



**Environmental
Protection Agency**

Rep. Jim Hotel, Governor
Lt. Governor
Chris Korleski, Director

May 20, 2010

RE: PHEASANT RUN WWTP
PERMIT NO. 3PW00001
LORAIN COUNTY
LAGRANGE TOWNSHIP

Mr. Keith Paul, General Manager
Pheasant Run Association
200 East Lake Drive
P.O. Box 522
Lagrange, Ohio 44050

Dear Mr. Paul:

On April 22, 2010, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Ms. Christina Douglas from Uni-tech Environmental Services Inc. The purpose of the inspection was to: (1) evaluate the waste water treatment system along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. A transducer in the disk filter system malfunctioned. Ms Douglas indicated that the transducer reads the level of water in the disk filter tanks. When the transducer malfunctioned, it caused the system to go into constant backwash mode. The backwash discharges into the flow equalization tank which overflowed. See Figure 1. This area needs to be cleaned up immediately. Ms. Douglas indicated that this was the cause of the February and March 2010 total suspended solids violations.
2. A disk filter technician inspected the system March 1, 2010. It was determined that two wires were incorrectly installed and the transducer was also installed at the improper depth. The appropriate corrections were made.
3. The disk filter membranes on disk filter # 1 were scheduled to be replaced on April 23, 2010. The filter membranes on disk filter #2 were scheduled to be replaced the following week.
4. A hole was observed in the perimeter wall of the center holding tank located between the two aeration tanks. See Figures 4 & 5. It appears that sludge in the holding tank discharged through this hole and/or the aeration tanks overflowed and flooded the area shown in Figure 2. This area needs to be cleaned up immediately. Additionally, the hole in the wall should be patched.

5. Currently the sludge which has overflowed the tanks is being cleaned up manually and stored in a pile as shown in Figure 3. This sludge needs to be cleaned up immediately and properly disposed of at a licensed landfill. Motorized equipment is recommended to clean up the sludge due to the amount of sludge required to be cleaned up. After all of the sludge is cleaned up, it is recommended that the area surrounding the tanks be brought up to grade.
6. You have recently contacted the Army Corp of Engineers concerning the placement of busted up cement along the stream bank. Ms Douglas indicated that the Army Corp of Engineers confirmed that a permit was required.
7. You also recently contacted Mr. Jon VanDommelen from our Central Office to inquire about the results of the Hydraulic Study performed at your facility last year. Please notify this office upon your receipt of the results of the study.
8. Currently, Pheasant Run is undecided if they are going to pursue straightening the receiving stream downstream of the discharge point to allow better flow. The Army Corp of Engineers should be contacted to discuss permitting issues.
9. The plant design of the wastewater treatment system is 140,000 gpd. However, the loading limits on the facility's NPDES permit were calculated using 100,000 gpd since there was no requested increase in loading of the currently permitted pollutants.
10. The blowers were running and the plant was receiving good aeration.
11. Scum/ solids were floating on top of the settling tank. These solids should be removed on a regular basis.
12. The discharge was visually clear.
13. The chlorine contact tank was scheduled to be cleaned out the last week of April. All wastewater generated in the cleaning process will be returned back to the head of the plant.
14. As per Ohio EPA correspondence dated September 25, 2009, dirt has been dumped immediately downstream of the outfall adjacent to the tributary. The material should be pulled away from the tributary or a silt fence should be installed to prevent sediment from entering the tributary. As of April 12, 2010, the dirt still remains to be moved.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2009 through April 30, 2010 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	7D Conc	2000	4480	9/8/2009
001	31616	Fecal Coliform	7D Conc	2000	6720	10/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.3	2.395	10/22/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.8	1.20058	10/22/2009
001	00530	Total Suspended Solids	30D Conc	12.0	14	1/1/2010
001	00530	Total Suspended Solids	7D Conc	18.0	19.5	1/1/2010
001	00530	Total Suspended Solids	30D Qty	4.5	5.67561	1/1/2010
001	00530	Total Suspended Solids	7D Conc	18.0	26.5	1/15/2010
001	00530	Total Suspended Solids	7D Qty	6.8	13.1282	1/15/2010
001	00530	Total Suspended Solids	30D Conc	12.0	14.625	2/1/2010
001	00530	Total Suspended Solids	30D Qty	4.5	7.32398	2/1/2010
001	00530	Total Suspended Solids	7D Conc	18.0	32.5	2/22/2010
001	00530	Total Suspended Solids	7D Qty	6.8	23.5805	2/22/2010
001	00530	Total Suspended Solids	7D Conc	18.0	39.5	3/1/2010
001	00530	Total Suspended Solids	30D Qty	4.5	6.10436	3/1/2010
001	00530	Total Suspended Solids	7D Qty	6.8	22.5529	3/1/2010

No frequency or code violations were noted.

