



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 23, 2011

RE: LAKE COUNTY
LEROY TWP.
CEDAR HILL CONFERENCE CENTER WWTP
NPDES PERMIT NO. 3PR00178
APPLICATION NO. OH0123641

Mr. Peter W. Nielsen, III
Cedar Hills Conference Center
5811 Vrooman Road
Painesville, OH 44077

Dear Mr. Nielsen:

On June 15, 2011, this writer conducted a pre-permit inspection of the wastewater treatment plant (WWTP) that serves the above referenced facility. The inspection was prompted by the anticipated renewal of the National Pollutant Discharge Elimination System (NPDES) permit. You accompanied this writer during the inspection.

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

1. The flow equalization unit was not in operation. All treatment components must be placed in operation, in accordance with the approved detail design plans for the facility.
2. The grating covering part of the aeration tank had rusted out and a section of a wooden crate was placed on top the tank. This is not acceptable and poses as a potential safety risk. The tank must be covered with a durable tank grating.
3. The aeration tank content was light brown in color, indicating a weak mixed liquor. The return sludge discharge was also light brown. The skimmer discharge line was not operating. The organic content of the mixed liquor needs to be increased.
4. The settling tank content was turbid.
5. The two filter beds were covered with an excessive amount of vegetation. The vegetation and any sludge or sludge laden sand must be removed from the surface of the filters. Assurances must be made that 18 inches of clean, Ohio EPA approved filter sand exists on the beds. 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.
6. Disinfection of the effluent was occurring; however, the chlorinator contained an excessive amount of chlorine tablets. Ideally, only a few tablets should be placed in the chlorinator, so that water can freely flow through the chlorinator without the tablets turning into a mush. Chlorination must take place during the summer disinfection season, May 1st through October 31st.
7. The dechlorinator contained sulfite tablets, as required.

During the inspection, you stated that the facility just opened two weeks ago. Your maintenance worker had recently left and a new maintenance worker will start employment on June 20, 2011. As requested, this writer has enclosed with this letter, the Ohio EPA guidance document on the operation and maintenance guidelines for extended aeration plants.

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A review of the Discharge Monitoring Reports covering the period of August 2009 through April 2011 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	8.47	8/3/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	8.47	8/1/2009
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.034	.40394	8/3/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.023	.40394	8/1/2009
001	00530	Total Suspended Solids	30D Qty	0.27	.37812	6/1/2010

A review of the Discharge Monitoring Reports covering the same period revealed the following effluent monitoring frequency violations:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Month	1	0	12/01/2010

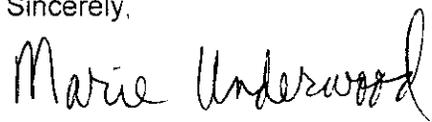
Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

The NPDES permit will be drafted soon. When the permit is public noticed, please review it carefully. A 30-day comment period will be provided. All comments must be in writing and should be directed to this district office.

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.

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

Enclosures - Ohio EPA O & M Guidance Document for EA plants