



Environmental  
Protection Agency

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

April 6, 2011

RE: CUYAHOGA COUNTY  
CITY OF PEPPER PIKE  
URSULINE COLLEGE  
NPDES PERMIT NO. OH0044784  
OHIO EPA PERMIT NO. 3PT00025

Ms. June Gracyk  
VP of Facilities and Operations  
Ursuline College  
2550 Lander Road  
Pepper Pike, OH 44124

Dear Ms. Gracyk:

On February 24, 2011, an inspection of the wastewater treatment plant (WWTP) serving Ursuline College was conducted by the undersigned. The facility was represented by Messrs. Jim Kryzwicki, Maintenance Supervisor, and Steve Howe of AKE Laboratory, Inc. The purpose of the inspection was to obtain and review information in anticipation of renewal of the facility's National Pollutant Discharge Elimination System (NPDES) discharge permit. During the course of the inspection, evaluations were conducted of the treatment processes, effluent discharge quality, laboratory, and biosolids management.

### **Facility Description**

The current NPDES permit authorizes an average daily discharge of 0.05 MGD to the unnamed tributary of Pepper-Luce Creek, and subsequently, the Chagrin River. The WWTP consists of a comminutor, dual extended aeration treatment units (one 80,000 gpd and one 30,000 gpd) capacity with final clarifiers, sludge holding, rotating fine screen filter, and UV disinfection.

### **Inspection Findings/Compliance Status**

At the time of the inspection the following items were noted and discussed with the gentlemen:

1. We understand that the WWTP and collection system is maintained under a service agreement with AKE Laboratory. The agreement also includes laboratory services and submission of the monthly Discharge Monitoring Reports (DMRs). A summary of the effluent discharge data submitted during past the 5 years is attached.

Ms. June Gracyk, VP of Operations  
 Ursuline College  
 April 6, 2011  
 Page 2

2. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. A visual observation of the plant effluent revealed no signs of floating debris, oil & grease, or foam in the discharge.
3. Appropriate guardrails and/or grating must be installed around all open tanks.

A review of the DMRs for the period, January 2009 – February 2011, indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Report Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2009	001	CBOD 5 day	1D Conc	15	40.	8/25/2009
August 2009	001	CBOD 5 day	1D Qty	2.8	5.299	8/25/2009
August 2009	001	CBOD 5 day	30D Conc	10	21.05	8/1/2009
August 2009	001	CBOD 5 day	30D Qty	1.9	2.68527	8/1/2009
December 2009	001	Copper, Total Recovera	30D Conc	19.0	24.	12/1/2009
June 2009	001	Dissolved Oxygen	1D Conc	6.0	4.1	6/30/2009
August 2009	001	Dissolved Oxygen	1D Conc	6.0	.9	8/25/2009
September 2009	001	Dissolved Oxygen	1D Conc	6.0	5.5	9/1/2009
September 2009	001	Dissolved Oxygen	1D Conc	6.0	4.7	9/8/2009
September 2009	001	Dissolved Oxygen	1D Conc	6.0	5.7	9/15/2009
September 2009	001	Dissolved Oxygen	1D Conc	6.0	4.5	9/22/2009
April 2010	001	Dissolved Oxygen	1D Conc	6.0	5.5	4/27/2010
May 2010	001	Dissolved Oxygen	1D Conc	6.0	5.	5/25/2010
June 2010	001	Dissolved Oxygen	1D Conc	6.0	4.8	6/1/2010
June 2010	001	Dissolved Oxygen	1D Conc	6.0	5.3	6/15/2010
October 2009	001	Fecal Coliform	1D Conc	2000	2120.	10/27/2009
October 2010	001	Fecal Coliform	1D Conc	2000	2730.	10/26/2010
October 2009	001	Fecal Coliform	30D Conc	1000	2120.	10/1/2009
August 2010	001	Fecal Coliform	30D Conc	1000	1320.	8/1/2010
September 2010	001	Fecal Coliform	30D Conc	1000	1960.	9/1/2010
October 2010	001	Fecal Coliform	30D Conc	1000	2730.	10/1/2010
May 2010	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.445	5/1/2010
May 2010	001	Total Suspended Solids	1D Conc	18	31.	5/25/2010
August 2009	001	Total Suspended Solids	30D Conc	12	15.5	8/1/2009
May 2010	001	Total Suspended Solids	30D Conc	12	14.25	5/1/2010

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Ms. June Gracyk, VP of Operations  
Ursuline College  
April 6, 2011  
Page 3

### **Anticipated NPDES Permit Changes**

Based on recent rule revisions and/or policy guidance, the following changes will be incorporated into the renewal permit:

- The facility will remain as a Class I treatment works in accordance with Ohio Administrative Code (OAC) 3745-7.
- As of March 15, 2010, the current Fecal Coliform water quality standard was replaced by an *E. coli* standard. Based on the new Class B Primary Contact Recreation standard, the projected *E. coli* effluent limitations for the facility will be 161/100 ml (30-day average) and 362/100 ml (7-day average). The NPDES permit will include a "Schedule of Compliance" to allow the facility until May 2012 to achieve compliance with the new requirement. **Please advise this office if you believe that such a schedule is not necessary.**
- Effluent monitoring for Phosphorus, Total Dissolved Solids (TDS), and Nitrate-Nitrite (as N) will be added to the permit. Monitoring for Color, Severity and Odor, Severity will be discontinued.

### **Summary/Conclusion**

Based on the inspection findings and the facility's improved compliance record since October 2010, this office anticipates drafting and public-noticing the renewal permit for public review and comment. Comments received during the public-notice period will be considered by Ohio EPA prior to issuance of a final permit.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

cc: Steve Howe, AKE Laboratory, Inc.

File: SemiPublic/Cuyahoga County/Pepper Pike/Ursuline College

Ursuline College (3PT00025) Effluent Data Summary (4/2006 – 2/2011)						
Parameter	Season	Units	# Obs.	Percentiles		Data Range
				50 <sup>th</sup>	95 <sup>th</sup>	
<b>Outfall 001</b>						
Water Temperature	Annual	C	1242	16	25	2-30
Color, Severity	Annual	Units	1243	0	1	0-3
Dissolved Oxygen	Summer	mg/l	129	7.2	8.2	0.9-8.7
Dissolved Oxygen	Winter	mg/l	124	7.9	10.2	1.5-11.1
pH	Annual	S.U.	253	7.2	7.5	6.5-7.8
Total Suspended Solids	Annual	mg/l	253	4	15	1-35
Nitrogen, Ammonia (NH3)	Summer	mg/l	64	0.26	2.14	0.1-3
Nitrogen, Ammonia (NH3)	Winter	mg/l	62	0.29	1.51	0.08-9.15
Zinc, Total Recoverable	Annual	ug/l	10	37	105	0-130
Copper, Total Recoverable	Annual	ug/l	10	14	34.5	0-43
Odor, Severity	Annual	Units	1243	0	0	0-2
Turbidity, Severity	Annual	Units	1243	0	1	0-3
Fecal Coliform	Annual	#/100 ml	30	345	2050	20-2730
Flow Rate	Summer	MGD	819	0.025	0.0471	0.0002-0.095
Flow Rate	Winter	MGD	790	0.026	0.05	0.00006-0.116
Flow Rate	Annual	MGD	1609	0.025	0.049	0.00006-0.116
CBOD 5 day	Summer	mg/l	129	1.4	3.06	1-40
CBOD 5 day	Winter	mg/l	124	2.3	5.69	1-12.8