



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 18, 2009

RE: PEPPER PIKE CLUB COMPANY
CUYAHOGA COUNTY
CITY OF PEPPER PIKE
NPDES PERMIT 3PR00215*BD

Mr. William M. Heffernan, General Manager
Pepper Pike Club
2800 S.O.M. Center Road
Pepper Pike, OH 44124

Dear Mr. Heffernan:

On November 17, 2008, this office met with you and Mr. Steve Howe, Ake Environmental & Construction Services, Inc., to conduct an inspection of the wastewater treatment plant (WWTP) serving your facility. The purpose of the inspection was to obtain and review information in anticipation of renewal of the National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit for this facility will expire on January 31, 2010. Receipt of the renewal application by the Ohio EPA authorizes the permittee to discharge beyond the expiration date.

The WWTP serves a golf style country club. The operator of record in responsible charge of the WWTP is provided under contract for the technical services. Treatment consists of a trash trap, extended aeration package plant and clarifier, a dosing chamber, surface sand filter divided into two beds and chlorination/dechlorination facilities. Solids handling facilities consist of an aerated sludge holding tank and sludge drying beds.

At the time of this inspection all treatment components were in service, with the exception of chlorination/dechlorination due to winter monitoring months. The WWTP appeared to be functioning properly. Extended aeration consists of 2-12,000 gallon tanks. All flow is tributary to one 12,000 gallon tank. Flow to the plant was minimal; the water level in the aeration tank was a couple of inches below the effluent trough.

Sampling of the effluent is conducted at the chlorine contact tank. The actual location of the discharge pipe is not known. As discussed the discharge pipe will be televised to determine its location and condition. The results are to be submitted to this office no later than December 31, 2009.

A contract laboratory analyzes all parameters required by the NPDES permit except for flow, color, odor and turbidity which are the responsibility of the permittee. Records to be provided by your contract laboratory must include a quality assurance report that

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contains information such as: analytical methods, detection levels, analytical results, parameters analyzed and laboratory analyst. This information must be retained in accordance with the requirements of your NPDES permit.

The log sheets for flow, color, odor and turbidity must include the time of day each requirement is recorded. As discussed, flow determination must be based upon a 24 hour estimate; thus, the time elapse meters must be read at the same time each day.

It was indicated that the flow volume is based upon the run time of two dosing pumps each rated at 60 gpm. A review of our records indicates that the dosing pumps installed under a permit-to-install (PTI application number 02-4028) effective September 26, 1988, were each rated at 120 gpm. Please confirm the capacity of the two pumps in writing to this office no later than December 11, 2009.

Discharge monitoring reports (DMR), received by Ohio EPA for the period November 2008 through October 2009, were reviewed for compliance with the effluent limitations and monitoring requirements of the NPDES permit. The specific violations are cited below:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	30D Qty	0.9	1.66919	3/1/2009
001	80082	CBOD 5 day	7D Qty	1.4	1.66919	3/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.2	1/21/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	1.9	6/17/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	.1	7/15/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	2.6	7/22/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	7/29/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	8/19/2009
001	00400	pH	1D Conc	9.0	9.1	8/5/2009
001	00530	Total Suspended Solids	30D Qty	1.1	1.90764	3/1/2009
001	00530	Total Suspended Solids	7D Qty	1.6	1.90764	3/1/2009

Exceedance of the dissolved oxygen (DO) limitation continues to be a recurring violation. It is our understanding that the DO meter may only be calibrated on a monthly basis. For quality assurance purposes the meter must be calibrated prior to use for that day. Appropriate records documenting the calibration of the meter must be maintained by the contract laboratory. An evaluation of DO procedures must be conducted and confirmed in writing to this office no later than December 11, 2009.

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The operator certification rules, Ohio Administrative Code (OAC) 3745-7 effective December 21, 2006, requires the owner and the operator of record to maintain operation and maintenance records. A bound log book is maintained in a mailbox at the WWTP. The information contained therein includes, but is not limited to, the following:

- Date and times of arrival and departure of the operator of record;
- Narrative of the operation and maintenance activities, including repairs, performed during the visit; and
- Identification of the person making the entry.

A single family residence exists on the same deeded property as the country club and is served by its own home sewage treatment system. This system is currently authorized under permit number 2497 Household Sewage System Management Permit with the Cuyahoga County Board of Health.

All information required above must be submitted to this office as requested. If you should have any questions please contact this office at (330) 963-1124.

Sincerely,



Sandra M. Cappotto
Environmental Scientist
Division of Surface Water

SMC/mt

pc: Steve Howe, Ake Environmental & Construction Services, Inc.
Cuyahoga County Board of Health