



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 15, 2008

RE: LAKE COUNTY
WILLOUGHBY HILLS
WILLO HILL PROFESSIONAL BUILDING
NPDES PERMIT NO. 3PR00449
APPLICATION NO. OH0139467

Mr. William Rackus
Willo Hill Professional Building
35005 Chardon Road
Willoughby Hills, OH 44094

Dear Mr. Rackus:

On October 2, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves Willo Hill Professional Building. 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 made:

- The aeration tank contained little activated sludge. The aeration tank content was light brown in color. The plant was underloaded. Steps should be taken to increase the organic content of the aeration tank.
- The settling tank content was turbid. The sludge return line was light brown in color and contained little activated sludge. Any accumulated sludge must be gently scraped toward the hopper bottom so that the sludge can be picked up by the sludge return pump.
- The filter beds contained excessive vegetation that requires removal. The vegetation and solids laden sand must be removed and replaced with clean sand. Also, assurances must be made that 18 inches of Ohio EPA approved filter sand exists on both 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 beds.
- The chlorinator contained no chlorine tablets and was disconnected from the entrance pipe to the chlorine contact tank, providing no disinfection of the effluent. The chlorinator must be re-connected. Chlorine must be added to the chlorinator. Disinfection of the plant effluent is required from May 1st to October 31st.
- This plant has no dechlorinator. The NPDES permit residual chlorine effluent limit is 0.019 mg/l. A dechlorinator must be installed to meet this limit.

A review of the Monthly Operating Reporting reports (MORs) covering the period of September 2007 through August 2008 revealed no effluent limitation violations.

The following frequency violations were revealed for this time period:

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	03/08/2008
001	00083	Color, Severity	1/Week	1	0	03/08/2008
001	01330	Odor, Severity	1/Week	1	0	03/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	03/08/2008
001	00010	Water Temperature	1/Week	1	0	03/15/2008
001	00083	Color, Severity	1/Week	1	0	03/15/2008
001	01330	Odor, Severity	1/Week	1	0	03/15/2008
001	01350	Turbidity, Severity	1/Week	1	0	03/15/2008

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.

This writer was unable to determine the location of the operation and maintenance record, required pursuant to Ohio Administrative Code (OAC) 3745-7-09 and described in this writer's letter dated October 12, 2007. Please notify this office, in writing, of the location of the operation and maintenance record. At a minimum, the log book must contain:

1. The 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 the administrative code;
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.

The administrative code must be carefully reviewed 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.

Should you have any comments or questions regarding this letter, please contact this writer at (330) 963-1183.

Sincerely,



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

MU/mt