



**Environmental  
Protection Agency**

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

March 15, 2012

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

William Rackus, DDS, Owner  
Willo Hill Professional Building  
35005 Chardon Road  
Willoughby Hills, OH 44094

Dear Dr. Rackus:

On March 7, 2012, 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. The plant's operator-of-record (ORC), Mr. Eugene Davis accompanied this writer during the inspection.

Plant Observations/Discussions

At the time of inspection, the plant effluent was clear with no evidence of foam, debris, oil or grease. The plant discharges to a storm sewer manhole located onsite, east of the plant.

The following observations/discussions were noted:

1. The extended aeration plant was operating in a satisfactory manner. The aeration tank mixed liquor was brown in color, indicating a balanced system. Mr. Davis has performed a considerable amount of operation and maintenance work on the plant. Some of the new installations at the plant include new belts provided for the aeration blowers, and a new down pipe, diffusers and lateral pipes installed in the aeration tank.
2. Rehabilitation of the filter beds has been performed by Mr. Davis including work on the underdrains, the replacement of gravel, and the addition of Ohio EPA approval filter sand .
3. Mr. Davis has stated his intent to re-grade the plant grounds to prevent storm water drainage from entering the plant and to build up the filter bed walls. This work is expected to be performed in the spring of this year. Additional work is anticipated at a later date including the installation of a new filter distribution box, relocation of the blowers, new covers for the blowers, reconfiguring the chlorine contact chamber inlet and outlet piping, and repair of the fencing around the plant.
4. A dechlorinator has been purchased and will be installed by May 1<sup>st</sup>, the start of disinfection season.
5. The O & M records are currently located inside your office. Mr. Davis is exploring the possibility of relocating the logbook in the hallway area of the building by the doorway near the plant.
6. Mr. Davis and Mr. Donald Roberts became the Operators-of-Record for the facility on April 18, 2011.

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A review of the plant's Discharge Monitoring Reports (DMR) revealed the following effluent limitation violations during the period of March 2011 through January 2012:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	.25	6/15/2011

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.

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/cs