



State of Ohio Environmental Protection Agency

Northeast District Office

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

August 5, 2008

RE: LAKE COUNTY  
MADISON TWP.  
HOLLY RIDGE APARTMENTS  
NPDES PERMIT NO. 3PR00376  
APPLICATION NO. OH0134651

Mr. Johnny Tetrick  
P.O. Box 19451  
Cleveland, OH 44119

Dear Mr. Tetrick:

On July 24, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves the above referenced facility. 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.

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

1. The flow equalization tank was not in operation, in that no air was being introduced to the tank. Your NPDES permit requires that all treatment units remain operational. Air must be provided for the raw sewage that enters the flow equalization tank, as required by the approved permit-to-install that was issued by this agency.
2. The aeration tank was operating in a satisfactory manner.
3. The settling tank content was turbid. The settling tank had excessive sludge on its surface. The tank's effluent trough was blocked with sludge. The return sludge rate should be readjusted. The sludge blocking the trough must be removed.
4. The east filter bed had some vegetation on its surface. The vegetation and the top layer of solids laden sand must be removed. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on the bed. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed.
5. The chlorinator was filled with chlorine tablets, as required.

MR. JOHNNY TETRICK  
 HOLLY RIDGE APARTMENTS  
 AUGUST 5, 2008  
 PAGE 2

6. The dechlorinator contained sulfite tablets, as required.
7. The sludge holding tank contained a portable pump and flexible pipe with the discharge end of the flexible pipe laying in the sludge drying bed. This arrangement is not consistent with the approved design for the wastewater treatment plant. The plant was approved for construction on December 28, 1992 and requires a submersible pump with permanent, hard piping.
8. The sludge drying beds were full of weeds. The weeds must be removed from the drying beds. Assurance must be made that the drying beds contain the appropriate amount of sand (i.e., nine inches of sand over the gravel above the underdrains). Sand for sludge drying beds should have an effective size of 0.25 to 0.5 mm with a uniformity coefficient less than 4.0.

The above referenced deficiencies should be corrected immediately.

A review of the discharge monitoring reports covering the period of May 2007 to June 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Qty	0.545	1.18872	6/1/2008
001	00530	Total Suspended Solids	7D Qty	0.817	1.18872	6/1/2008
001	80082	CBOD 5 day	30D Qty	0.454	.95097	6/1/2008
001	80082	CBOD 5 day	7D Qty	0.681	.95097	6/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.26	5/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.94	7/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	4.94	7/8/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	.15779	7/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	.15779	7/8/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.4	6/1/2007

Also, the review of the discharge monitoring reports covering the period of May 2007 to June 2008 revealed the following effluent monitoring frequency violations:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Day	1	0	06/02/2007
001	01330	Odor, Severity	1/Day	1	0	06/02/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/02/2007
001	00056	Flow Rate	1/Day	1	0	06/02/2007
001	00083	Color, Severity	1/Day	1	0	06/03/2007
001	01330	Odor, Severity	1/Day	1	0	06/03/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/03/2007

MR. JOHNNY TETRICK  
 HOLLY RIDGE APARTMENTS  
 AUGUST 5, 2008  
 PAGE 4

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01350	Turbidity, Severity	1/Day	1	0	06/14/2007
001	00056	Flow Rate	1/Day	1	0	06/14/2007
001	00083	Color, Severity	1/Day	1	0	06/15/2007
001	01330	Odor, Severity	1/Day	1	0	06/15/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/15/2007
001	00056	Flow Rate	1/Day	1	0	06/15/2007
001	00083	Color, Severity	1/Day	1	0	06/16/2007
001	01330	Odor, Severity	1/Day	1	0	06/16/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/16/2007
001	00056	Flow Rate	1/Day	1	0	06/16/2007
001	00083	Color, Severity	1/Day	1	0	06/17/2007
001	01330	Odor, Severity	1/Day	1	0	06/17/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/17/2007
001	00056	Flow Rate	1/Day	1	0	06/17/2007
001	00083	Color, Severity	1/Day	1	0	06/18/2007
001	01330	Odor, Severity	1/Day	1	0	06/18/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/18/2007
001	00056	Flow Rate	1/Day	1	0	06/18/2007
001	00083	Color, Severity	1/Day	1	0	06/19/2007
001	01330	Odor, Severity	1/Day	1	0	06/19/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/19/2007
001	00056	Flow Rate	1/Day	1	0	06/19/2007
001	00083	Color, Severity	1/Day	1	0	06/20/2007
001	01330	Odor, Severity	1/Day	1	0	06/20/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/20/2007
001	00056	Flow Rate	1/Day	1	0	06/20/2007
001	00083	Color, Severity	1/Day	1	0	06/21/2007
001	01330	Odor, Severity	1/Day	1	0	06/21/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/21/2007
001	00056	Flow Rate	1/Day	1	0	06/21/2007
001	00083	Color, Severity	1/Day	1	0	06/22/2007
001	01330	Odor, Severity	1/Day	1	0	06/22/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/22/2007
001	00056	Flow Rate	1/Day	1	0	06/22/2007
001	00083	Color, Severity	1/Day	1	0	06/23/2007
001	01330	Odor, Severity	1/Day	1	0	06/23/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/23/2007
001	00056	Flow Rate	1/Day	1	0	06/23/2007
001	00083	Color, Severity	1/Day	1	0	06/24/2007
001	01330	Odor, Severity	1/Day	1	0	06/24/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/24/2007
001	00056	Flow Rate	1/Day	1	0	06/24/2007
001	00083	Color, Severity	1/Day	1	0	06/25/2007

