

**Environmental  
Protection Agency**

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

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2010 SEP 20 PM 12:47  
NORTHWEST DISTRICT

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September 15, 2010

RE: LORAIN COUNTY  
COLUMBIA TWP.  
THE ACTIVITY CENTER  
(11300 ROOT RD.)  
(PERMIT NO. 3PR00487)

PNL Holdings  
ATTN: Don Porter  
30628 Detroit Rd., # 299  
Westlake, OH 44145

Dear Mr. Porter:

On August 17, 2010, a compliance inspection was conducted on the wastewater treatment plant (WWTP) serving The Activity Center located at 11300 Root Road, Columbia Township, Lorain County. The inspection was conducted by this writer, and Mr. John Sabo of the Lorain County Health Department. The previous inspection conducted was on July 22, 2009.

The purpose of the August 17<sup>th</sup> inspection was to evaluate the WWTP's operation and maintenance condition, and its compliance with NPDES Permit to discharge terms and conditions

At the time of the inspection, the following observations were made:

- 1) The flow equalization tank was in use and was being well aerated. Pumps in the flow equalization tank were in the 'AUTO' mode, and were operational when tested manually.
- 2) The aeration tank was not being aerated at the time of the inspection, and the contents of the aeration tank were dark brown to black in color. The aeration tank blowers were observed to be on a timer. However, when manually overridden, the blowers would not operate.
- 3) The return sludge and skimmer lines were not operating, and would not be unless the blowers were operating.
- 4) Contents of the settling tank were dark and turbid. The effluent trough in the settling tank some algae growth. The skimmer in the settling tank was not operating, and was set above the water level. The skimmer should be adjusted to approximately ¼ inch below the water surface.
- 5) Both pumps in the dosing station were set on 'AUTO', and did operate when tested manually. The high level alarm operated when manually tested. A totalizer was present in the electrical control box, and is available for use in determining pump usage frequency.
- 6) The east cell of the surface sand filters was in use, and contained a small amount of vegetative growth. The west cell was not in use at the time of the inspection, and also contained a slight amount of vegetative growth.

- 7) Disinfection of the effluent is being performed utilizing an Ultra Violet disinfection unit, which was operating.
- 8) The aerated sludge holding tank was not in operation, but did contain rainwater.

A review of the WWTP operating data for the period of July 1, 2009 through August 1, 2010, was conducted prior to the inspection. The electronic Discharge Monitoring Report (eDMR) data for that period found the following effluent numeric violations:

**THE ACTIVITY CENTER**  
**NPDES PERMIT # 3PR00487**  
**EFFLUENT NUMERIC VIOLATIONS**  
**(JUL. 1, '09 – Aug. 1, '10)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2009	Dissolved Oxygen	1D Conc	6.0	4.5	8/27/2009
December 2009	pH	1D Conc	6.5	2.9	12/2/2009

A review of the eDMRs for the same period also found the following reporting frequency violations for Granger Lakes Condominiums:

**THE ACTIVITY CENTER**  
**NPDES PERMIT # 3PR00487**  
**REPORTING FREQUENCY VIOLATIONS**  
**(JUL. 1, '09 – Aug. 1, '10)**

Reporting Period	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2010	00530	Total Suspended Solids	1/Quarter	1	0	03/01/2010
March 2010	00610	Nitrogen, Ammonia (NH3-N)	1/Quarter	1	0	03/01/2010
March 2010	80082	CBOD 5 day	1/Quarter	1	0	03/01/2010
March 2010	00400	pH	1/Quarter	1	0	03/01/2010
March 2010	00300	Dissolved Oxygen	1/Quarter	1	0	03/01/2010
June 2010	00530	Total Suspended Solids	1/Quarter	1	0	06/01/2010
June 2010	00610	Nitrogen, Ammonia (NH3-N)	1/Quarter	1	0	06/01/2010
June 2010	31616	Fecal Coliform	1/Quarter	1	0	06/01/2010
June 2010	80082	CBOD 5 day	1/Quarter	1	0	06/01/2010
June 2010	00400	pH	1/Quarter	1	0	06/01/2010
June 2010	00300	Dissolved Oxygen	1/Quarter	1	0	06/01/2010

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Please inform this office in writing, within 7 days of the receipt of this correspondence, as to why the WWTP was not operating properly. Proper operation and maintenance practices need to be implemented, which will enable the WWTP to continuously meet its NPDES Permit effluent limits.

Also, the currently effective NPDES permit requires the WWTP be under the operation of a Class I licensed wastewater operator. Please inform this office as to who the licensed operator is for this WWTP.

If there are questions or comments regarding the contents of this letter, please contact this office.

Respectfully,



Charles E. Allen  
Environmental Engineer  
Division of Surface Water

CEA:bo

pc: Lorain County Health Department, Attn: John Sabo

SP/Lorain/ColumbiaTwp/TheActivityCenter