



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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

August 6, 2007

RE: CHAGRIN VALLEY HUNT CLUB  
CUYAHOGA COUNTY  
VILLAGE OF GATES MILLS  
COMPLIANCE EVALUATION INSPECTION  
NPDES PERMIT 3PR00175 (OH0122092)

Mr. James Misencik, General Manager  
Chagrin Valley Hunt Club  
P.O. Box 159  
Gates Mills, OH 44040

Dear Mr. Misencik:

On July 26, 2007, this office met with you and Messrs. Joe Hentemann, Joe Polzner, both with Chagrin Valley Hunt Club, and Jeff Ginn, AKE Laboratory, Inc., to conduct an inspection of the wastewater treatment plant (WWTP) serving the above referenced 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 December 31, 2007.

The WWTP is maintained by AKE Laboratory, Inc. The services provided by AKE Laboratory, Inc. include, but are not limited to, laboratory services and preparation of monthly operating reports (MOR).

The WWTP consists of multiple trash traps, an influent pump station, flow equalization tank, dual sequential batch reactors, rapid sand filtration, ultraviolet disinfection, and an aerated sludge holding tank. At the time of the inspection, all components of treatment were in service and the final effluent was clear with no visual impact to the receiving stream.

Review of the MOR data for May and June 2007, indicates continued noncompliance with the terms and conditions of your NPDES permit. The specific instance of noncompliance relates to reporting code violations for outfall 001. The violations are summarized in the enclosed attachment.

As stated in our Notice of Violation letters of February 2, 2006, and May 25, 2007, the NPDES permit requires flow to be monitored continuously and reported daily. The use of "AH" for weekends and holidays is not acceptable. A daily flow value must be provided.

Per Part II of your NPDES permit, the reporting code "AN" may be used for weekend and holiday reporting, if normally not staffed. Except for flow monitoring, this code applies only to those parameters that are required to be monitored daily (color, odor, turbidity). A severity unit is required for all other days.

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"AH" has been reported for other parameters that are required to be monitored either monthly (suspended solids, ammonia, fecal coliform, CBOD<sub>5</sub>) or weekly (temperature, dissolved oxygen, pH). If there is flow during the month a sample must be collected.

Please be advised, the use of "A" codes does not provide relief from the monitoring requirements of your NPDES permit and the continued use of these codes may be cause for enforcement pursuant to the Ohio Revised Code chapter 6111.

As discussed, monitoring for all parameters will now be performed at the required frequencies by either AKE Laboratory personnel or club personnel.

The NPDES permit Part III requires all reports submitted to the Director to be signed in accordance with the requirements of 40 CFR 122.22. Appropriate signatories include a responsible corporate officer, a general partner, a proprietor or a duly authorized representative of that person. A duly authorized representative may be a named individual or position. Currently, the MORs are signed by a representative of AKE Laboratory, Inc. To be duly authorized, the signed contractual agreement between AKE Laboratory, Inc. and Chagrin Valley Hunt Club must include delegation for signing these reports. In lieu of such delegation, the MORs must be signed by the appropriate representative of the club.

Other wastewater generated by the hunt club, besides sanitary, includes swimming pool filter backwash water and wash water from two horse wash stalls. These wastewaters are discharged directly to Mill Stream, a small tributary of the Chagrin River. Also noted, the waste bedding material (straw and manure) from the horse barn was discarded onto the ground, outside of the barn, surrounding a dumpster. A storm sewer drain is located at the outside corner of the horse barn in the immediate area of the discarded bedding material. During a wet weather event the bedding material will drain into this storm sewer that discharges directly to waters of the state.

Please be advised, the discharge of these wastewaters to waters of the state is an unauthorized discharge and may be subject to enforcement pursuant to the Ohio Revised Code Chapter 6111.

Within thirty days of the date of this letter provide this office with the following information:

Documentation confirming all MORs have been properly signed by a representative of the club or submit a copy of the contractual agreement duly authorizing AKE Laboratory, Inc.

Confirmation of the elimination of the direct discharge of swimming pool filter backwash water and horse wash stall wastewater by connecting to the WWTP.

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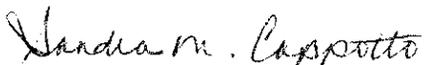
A copy of a best management practices plan for handling the horse stall waste bedding material. The plan must outline the procedures to prevent exposure and run-off of the material during wet weather events. Include training for workers/staff/members on these procedures and the name of the individual responsible for implementing the requirements of the plan.