MR. JOHNNY TETRICK  
 HOLLY RIDGE APARTMENTS  
 AUGUST 5, 2008  
 PAGE 5

Station	Reporting		Sample			Violation
	Code	Parameter	Frequency	Expected	Reported	Date
001	01330	Odor, Severity	1/Day	1	0	06/25/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/25/2007
001	00056	Flow Rate	1/Day	1	0	06/25/2007
001	00083	Color, Severity	1/Day	1	0	06/26/2007
001	01330	Odor, Severity	1/Day	1	0	06/26/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/26/2007
001	00056	Flow Rate	1/Day	1	0	06/26/2007
001	00083	Color, Severity	1/Day	1	0	06/27/2007
001	01330	Odor, Severity	1/Day	1	0	06/27/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/27/2007
001	00056	Flow Rate	1/Day	1	0	06/27/2007
001	00083	Color, Severity	1/Day	1	0	06/28/2007
001	01330	Odor, Severity	1/Day	1	0	06/28/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/28/2007
001	00056	Flow Rate	1/Day	1	0	06/28/2007
001	00083	Color, Severity	1/Day	1	0	06/29/2007
001	01330	Odor, Severity	1/Day	1	0	06/29/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/29/2007
001	00056	Flow Rate	1/Day	1	0	06/29/2007
001	00083	Color, Severity	1/Day	1	0	06/30/2007
001	01330	Odor, Severity	1/Day	1	0	06/30/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/30/2007
001	00056	Flow Rate	1/Day	1	0	06/30/2007
001	50060	Chlorine, Total Residual	1/2Wks	1	0	08/15/2007

During the months of May 2008 and June 2008, the reported flow estimates exceed 30,000 gpd. This is greater than the permitted discharge flow for this facility, which is 12,000 gpd. Please provide an explanation for the high flows. Has there been a significant increase in the number of residents at this facility? Are clean water connections contributing to the flow estimates?

Your NPDES requires that Ohio EPA representatives have access to the wastewater treatment plant during normal business hours for inspections. Many times the inspections are unannounced. When this writer attempted to inspect the plant in the month of June, there was no one around to unlock the gate to the wastewater treatment plant. Please inform this office, in writing, of the steps that will be taken to make sure access to the plant will be available for Ohio EPA inspectors.

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.

MR. JOHNNY TETRICK  
 HOLLY RIDGE APARTMENTS  
 AUGUST 5, 2008  
 PAGE 3

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Day	1	0	06/03/2007
001	00083	Color, Severity	1/Day	1	0	06/04/2007
001	01330	Odor, Severity	1/Day	1	0	06/04/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/04/2007
001	00056	Flow Rate	1/Day	1	0	06/04/2007
001	00083	Color, Severity	1/Day	1	0	06/05/2007
001	01330	Odor, Severity	1/Day	1	0	06/05/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/05/2007
001	00056	Flow Rate	1/Day	1	0	06/05/2007
001	00083	Color, Severity	1/Day	1	0	06/06/2007
001	01330	Odor, Severity	1/Day	1	0	06/06/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/06/2007
001	00056	Flow Rate	1/Day	1	0	06/06/2007
001	00083	Color, Severity	1/Day	1	0	06/07/2007
001	01330	Odor, Severity	1/Day	1	0	06/07/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/07/2007
001	00056	Flow Rate	1/Day	1	0	06/07/2007
001	00083	Color, Severity	1/Day	1	0	06/08/2007
001	01330	Odor, Severity	1/Day	1	0	06/08/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/08/2007
001	00056	Flow Rate	1/Day	1	0	06/08/2007
001	00083	Color, Severity	1/Day	1	0	06/09/2007
001	01330	Odor, Severity	1/Day	1	0	06/09/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/09/2007
001	00056	Flow Rate	1/Day	1	0	06/09/2007
001	00083	Color, Severity	1/Day	1	0	06/10/2007
001	01330	Odor, Severity	1/Day	1	0	06/10/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/10/2007
001	00056	Flow Rate	1/Day	1	0	06/10/2007
001	00083	Color, Severity	1/Day	1	0	06/11/2007
001	01330	Odor, Severity	1/Day	1	0	06/11/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/11/2007
001	00056	Flow Rate	1/Day	1	0	06/11/2007
001	00083	Color, Severity	1/Day	1	0	06/12/2007
001	01330	Odor, Severity	1/Day	1	0	06/12/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/12/2007
001	00056	Flow Rate	1/Day	1	0	06/12/2007
001	00083	Color, Severity	1/Day	1	0	06/13/2007
001	01330	Odor, Severity	1/Day	1	0	06/13/2007
001	01350	Turbidity, Severity	1/Day	1	0	06/13/2007
001	00056	Flow Rate	1/Day	1	0	06/13/2007
001	00083	Color, Severity	1/Day	1	0	06/14/2007
001	01330	Odor, Severity	1/Day	1	0	06/14/2007

MR. JOHNNY TETRICK  
HOLLY RIDGE APARTMENTS  
AUGUST 5, 2008  
PAGE 6

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 on site and shall be accessible for 24-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.

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies. Also, inform this office, in writing, of the final disposal destination of the dried sludge that is generated at the plant.

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/mh