



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

November 4, 2010

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 November 3, 2010, 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 dark brown in color. The return line discharge was light brown in color.
- The settling tank wastewater was turbid. An excessive amount of sludge was behind the baffles. 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, sludge 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 distribution across the surface area of the bed. The filter beds must be routinely switched to maximize the performance of the filter beds.
- This facility contains chlorination facilities for disinfection, but no dechlorination facilities. ***When the disinfection season commences again on May 1, 2011, dechlorination facilities must have been installed.***

The above referenced deficiencies must be corrected immediately.

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NPDES Permit Violations

A review of the Discharge Monitoring Reports (DMRs) covering July 2009 through September 2010 revealed the following frequency violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	30D Conc	10	20.	12/1/2009
001	80082	CBOD 5 day	7D Conc	15	20.	12/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.9	12/1/2009

The following frequency violations were revealed:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2009	001	00056	Flow Rate	1/Month	1	0	12/01/2009
December 2009	001	00010	Water Temperature	1/Week	1	0	12/08/2009
December 2009	001	00083	Color, Severity	1/Week	1	0	12/08/2009
December 2009	001	01330	Odor, Severity	1/Week	1	0	12/08/2009
December 2009	001	01350	Turbidity, Severity	1/Week	1	0	12/08/2009
December 2009	001	00010	Water Temperature	1/Week	1	0	12/15/2009
December 2009	001	00083	Color, Severity	1/Week	1	0	12/15/2009
December 2009	001	01330	Odor, Severity	1/Week	1	0	12/15/2009
December 2009	001	01350	Turbidity, Severity	1/Week	1	0	12/15/2009
December 2009	001	00010	Water Temperature	1/Week	1	0	12/22/2009
December 2009	001	00083	Color, Severity	1/Week	1	0	12/22/2009
December 2009	001	01330	Odor, Severity	1/Week	1	0	12/22/2009
December 2009	001	01350	Turbidity, Severity	1/Week	1	0	12/22/2009
January 2010	001	00010	Water Temperature	1/Week	1	0	01/01/2010
January 2010	001	00083	Color, Severity	1/Week	1	0	01/01/2010
January 2010	001	01330	Odor, Severity	1/Week	1	0	01/01/2010
January 2010	001	01350	Turbidity, Severity	1/Week	1	0	01/01/2010
January 2010	001	00010	Water Temperature	1/Week	1	0	01/15/2010
January 2010	001	00083	Color, Severity	1/Week	1	0	01/15/2010
January 2010	001	01330	Odor, Severity	1/Week	1	0	01/15/2010
January 2010	001	01350	Turbidity, Severity	1/Week	1	0	01/15/2010
January 2010	001	00010	Water Temperature	1/Week	1	0	01/22/2010
January 2010	001	00083	Color, Severity	1/Week	1	0	01/22/2010
January 2010	001	01330	Odor, Severity	1/Week	1	0	01/22/2010
January 2010	001	01350	Turbidity, Severity	1/Week	1	0	01/22/2010
April 2010	001	00010	Water Temperature	1/Week	1	0	04/15/2010
April 2010	001	00083	Color, Severity	1/Week	1	0	04/15/2010
April 2010	001	01330	Odor, Severity	1/Week	1	0	04/15/2010
April 2010	001	01350	Turbidity, Severity	1/Week	1	0	04/15/2010
April 2010	001	00010	Water Temperature	1/Week	1	0	04/22/2010
April 2010	001	00083	Color, Severity	1/Week	1	0	04/22/2010

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Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
April 2010	001	01330	Odor, Severity	1/Week	1	0	04/22/2010
April 2010	001	01350	Turbidity, Severity	1/Week	1	0	04/22/2010
May 2010	001	00010	Water Temperature	1/Week	1	0	05/01/2010
May 2010	001	00083	Color, Severity	1/Week	1	0	05/01/2010
May 2010	001	01330	Odor, Severity	1/Week	1	0	05/01/2010
May 2010	001	01350	Turbidity, Severity	1/Week	1	0	05/01/2010
May 2010	001	00010	Water Temperature	1/Week	1	0	05/15/2010
May 2010	001	00083	Color, Severity	1/Week	1	0	05/15/2010
May 2010	001	01330	Odor, Severity	1/Week	1	0	05/15/2010
May 2010	001	01350	Turbidity, Severity	1/Week	1	0	05/15/2010
May 2010	001	00010	Water Temperature	1/Week	1	0	05/22/2010
May 2010	001	00083	Color, Severity	1/Week	1	0	05/22/2010
May 2010	001	01330	Odor, Severity	1/Week	1	0	05/22/2010
May 2010	001	01350	Turbidity, Severity	1/Week	1	0	05/22/2010

In addition, our records reveal that you have not submitted Discharge Monitoring Reports (DMRs) for the months of July 2009, August 2009, September 2009, October 2009, November 2009, December 2009, June 2010, August 2010 and September 2010.

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 (ORC) Notification Form*. **Please immediately complete the ORC 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 onsite:

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;

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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.

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 Notification Form