Please be advised, the operator certification rules, Ohio Administrative Code 3745-7 have changed effective December 21, 2006. The rules now require the owner and operator of record to maintain operation and maintenance records that shall be accessible on site for twenty-four hour inspection. Please refer to this rule for the information that is required to be maintained.

A draft copy of the renewal permit will be sent under separate cover. Any comments regarding the draft permit must be submitted in writing during the public notice period.

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

Sincerely,



Sandra M. Cappotto  
Environmental Scientist  
Division of Surface Water

SMC:

enclosure

cc: Joe Hentemann, Chagrin Valley Hunt Club (w/enclosure)  
Steve Howe, AKE Laboratory, Inc. (w/enclosure)

Attachment - Reporting Code Violations

Parameter	Units	Date	A Code
Water Temperature	C	5/4/2007	AH
Water Temperature	C	5/11/2007	AH
Water Temperature	C	5/18/2007	AH
Water Temperature	C	5/25/2007	AH
Water Temperature	C	6/4/2007	AH
Water Temperature	C	6/11/2007	AH
Water Temperature	C	6/18/2007	AH
Water Temperature	C	6/25/2007	AH
Flow Rate	GPD	5/1/2007	AH
Flow Rate	GPD	5/3/2007	AH
Flow Rate	GPD	5/6/2007	AH
Flow Rate	GPD	5/12/2007	AH
Flow Rate	GPD	5/13/2007	AH
Flow Rate	GPD	5/20/2007	AH
Flow Rate	GPD	5/22/2007	AH
Flow Rate	GPD	5/28/2007	AH
Flow Rate	GPD	6/3/2007	AH
Flow Rate	GPD	6/11/2007	AH
Flow Rate	GPD	6/18/2007	AH
Flow Rate	GPD	6/25/2007	AH
Color, Severity	Units	5/1/2007	AN
Color, Severity	Units	5/2/2007	AN
Color, Severity	Units	5/3/2007	AN
Color, Severity	Units	5/4/2007	AH
Color, Severity	Units	5/5/2007	AN
Color, Severity	Units	5/6/2007	AN
Color, Severity	Units	5/7/2007	AN
Color, Severity	Units	5/8/2007	AN
Color, Severity	Units	5/9/2007	AN
Color, Severity	Units	5/10/2007	AN
Color, Severity	Units	5/11/2007	AH
Color, Severity	Units	5/12/2007	AN
Color, Severity	Units	5/13/2007	AN
Color, Severity	Units	5/14/2007	AN
Color, Severity	Units	5/15/2007	AN
Color, Severity	Units	5/16/2007	AN
Color, Severity	Units	5/17/2007	AN
Color, Severity	Units	5/18/2007	AH
Color, Severity	Units	5/19/2007	AN
Color, Severity	Units	5/20/2007	AN
Color, Severity	Units	5/21/2007	AN
Color, Severity	Units	5/22/2007	AN

Parameter	Units	Date	A Code
Color, Severity	Units	5/23/2007	AN
Color, Severity	Units	5/24/2007	AN
Color, Severity	Units	5/25/2007	AH
Color, Severity	Units	5/26/2007	AN
Color, Severity	Units	5/27/2007	AN
Color, Severity	Units	5/28/2007	AN
Color, Severity	Units	5/29/2007	AN
Color, Severity	Units	5/30/2007	AN
Color, Severity	Units	5/31/2007	AN
Color, Severity	Units	6/1/2007	AN
Color, Severity	Units	6/2/2007	AN
Color, Severity	Units	6/3/2007	AN
Color, Severity	Units	6/4/2007	AH
Color, Severity	Units	6/5/2007	AN
Color, Severity	Units	6/6/2007	AN
Color, Severity	Units	6/7/2007	AN
Color, Severity	Units	6/8/2007	AN
Color, Severity	Units	6/9/2007	AN
Color, Severity	Units	6/10/2007	AN
Color, Severity	Units	6/11/2007	AH
Color, Severity	Units	6/12/2007	AN
Color, Severity	Units	6/13/2007	AN
Color, Severity	Units	6/14/2007	AN
Color, Severity	Units	6/15/2007	AN
Color, Severity	Units	6/16/2007	AN
Color, Severity	Units	6/17/2007	AN
Color, Severity	Units	6/18/2007	AH
Color, Severity	Units	6/19/2007	AN
Color, Severity	Units	6/20/2007	AN
Color, Severity	Units	6/21/2007	AN
Color, Severity	Units	6/22/2007	AN
Color, Severity	Units	6/23/2007	AN
Color, Severity	Units	6/24/2007	AN
Color, Severity	Units	6/25/2007	AH
Color, Severity	Units	6/26/2007	AN
Color, Severity	Units	6/27/2007	AN
Color, Severity	Units	6/28/2007	AN
Color, Severity	Units	6/29/2007	AN
Color, Severity	Units	6/30/2007	AN
Dissolved Oxygen	mg/l	5/4/2007	AH
Dissolved Oxygen	mg/l	5/11/2007	AH
Dissolved Oxygen	mg/l	5/18/2007	AH
Dissolved Oxygen	mg/l	5/25/2007	AH
Dissolved Oxygen	mg/l	6/4/2007	AH

