



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

July 29, 2008

RE: LAKE COUNTY
KIRTLAND
HOLDEN ARBORETUM
LANTERN COURT
9203 KIRTLAND-CHARDON ROAD
NPDES PERMIT NO. 3PR00474
NOTICE OF VIOLATION

Clem Hamilton, Director
Holden Arboretum
9500 Sperry Road
Kirtland, OH 44094

Dear Mr. Hamilton:

On July 24, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves Lantern Court. 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. Mr. Rick Wilson represented Holden Arboretum during the inspection.

At the time of inspection, the plant was producing an effluent of satisfactory visual quality in that there was no evidence of foam, debris, oil or grease. The wastewater treatment plant consists of a trash trap, septic tanks, surface sand filters and a chlorine contact chamber.

The following observations were noted:

- The filter beds are covered with screens. An excessive amount of leaves has accumulated on the filter screens. The leaves should be removed from the screens. Also, assurance must be made that each filter bed contains 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 filter bed. The filter beds must be routinely switched to maximize the performance of the filter beds.
- The chlorinator in the chlorine contact chamber contained chlorine tablets for disinfection, as required. The chamber contained no dechlorinator.

The above referenced deficiencies must be corrected.

A review of the discharge monitoring reports, covering the period January 2008 through June 2008 revealed no effluent limitation violations.

The average daily design flow of the wastewater treatment plant (800 gpd) is being reported on the discharge monitoring reports as the daily estimated flow. This practice is not acceptable. Acceptable methods for estimating daily flow are, in order of preference: 1) elapsed time meters on sand filter dosing pumps; 2) elapsed time meters on influent pumps; 3) water use records.

This office does not have record of receipt of the discharge monitoring report for January 2008. Please immediately submit to this agency, the January 2008 discharge monitoring report data.

The NPDES permit has a schedule of compliance for the upgrade of the wastewater treatment plant. On May 20, 2008 this agency issued a Permit to Install for construction of the proposed upgrade. The schedule of compliance requires commencement of construction by May 1, 2008 and completion of construction by August 1, 2008. The upgraded plant must attain operational level and the final effluent limits of the NPDES permit must be met by September 1, 2008.

Construction of the upgraded plant has not commenced. You are currently in violation of the NPDES permit for Lantern Court.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting or compliance schedule requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

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. The records shall be housed onsite and shall be accessible for twenty-four hour inspection. The following information must be recorded:

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.

Please review the administrative code carefully for information on all requirements. The Holden Arboretum must immediately make provisions for onsite operation and maintenance records.

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Please inform this office, in writing, within ten (10) days of receipt of this notification as to the reasons for the above referenced violations and deficiencies, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

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

Sincerely,

A handwritten signature in black ink that reads "Marie Underwood". The signature is written in a cursive style with a large, looping initial "M".

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

MU/mh

cc: Liberato Picciano, Facilities Manager