



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

June 16, 2009

RE: LAKE COUNTY
KIRTLAND
PAOLUCCI PLAZA
7621 CHARDON ROAD
NPDES PERMIT NO. 3PR00490
APPLICATION NO. OH0140767

Mr. George Paolucci
7458 Briar Hill Road
Kirtland, OH 44094

Dear Mr. Paolucci:

On June 10, 2009, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves Paolucci Plaza. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits.

Wastewater Treatment Plant Observations

At the time of inspection, the plant was producing an effluent free of debris, oil or grease. The following observations are noted:

- The aeration tank was operational. The mixed liquor and return sludge line was brown in color and contained a high mixed liquor suspended solids level.
- An excessive amount of sludge was on the surface of the settling tank, behind the baffles and the tank's effluent trough. Consideration should be given to adjusting the sludge return rate and the sludge wasting rate for this facility.
- The filter beds had an excessive amount of vegetation and sludge on their surfaces. The vegetation and any sludge laden sand must be removed. Each filter bed must contain 18 inches of Ohio EPA approved filter sand. Approved filter sand consists of clean and washed sand with an effective size between 0.4 and 1.0 mm and a uniformity coefficient not greater than 3.0. The filter sand must be raked with an even distributed across the surface area of the bed. The filter beds must be routinely switched to maximize the performance of the filter beds.
- The chlorine contact chamber contained an excessive amount of algae. The algae and any other vegetation should be removed from the chlorine contact chamber.
- The chlorinator contained no chlorine tablets for disinfection. Chlorine tablets are required in the chlorinator from May 1st through October 31st of each year.
- The plant has no dechlorination facilities. Dechlorination facilities are needed to limit the chlorine residual in the plant effluent to 0.019 mg/l.

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- The wastewater treatment plant is not secure. The access gratings are not locked and are a potential safety hazard. If locks are to be placed on the gratings, please be aware that Ohio EPA will still require access to the plant for inspections that are often times unannounced.

The above referenced deficiencies must be corrected immediately.

NPDES Permit Violations

A review of our records reveals that you have not submitted Discharge Monitoring Reports (DMRs) since the effective date of the NPDES permit, October 1, 2008. Each month, DMRs must be submitted to the Central Office of Ohio EPA. Your NPDES permit requires monitoring and/or analytical testing for Odor, Color, Turbidity, Total Suspended Solids, CBOD-5day, Dissolved Oxygen, Fecal Coliform, Chlorine Residual and Ammonia Nitrogen. Please refer to Table I of the NPDES permit for specific information. You must obtain the services of a laboratory familiar with the requirements for wastewater treatment plant analyses.

Your NPDES permit required you to submit to this agency, the information regarding the operator-of-record for this facility. To date, this agency has not received the required information. Attached with this letter is an Operator of Record Notification form. Please complete the form and return it to our Columbus, Office. Please be aware that both the owner and operator of record must sign the form.

Also, pursuant to Ohio Administrative Code 3745-7-09, effective December 21, 2006, this Agency requires the owner and operator of record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. As stated in your NPDES permit, the records shall be housed onsite and shall be accessible for twenty-four hour inspection. Please inform this office of the proposed location for the operation and maintenance records. The following information must be recorded and kept on site:

1. Identification of the sewage treatment works;
2. Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
3. Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced;
4. Results of tests performed and samples taken, unless documented on a laboratory sheet;
5. Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced; and
6. Identification of the persons making entries.

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Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111. Enforcement actions may include a monetary penalty.

Actions to be Taken by Permittee

Within 10 days of the date of this letter, you are directed to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E
Environmental Engineer
Division of Surface Water

MU/mt

Enclosure – Operator of Record Form