Parameter	Units	Date	A Code
Dissolved Oxygen	mg/l	6/11/2007	AH
Dissolved Oxygen	mg/l	6/18/2007	AH
Dissolved Oxygen	mg/l	6/25/2007	AH
pH	S.U.	5/4/2007	AH
pH	S.U.	5/11/2007	AH
pH	S.U.	5/18/2007	AH
pH	S.U.	5/25/2007	AH
pH	S.U.	6/4/2007	AH
pH	S.U.	6/11/2007	AH
pH	S.U.	6/18/2007	AH
pH	S.U.	6/25/2007	AH
Total Suspended Solids	mg/l	5/4/2007	AH
Total Suspended Solids	mg/l	6/4/2007	AH
Nitrogen, Ammonia (NH3)	mg/l	5/4/2007	AH
Nitrogen, Ammonia (NH3)	mg/l	6/4/2007	AH
Odor, Severity	Units	5/1/2007	AN
Odor, Severity	Units	5/2/2007	AN
Odor, Severity	Units	5/3/2007	AN
Odor, Severity	Units	5/4/2007	AH
Odor, Severity	Units	5/5/2007	AN
Odor, Severity	Units	5/6/2007	AN
Odor, Severity	Units	5/7/2007	AN
Odor, Severity	Units	5/8/2007	AN
Odor, Severity	Units	5/9/2007	AN
Odor, Severity	Units	5/10/2007	AN
Odor, Severity	Units	5/11/2007	AH
Odor, Severity	Units	5/12/2007	AN
Odor, Severity	Units	5/13/2007	AN
Odor, Severity	Units	5/14/2007	AN
Odor, Severity	Units	5/15/2007	AN
Odor, Severity	Units	5/16/2007	AN
Odor, Severity	Units	5/17/2007	AN
Odor, Severity	Units	5/18/2007	AH
Odor, Severity	Units	5/19/2007	AN
Odor, Severity	Units	5/20/2007	AN
Odor, Severity	Units	5/21/2007	AN
Odor, Severity	Units	5/22/2007	AN
Odor, Severity	Units	5/23/2007	AN
Odor, Severity	Units	5/24/2007	AN
Odor, Severity	Units	5/25/2007	AH
Odor, Severity	Units	5/26/2007	AN
Odor, Severity	Units	5/27/2007	AN
Odor, Severity	Units	5/28/2007	AN
Odor, Severity	Units	5/29/2007	AN

