

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

October 31, 2011

RE: GEAUGA COUNTY
CLARIDON TWP
CLARIDON PLAZA
NPDES PERMIT #3PR00295

Mr. Peter Mowad
1042 Main Street
Aliquippa, Pennsylvania 14001

Dear Mr. Mowad:

On October 20, 2011, this writer along with Dave Sage of the Geauga County Health Department, conducted an inspection of the sewage treatment plant serving the above referenced facility. The intent of the inspection was to address a request to add a new food service operation tenant to your building. The inspection assessed the operations and maintenance of the treatment system and review compliance with the National Pollutant Discharge Elimination System (NPDES) permit issued to your facility.

According to Agency records, the wastewater treatment system was installed under Ohio EPA PTI 02-9087, which was effective June 9, 1995. The wastewater system consists of a 1000-gallon sludge holding tank, sludge 112 square foot sludge drying beds, 500-gallon trash trap, 2100-gallon flow equalization tank, 11,000-gallon extended aeration unit, 335-gallon dosing chamber, 356 square feet surf ace sand filters, chlorine disinfection and a 500-gallon scum holding tank with supernatant recirculation to the flow equalization tank. Upgrades to the system included moving the sludge drying beds (installed under Ohio EPA PTI 02-15235 effective date January 11, 2002) and a holding tank for a beauty salon tenant (installed under Ohio EPA PTI 657112 effective date July 21, 2008).

The wastewater treatment plant (WWTP) discharges to a road side ditch tributary to the Butternut Creek which flows into the West Branch of the Cuyahoga River.

NPDES PERMIT COMPLIANCE

A summary of the wastewater treatment plant monitoring and reporting violations for the period of January 1, 2008, through September 1, 2011, has been attached to this letter. There are frequency violations reported during this review period. Please note, any reporting errors or electronic Discharge Monitoring Report (eDMR) errors must be reported to this office so the error may be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

The WWTP is currently classified by the Ohio EPA as a Class 1 wastewater treatment works. This classification is located in the NPDES permit which had an effective date of December 1, 2007. As such, the facility is required to obtain the services of a Class 1 state certified operator. If you have obtained an operator, please provide the operator name and license.

Updated operator and plant certification rules have gone in effect and are found in OAC 3745-7-04. These regulations provide the plant classification rankings and operator staffing requirements. The minimum staffing requirements for a Class I facility is three (3) days per

week for a minimum of one and one-half(1.5) hours per week and a Class A facility is two (2) days per week for a minimum of one (1) hour per week. According to OAC 3745-7-04, the WWTP will be classified a Class A facility upon permit renewal. Please be aware, the owner has an opportunity to obtain a Class A license and operate the system. More information on obtaining a Class A license can be found at <http://www.epa.ohio.gov/dsw/opcert/opcert.aspx>.

A review of eDMR data shows the average flow for the past three (3) years has been around 900 gpd. The NPDES permitted average daily design flow for this facility is 4100 gpd. It appears the treatment plant is operating within design capacity a majority of the time. As such, the system is hydraulically capable of handling added flow from a new tenant. The inspection revealed some maintenance issues that must be resolved.

INSPECTION SUMMARY

Below are the findings and recommendations from the inspection:

The trash traps and sludge holding tank were full at the time of the inspection. Please inform this office when solids were most recently removed from the system.

The mechanical controls at the plant were not working at the time of the inspection (this includes the pump and blower controls). The controls must be in operation at all times at the plant.

The flow equalization tank was full at the time of the inspection and a septic odor appeared to be near the tank. The blowers were not running and there was no air provided to the tank. The flow equalization tank appeared to have septic conditions present. The blowers must be turned on immediately. The tank must be provided with air to prevent septic conditions from developing.

The extended aeration plant was in operation and both blowers were in operation at the time and appeared to be providing a satisfactory air supply to the aeration tank. The contents of the aeration portion of the plant were a light brown color and the tank was provided with adequate rollover. The sludge return lines were in operation and returning light gray colored solids to the aeration portion of the plant. The clarifier appeared cloudy and contained some scum. It appears the system is not recirculating solids from the clarifier. The clarifier sidewalls should be scraped down periodically to maintain an adequate amount of solids circulating in the system. The effluent weir contained some vegetation and solids accumulation. The skimmer was not visible at the time of the inspection. The effluent trough was set above the liquid level of the tank and there was no effluent visually observed going through the weirs. Please ensure the weirs are level to avoid short circuiting in the tank.

The dosing chamber was not in operation and the pump controls were not operational. The sand filter beds had accumulation of solids along with some vegetation. There was debris located in the beds which must be removed. The chlorination system was provided with chlorine tablets but there were no dechlorination tablets provided. The NPDES permit for your facility contains chlorine and fecal limits which require disinfection and subsequent dechlorination from April 1 to October 31 every year. Failure to provide proper treatment puts the facility at risk of violating the NPDES permit.

The final outfall was inspected and appeared to be clear. A dye test was conducted to locate the actual outfall pipe. The result of the test showed the effluent coming from underneath the

existing PVC pipe. The dye dispersal appeared to be from a buried pipe or a cracked effluent pipe. This office is concerned with the integrity and actual location of the discharge pipe. Please provide information to this office regarding the actual location of the discharge pipe and whether there are any cracks in the pipe itself. The final effluent was clear and the receiving stream appeared to be in satisfactory condition.

The NPDES permit for this facility expires November 30, 2012. The renewal application for the NPDES permit is required to be submitted 180 days prior to the permit expiration date.