Please note that the following changes have been made in the facility's draft NPDES permit:

1. Composite sampling must be performed with an automatic sampler. All facilities larger than 100,000 gallons per day (gpd) should use automatic samplers at the effluent to collect 24-hour flow proportioned composite samples.
2. Some parameters and monitoring frequencies at upstream monitoring station 3PW000011801 and downstream monitoring station 3PW0001901 have been changed.
3. Mercury samples are required to be grab samples.
4. The reporting requirements for sludge monitoring station 3PW0001588 have changed.
5. The renewed permit will contain operator certification and staffing requirements.
6. A schedule of compliance was placed in the renewed permit which requires the facility to meet E. Coli limits and phosphorus limits in the final table for monitoring station 3PW00011001.
7. A new sanitary sewer overflow reporting station, 3PW00001300, has been added to the permit.

Mr. Keith Paul
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May 21, 2010
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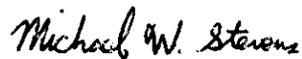
During the public notice period you will have 30 days to evaluate this permit and comment in writing any concerns you may have.

Please notify this office in writing within 14 days receipt of this letter your intentions to resolve items 1, 4, 5, and 14. This letter shall include a completion date for each item. A follow-up inspection will be conducted subsequent to the final completion date.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt



Figure 1

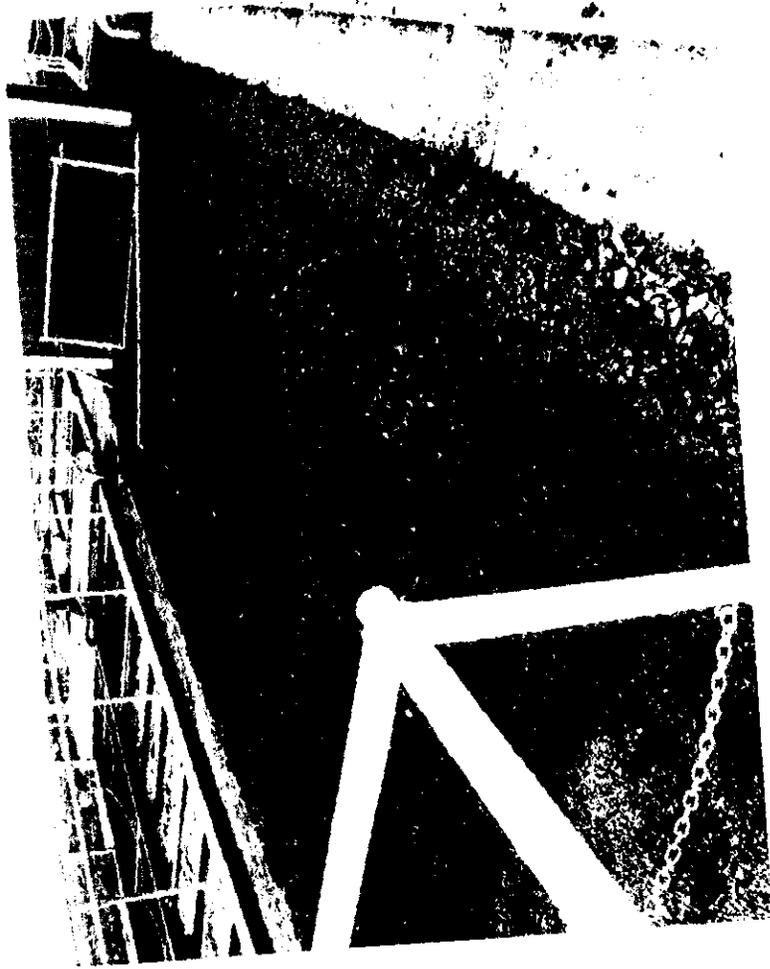


Figure 2



Figure 3



Figure 4



Figure 5