D Qty	14.2	17.3322	6/12/2008
June 2008	Total Suspended Solids	1D Conc	18	48.	6/14/2008
June 2008	Total Suspended Solids	1D Conc	18	57.	6/19/2008
June 2008	Total Suspended Solids	1D Qty	17.0	21.1430	6/19/2008
June 2008	Total Suspended Solids	1D Conc	18	34.3	6/21/2008
June 2008	Total Suspended Solids	1D Qty	17.0	30.6388	6/21/2008
June 2008	Total Suspended Solids	1D Conc	18	24.4	6/26/2008
June 2008	Total Suspended Solids	1D Qty	17.0	32.7856	6/26/2008
June 2008	Total Suspended Solids	1D Conc	18	27.4	6/28/2008
June 2008	Total Suspended Solids	1D Qty	17.0	30.6978	6/28/2008
July 2008	Total Suspended Solids	30D Conc	12	26.275	7/1/2008
July 2008	Total Suspended Solids	30D Qty	11.4	14.8123	7/1/2008
July 2008	Total Suspended Solids	1D Conc	18	22.6	7/5/2008
July 2008	Total Suspended Solids	1D Conc	18	33.	7/8/2008
July 2008	Total Suspended Solids	1D Qty	17.0	44.4661	7/8/2008
July 2008	Total Suspended Solids	1D Conc	18	44.4	7/19/2008
July 2008	Total Suspended Solids	1D Qty	17.0	19.6623	7/19/2008
July 2008	Total Suspended Solids	1D Conc	18	29.6	7/23/2008
July 2008	Total Suspended Solids	1D Conc	18	45.2	7/26/2008
July 2008	Total Suspended Solids	1D Qty	17.0	17.2792	7/26/2008
July 2008	Dissolved Oxygen	1D Conc	5.0	4.3	7/29/2008
July 2008	Dissolved Oxygen	1D Conc	5.0	3.5	7/30/2008
July 2008	Dissolved Oxygen	1D Conc	5.0	3.	7/31/2008
August 2008	Total Suspended Solids	30D Conc	12	12.8666	8/1/2008
August 2008	Dissolved Oxygen	1D Conc	5.0	2.1	8/1/2008
August 2008	Dissolved Oxygen	1D Conc	5.0	4.8	8/2/2008

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2008	Total Suspended Solids	1D Conc	18	40.2	8/5/2008
August 2008	Dissolved Oxygen	1D Conc	5.0	4.3	8/9/2008
August 2008	Dissolved Oxygen	1D Conc	5.0	3.3	8/10/2008
August 2008	Dissolved Oxygen	1D Conc	5.0	2.7	8/11/2008
August 2008	Total Suspended Solids	1D Conc	18	21.	8/16/2008

Total numeric effluent violations:	Dissolved Oxygen.....	14
	Total Suspended Solids.....	86
	Ammonia Nitrogen.....	1
	CBOD ₅	8
	Chlorine Residual.....	1
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	Total Violations.....	110

The eDMR data reveals an excessive abundance of Total Suspended Solids (TSS) violations over the past year. The cause of the TSS violations needs to be determined as soon as possible, since the WWTP does include rapid sand filters in its treatment scheme, and the rapid sand filters are designed to capture any suspended solids which make it through the treatment process.

The Columbia Park WWTP is in significant noncompliance with its NPDES Permit to discharge. This noncompliance has caused the WWTP to be placed on a tracking list for entities which may have escalated enforcement actions taken against them if the violations are not corrected in a timely manner. Corrective actions need to be taken to bring the WWTP back into compliance with its permit as soon as possible.

Please contact this office in writing, within 10 days of the receipt of this letter, indicating what corrective actions will be taken to bring the WWTP back into compliance. If necessary, a meeting can be held between the Park administrators and Ohio EPA to discuss a resolution to this matter.

If you have any questions or comments about this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
 Environmental Engineer
 Division of Surface Water

CEA/mt

File: SP/CuyahogaCounty/OlmstedTwp/Columbia MHP

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