IN SUMMARY

The following items are of concern to this office and must be addressed:

1. No later than November 11, 2011, complete all necessary repairs to the flow equalization tank blowers and have the units online. Provide notification to this office regarding the status of the blowers.
2. Have the trash trap and sludge holding tank pumped out no later than November 14, 2011. Provide notification to this office regarding the date of solids removal from the system.

If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

cc: Geauga County Health Department: Attn: Dave Sage

File: Semi-Public/Gauga/Claridon Twp/3PR00295

Violation Summary:

Discharge Violations

<u>Reporting Period</u>	<u>Station</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
April 2008	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	6.595	4/1/2008
April 2008	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	13.1	4/1/2008
July 2009	001	Total Suspended Solids	30D Conc	12	16.5	7/1/2009
November 2009	001	Total Suspended Solids	7D Conc	18	24	11/1/2009
January 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.33	1/1/2011
May 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.445	5/1/2011

Frequency Violations

Reporting Period	Station	Parameter	Sample			Violation Date
			Frequency	Expected	Reported	
July 2010	001	Flow Rate	1/Day	1	0	07/02/2010
July 2010	001	Flow Rate	1/Day	1	0	07/04/2010
July 2010	001	Flow Rate	1/Day	1	0	07/07/2010
July 2010	001	Flow Rate	1/Day	1	0	07/16/2010
July 2010	001	Flow Rate	1/Day	1	0	07/17/2010
July 2010	001	Flow Rate	1/Day	1	0	07/20/2010
July 2010	001	Flow Rate	1/Day	1	0	07/23/2010
July 2010	001	Flow Rate	1/Day	1	0	07/24/2010
July 2010	001	Flow Rate	1/Day	1	0	07/27/2010
July 2010	001	Flow Rate	1/Day	1	0	07/30/2010
July 2010	001	Flow Rate	1/Day	1	0	07/31/2010
January 2011	001	Flow Rate	1/Day	1	0	01/01/2011
January 2011	001	Flow Rate	1/Day	1	0	01/02/2011
January 2011	001	Flow Rate	1/Day	1	0	01/05/2011
January 2011	001	Flow Rate	1/Day	1	0	01/06/2011
January 2011	001	Flow Rate	1/Day	1	0	01/12/2011
January 2011	001	Flow Rate	1/Day	1	0	01/14/2011
January 2011	001	Flow Rate	1/Day	1	0	01/16/2011
January 2011	001	Flow Rate	1/Day	1	0	01/19/2011
January 2011	001	Flow Rate	1/Day	1	0	01/20/2011
January 2011	001	Flow Rate	1/Day	1	0	01/23/2011
January 2011	001	Flow Rate	1/Day	1	0	01/24/2011
January 2011	001	Flow Rate	1/Day	1	0	01/25/2011
January 2011	001	Flow Rate	1/Day	1	0	01/28/2011
July 2010	001	Flow Rate	1/Day	1	0	07/06/2010
July 2010	001	Flow Rate	1/Day	1	0	07/25/2010
January 2011	001	Flow Rate	1/Day	1	0	01/09/2011
January 2011	001	Flow Rate	1/Day	1	0	01/10/2011
January 2011	001	Flow Rate	1/Day	1	0	01/18/2011
July 2010	001	Flow Rate	1/Day	1	0	07/05/2010
July 2010	001	Flow Rate	1/Day	1	0	07/09/2010
July 2010	001	Flow Rate	1/Day	1	0	07/22/2010
July 2010	001	Flow Rate	1/Day	1	0	07/28/2010
January 2011	001	Flow Rate	1/Day	1	0	01/08/2011
January 2011	001	Flow Rate	1/Day	1	0	01/11/2011
January 2011	001	Flow Rate	1/Day	1	0	01/26/2011
April 2009	001	Flow Rate	1/Day	1	0	04/30/2009
July 2010	001	Flow Rate	1/Day	1	0	07/01/2010
July 2010	001	Flow Rate	1/Day	1	0	07/10/2010
July 2010	001	Flow Rate	1/Day	1	0	07/18/2010
January 2011	001	Flow Rate	1/Day	1	0	01/04/2011
January 2011	001	Flow Rate	1/Day	1	0	01/21/2011
January 2011	001	Flow Rate	1/Day	1	0	01/22/2011
July 2010	001	Flow Rate	1/Day	1	0	07/03/2010
July 2010	001	Flow Rate	1/Day	1	0	07/08/2010
July 2010	001	Flow Rate	1/Day	1	0	07/12/2010
July 2010	001	Flow Rate	1/Day	1	0	07/15/2010
July 2010	001	Flow Rate	1/Day	1	0	07/21/2010
July 2010	001	Flow Rate	1/Day	1	0	07/26/2010
January 2011	001	Flow Rate	1/Day	1	0	01/07/2011
January 2011	001	Flow Rate	1/Day	1	0	01/13/2011
January 2011	001	Flow Rate	1/Day	1	0	01/30/2011
July 2010	001	Flow Rate	1/Day	1	0	07/11/2010
July 2010	001	Flow Rate	1/Day	1	0	07/13/2010
July 2010	001	Flow Rate	1/Day	1	0	07/14/2010
July 2010	001	Flow Rate	1/Day	1	0	07/19/2010
July 2010	001	Flow Rate	1/Day	1	0	07/29/2010
January 2011	001	Flow Rate	1/Day	1	0	01/03/2011
January 2011	001	Flow Rate	1/Day	1	0	01/15/2011
January 2011	001	Flow Rate	1/Day	1	0	01/17/2011
January 2011	001	Flow Rate	1/Day	1	0	01/27/2011
January 2011	001	Flow Rate	1/Day	1	0	01/29/2011
January 2011	001	Flow Rate	1/Day	1	0	01/31/2011