



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

October 23, 2007

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:

This office has reviewed the monthly operating reports covering the months of February 2005 through September 2007 for the above referenced facility. Our review indicates noncompliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit. The specific instances of noncompliance are as follows:

Reporting Code	Parameter	Units	Date	A Code
50050	Flow Rate	MGD	2/27/2006	AH-no reading taken
50050	Flow Rate	MGD	2/28/2006	AH-no reading taken
50050	Flow Rate	MGD	6/27/2006	AH-no reading taken
50050	Flow Rate	MGD	6/28/2006	AH-meter out of service
50050	Flow Rate	MGD	6/29/2006	AH-meter out of service
50050	Flow Rate	MGD	6/30/2006	AH-meter out of service
50050	Flow Rate	MGD	7/1/2006	AH-meter out of service
50050	Flow Rate	MGD	7/2/2006	AH-meter out of service
50050	Flow Rate	MGD	7/3/2006	AH-meter out of service
50050	Flow Rate	MGD	7/4/2006	AH-meter out of service
50050	Flow Rate	MGD	7/5/2006	AH-meter out of service
50050	Flow Rate	MGD	7/6/2006	AH-meter out of service
50050	Flow Rate	MGD	7/7/2006	AH-meter out of service
50050	Flow Rate	MGD	7/8/2006	AH-meter out of service
50050	Flow Rate	MGD	7/9/2006	AH-meter out of service
50050	Flow Rate	MGD	7/10/2006	AH-meter out of service
50050	Flow Rate	MGD	7/31/2006	AH-no reading taken
50050	Flow Rate	MGD	8/31/2006	AH-no reading taken
50050	Flow Rate	MGD	9/30/2006	AH-no reading taken
50050	Flow Rate	MGD	10/31/2006	AH-no reading taken
50050	Flow Rate	MGD	11/30/2006	AH-no reading taken
50050	Flow Rate	MGD	12/31/2006	AH-no reading taken
50050	Flow Rate	MGD	1/1/2007	AH-no reading taken
50050	Flow Rate	MGD	1/2/2007	AH-no reading taken

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Reporting Code	Parameter	Units	Date	A Code
50050	Flow Rate	MGD	1/31/2007	AH-no reading taken
50050	Flow Rate	MGD	2/27/2007	AH-no reading taken
50050	Flow Rate	MGD	2/28/2007	AH-no reading taken
50050	Flow Rate	MGD	5/18/2007	AH-no flow
50050	Flow Rate	MGD	5/31/2007	AH-no reading taken
50050	Flow Rate	MGD	6/11/2007	AH-no flow
50050	Flow Rate	MGD	6/15/2007	AH-no flow
50050	Flow Rate	MGD	6/20/2007	AH-no flow
50050	Flow Rate	MGD	6/21/2007	AH-no flow
50050	Flow Rate	MGD	6/26/2007	AH-no flow
50050	Flow Rate	MGD	6/27/2007	AH-no flow
50050	Flow Rate	MGD	6/30/2007	AH-no reading taken
50050	Flow Rate	MGD	7/2/2007	AH-no reading taken
50050	Flow Rate	MGD	7/31/2007	AH-no reading taken
50050	Flow Rate	MGD	8/31/2007	AH-no reading taken
50050	Flow Rate	MGD	9/30/2007	AH-no reading taken
50050	Flow Rate	MGD	4/29/2005	AN
50050	Flow Rate	MGD	4/30/2005	AN
50050	Flow Rate	MGD	6/30/2005	AN
50050	Flow Rate	MGD	9/30/2005	AN
50050	Flow Rate	MGD	12/31/2005	AN

The NPDES permit requires flow to be monitored daily. The use of an "A" code does not provide relief from this requirement. Per Part II of your NPDES permit the use of reporting code "AN" is for all parameters **except** flow that are required to be monitored daily.

It was also noted that the chlorine residual value has been reported as "0" on four occasions (10-19-05; 5-3-06; 6-14-06; 6-13-07). Please note that values of "0" should not be reported on monthly reports for analytical parameters such as chlorine. If the quantitative analysis, performed according to an approved analytical method, does not detect the substance or detects it at a level below the method detection level (MDL) then the appropriate value to report is "AA" (Below Detectable Limit). When this code is used the detection limit must be reported in the dialog box when using SWIMware.

The NPDES permit includes a Schedule of Compliance (Part I, C) for the installation of post aeration equipment. It was determined that the equipment was necessary for achieving compliance with the final effluent limitation for dissolved oxygen. Review of our records indicates, in a letter under your signature, that the installation of post aeration equipment was to be completed by November 2004. Please confirm this date.

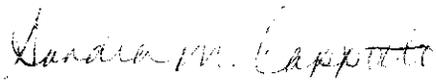
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Please be advised, failure to comply with the monitoring and reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Within ten days of the date of this letter, provide written notification to this office of the actions taken or to be taken to correct the above violations.

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