

**Environmental  
Protection Agency**

Gov. Scott, Governor  
Lieke Martens, Lt. Governor  
John R. Meyer, Director

July 22, 2010

RE: GEAUGA COUNTY  
CHARDON TWP  
WILDER MHP  
NPDES #3PV00128

Mr. Fred Wilder  
Wilder MHP  
10865 Chardon Road  
Chardon, OH 44024

Dear Mr. Wilder:

On July 13, 2010, this conducted an inspection of the sewage treatment plant serving the above referenced facility. The intent of the inspection was to review operations and maintenance of the wastewater treatment plant and compliance with your NPDES permit.

A permit to install for wastewater treatment plant upgrades was submitted to this office on June 22, 2010. The permit to install is currently under review in this office. Any review comments shall be addressed to the consulting engineer, Hess & Associates with a copy submitted to the owner. This office understands the proposal for the PTI is to abandon the north wastewater treatment plant and increase the capacity of the south plant. The project proposes to maintain the north outfall (002) by pumping effluent from the upgraded plant back to the north outfall.

At the time of the inspection, both the north and south plants were producing what appeared to be a satisfactory quality effluent. Below are the findings and recommendations from the inspection:

INSPECTION

North Plant:

The contents of the aeration tank were a chocolate brown color and provided with adequate air supply with satisfactory rollover within the tank. The sludge return lines were in operation and returning a good amount of solids. The contents of the clarifier appeared turbid with some solids on the surface. The chlorination tank appeared to be in satisfactory condition with disinfection treatment provided.

South Plant:

The aeration tank was provided with adequate air circulation and the contents of the tank were a chocolate brown color. The rollover within the aeration tank was

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satisfactory and the sludge return lines were in operation. The surface of the clarifier had some solids accumulation and the weirs and baffle contained solids. The chlorination tank was operating and appeared to be in satisfactory condition. The surface sand filters contained solids and vegetation and must be cleaned out.

### NPDES PERMIT

The current permit expires January 31, 2014. The Water Quality Standards (WQS) have been revised to reference e-coli bacteria versus fecal coliform. As such, upon permit renewal, your facility will be given a compliance schedule to obtain compliance with the WQS for e-coli. The renewal permit will reference fecal coliform limits with e-coli monitoring for the first disinfection season. The final table will include e-coli limits.

In accordance with Part III, item 5, of the NPDES permit, testing procedures for the parameters specified by the NPDES permit must conform to regulation 40 CFR 136 which includes proper preservation of the samples. The samples must also be chilled to 6°C following collection and during transportation. Please be aware, any data reported that has not been conducted in accordance with 40 CFR 136 criteria is invalid and a violation of the NPDES permit.

The wastewater treatment plant is currently classified by the Ohio EPA as a Class A wastewater treatment facility. This classification is located in the NPDES permit which had an effective date of February 1, 2009. New operator and plant certification rules have gone in effect and are found in OAC 3745-7-04. The new regulations provide the plant classification rankings and operator staffing requirements. According to OAC 3745-7-04, the minimum staffing requirements for a Class A facility is 2 days per week for a minimum of 1 hour per week.

The eDMR PIN for this facility must be assigned to an individual who has working knowledge of the facility and wastewater treatment plant. Please be aware, federal regulations require a DMR be submitted by a "responsible official" or a "duly authorized representative" of the responsible official. Both terms are defined in the federal regulations. The NPDES permit for the Wilder MHP WWTP contains language quoted directly from the federal regulation (Title 40 of the Code of Federal Regulations, Part 122.22) that designates who may submit DMR data. As an example, you may have a lab fill out the form, since there is no restriction on who may fill out the DMR. However, the lab cannot legally submit those DMR's. A lab does not meet the definition of "responsible official" or "duly authorized representative" of a responsible official because the lab does not have "responsibility for the overall operation" of the facility, or meet any of the more specific requirements of the federal regulations. An Operator in Responsible Charge of a facility definitely meets the requirements of a duly authorized representative. The responsible official for the facility must make the arrangements to either submit the DRM's themselves by obtaining a PIN, or go through the eBusiness

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Center to delegate submit privileges to someone who meets the definition of a duly authorized representative. This delegated person would need to obtain their own PIN.

Guidance documents are available on the following web page:  
<http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx> If you have any questions regarding the process, please e-mail your concern to [Jamie.Roberts@epa.state.oh.us](mailto:Jamie.Roberts@epa.state.oh.us)

#### VIOLATION SUMMARY

A summary of the wastewater treatment plant monitoring violations for the period of January 1, 2007 through July 1, 2010 has been attached to this letter. Any reporting errors or eDMR errors must be reported to this office so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.  
Environmental Engineer  
Division of Surface Water

LAW/mt

Enclosures: Violation summary  
ORC Form

pc: Geauga County Health Department

Discharge Violations:

<u>Reporting Period</u>	<u>Station</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
August 2009	001	31616	Fecal Coliform	30D Conc	200	470.	8/1/2009
August 2009	001	31616	Fecal Coliform	7D Conc	400	470.	8/22/2009
June 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.0	4.4332	6/1/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	13.32	6/1/2010