



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 30, 2012

RE: CUYAHOGA COUNTY
CITY OF PEPPER PIKE
PEPPER PIKE CLUB
NPDES PERMIT OH0126331
OHIO EPA PERMIT NO. 3PR00215

Mr. William M. Heffernan, General Manager
Pepper Pike Club
2800 S.O.M. Center Road
Pepper Pike, OH 44124

Dear Mr. Heffernan:

On March 14, 2012, this office conducted an inspection of the wastewater treatment plant (WWTP) serving the Pepper Pike Club. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

Facility Description

The NPDES permit, with an effective date of March 1, 2010 and expiration date of February 28, 2015, authorizes an average daily discharge of 0.024 MGD to the unnamed tributary of the Chagrin River. The WWTP consists of a trash trap, manual bar screen, dual-unit extended aeration package plant, dosing chamber, dual-unit surface sand filter, chlorination/dechlorination tank, sludge holding tank, and sludge drying beds. Due to low-flow conditions, only one-half of the aeration system is normally required for treatment.

We understand that the WWTP is maintained under a service agreement with Ake Environmental Services. The agreement also includes submission of the monthly Discharge Monitoring Reports (DMRs).

Inspection Findings/Compliance Status

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

1. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. A visual observation of the plant effluent revealed no signs of floating debris, oil & grease, or foam in the discharge.



2. Please ensure that some riprap is installed around the splash pads of the surface sand filters.
3. Certain sections of metal grating are in need of replacement. Please ensure that all metal grating over the treatment components are structurally sound.
4. Sections of the block "retaining walls" around the aeration tanks need to be re-mortared.
5. The plant's O&M logbook is currently located inside an unlocked mailbox. The mailbox should either be locked or relocated within the fenced plant area.



6. A concern was noted with respect to management of soil stockpiles on the property. Appropriate Best Management Practices (BMPs), e.g. silt fencing, should be implemented to minimize pollutant runoff from these sites.



A review of the monthly DMR received by Ohio EPA for the period, January 2010 – January 2012, indicates the following effluent violations have occurred:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2010	001	Dissolved Oxygen	1D Conc	6.0	5.9	5/5/2010
July 2010	001	Dissolved Oxygen	1D Conc	6.0	5.3	7/28/2010
July 2011	001	Dissolved Oxygen	1D Conc	6.0	3.5	7/20/2011

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The review also noted numerous events that were reported as or similar to:

"AH - FACILITY PERSONNEL DID NOT RECORD READING"

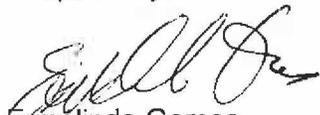
Failure to monitor required parameters constitutes a violation of the permit.

Within 10 days of the date of this letter, please provide this office with written notification as to the actions taken or proposed to correct the violations and/or deficiencies cited above. Your response must include dates for completion of the actions presented in your response.

Please be advised that past or current violations of the terms and conditions of the NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code (ORC). Such actions can result in fines of up to \$10,000 per day of violation.

If you should have any questions, please contact this office at (330) 963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/cs

cc: Steve Howe, AKE Laboratory, Inc.