Parameter	Units	Date	A Code
Odor, Severity	Units	5/30/2007	AN
Odor, Severity	Units	5/31/2007	AN
Odor, Severity	Units	6/1/2007	AN
Odor, Severity	Units	6/2/2007	AN
Odor, Severity	Units	6/3/2007	AN
Odor, Severity	Units	6/4/2007	AH
Odor, Severity	Units	6/5/2007	AN
Odor, Severity	Units	6/6/2007	AN
Odor, Severity	Units	6/7/2007	AN
Odor, Severity	Units	6/8/2007	AN
Odor, Severity	Units	6/9/2007	AN
Odor, Severity	Units	6/10/2007	AN
Odor, Severity	Units	6/11/2007	AH
Odor, Severity	Units	6/12/2007	AN
Odor, Severity	Units	6/13/2007	AN
Odor, Severity	Units	6/14/2007	AN
Odor, Severity	Units	6/15/2007	AN
Odor, Severity	Units	6/16/2007	AN
Odor, Severity	Units	6/17/2007	AN
Odor, Severity	Units	6/18/2007	AH
Odor, Severity	Units	6/19/2007	AN
Odor, Severity	Units	6/20/2007	AN
Odor, Severity	Units	6/21/2007	AN
Odor, Severity	Units	6/22/2007	AN
Odor, Severity	Units	6/23/2007	AN
Odor, Severity	Units	6/24/2007	AN
Odor, Severity	Units	6/25/2007	AH
Odor, Severity	Units	6/26/2007	AN
Odor, Severity	Units	6/27/2007	AN
Odor, Severity	Units	6/28/2007	AN
Odor, Severity	Units	6/29/2007	AN
Odor, Severity	Units	6/30/2007	AN
Turbidity, Severity	Units	5/1/2007	AN
Turbidity, Severity	Units	5/2/2007	AN
Turbidity, Severity	Units	5/3/2007	AN
Turbidity, Severity	Units	5/4/2007	AH
Turbidity, Severity	Units	5/5/2007	AN
Turbidity, Severity	Units	5/6/2007	AN
Turbidity, Severity	Units	5/7/2007	AN
Turbidity, Severity	Units	5/8/2007	AN
Turbidity, Severity	Units	5/9/2007	AN
Turbidity, Severity	Units	5/10/2007	AN
Turbidity, Severity	Units	5/11/2007	AH
Turbidity, Severity	Units	5/12/2007	AN

Parameter	Units	Date	A Code
Turbidity, Severity	Units	5/13/2007	AN
Turbidity, Severity	Units	5/14/2007	AN
Turbidity, Severity	Units	5/15/2007	AN
Turbidity, Severity	Units	5/16/2007	AN
Turbidity, Severity	Units	5/17/2007	AN
Turbidity, Severity	Units	5/18/2007	AH
Turbidity, Severity	Units	5/19/2007	AN
Turbidity, Severity	Units	5/20/2007	AN
Turbidity, Severity	Units	5/21/2007	AN
Turbidity, Severity	Units	5/22/2007	AN
Turbidity, Severity	Units	5/23/2007	AN
Turbidity, Severity	Units	5/24/2007	AN
Turbidity, Severity	Units	5/25/2007	AH
Turbidity, Severity	Units	5/26/2007	AN
Turbidity, Severity	Units	5/27/2007	AN
Turbidity, Severity	Units	5/28/2007	AN
Turbidity, Severity	Units	5/29/2007	AN
Turbidity, Severity	Units	5/30/2007	AN
Turbidity, Severity	Units	5/31/2007	AN
Turbidity, Severity	Units	6/1/2007	AN
Turbidity, Severity	Units	6/2/2007	AN
Turbidity, Severity	Units	6/3/2007	AN
Turbidity, Severity	Units	6/4/2007	AH
Turbidity, Severity	Units	6/5/2007	AN
Turbidity, Severity	Units	6/6/2007	AN
Turbidity, Severity	Units	6/7/2007	AN
Turbidity, Severity	Units	6/8/2007	AN
Turbidity, Severity	Units	6/9/2007	AN
Turbidity, Severity	Units	6/10/2007	AN
Turbidity, Severity	Units	6/11/2007	AH
Turbidity, Severity	Units	6/12/2007	AN
Turbidity, Severity	Units	6/13/2007	AN
Turbidity, Severity	Units	6/14/2007	AN
Turbidity, Severity	Units	6/15/2007	AN
Turbidity, Severity	Units	6/16/2007	AN
Turbidity, Severity	Units	6/17/2007	AN
Turbidity, Severity	Units	6/18/2007	AH
Turbidity, Severity	Units	6/19/2007	AN
Turbidity, Severity	Units	6/20/2007	AN
Turbidity, Severity	Units	6/21/2007	AN
Turbidity, Severity	Units	6/22/2007	AN
Turbidity, Severity	Units	6/23/2007	AN
Turbidity, Severity	Units	6/24/2007	AN
Turbidity, Severity	Units	6/25/2007	AH

Parameter	Units	Date	A Code
Turbidity, Severity	Units	6/26/2007	AN
Turbidity, Severity	Units	6/27/2007	AN
Turbidity, Severity	Units	6/28/2007	AN
Turbidity, Severity	Units	6/29/2007	AN
Turbidity, Severity	Units	6/30/2007	AN
Fecal Coliform	#/100 ml	5/4/2007	AH
Fecal Coliform	#/100 ml	6/4/2007	AH
CBOD 5 day	mg/l	5/4/2007	AH
CBOD 5 day	mg/l	6/4/2007	AH