



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

December 6, 2012

RE: CUYAHOGA COUNTY  
CITY OF PEPPER PIKE  
THE COUNTRY CLUB, INC.  
NPDES PERMIT NO. OH0044725  
OHIO EPA PERMIT NO. 3PR00052

Mr. Robert Josey, General Manager  
The Country Club, Inc.  
2825 Lander Road  
Pepper Pike, OH 44124

Dear Mr. Josey:

An inspection of the wastewater treatment plant (WWTP) serving the referenced facility was conducted by the undersigned on November 8, 2012. In addition to you and Terry Lisewski, also present was Steve Howe and Nicole Dalton of Ake Laboratories. The purpose of the inspection was to evaluate the facility's compliance with respect to the terms and conditions of the referenced National Pollutant Discharge Elimination System (NPDES) discharge permit. Specific emphasis was placed on the Operator of Record (ORC) and recordkeeping requirements of the permit.

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

#### **Facility Description**

The current NPDES permit authorizes an average daily discharge of 0.0245 MGD to the unnamed tributary of the Chagrin River. The WWTP consists of a trash trap, extended aeration package plant with a clarifier, dosing chamber, a surface sand filter, chlorination/dechlorination, and an aerated sludge holding tank. Flow rate is monitored using a continuous flow meter.

#### **Inspection Findings/Compliance Status**

At the time of the inspection the following items were noted and discussed with you:

1. The facility appeared to be recovering well from the effects of Hurricane Sandy. We understand that the plant area became inundated with water for a period of time due to loss of power. While there was significant solids deposition on one of the surface sand filters as a result of the outage, the plant effluent appeared to be of satisfactory visual quality.



2. Part II of your NPDES permit indicates that the treatment system is classified as a Class A facility. According to OAC 3745-7-04, the minimum ORC staffing requirement for a Class A facility is two days per week for a minimum of 1.0 hours per week. The inspection confirmed that the facility's contract with AKE only specified once/week site visits (30 minutes). As such, the facility is in violation of OAC 3745-7-04 for not meeting the minimum staffing hour requirements.
3. The inspection revealed that all record entries required pursuant to your National Pollutant Discharge Elimination System (NPDES) permit and/or OAC 3745-7-09 are not being properly maintained at the facility. Aside from flow rate, the facility logbook did not include any daily operation and maintenance record entries from Country Club maintenance staff. The following information shall be recorded:
  - Date and time of arrival and departure of any staff;
  - Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed, or effluent produced;
  - Results of tests performed and samples taken, unless documented on a laboratory sheet;
  - Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, or effluent produced; and
  - Identification of the persons making entries.

4. In addition to the signed DMRs, the facility must have copies of all accompanying laboratory reports on site. At a minimum, these **certified** reports shall include the following information:

- The exact place and date of sampling;
- The person(s) who performed the sampling or measurements;
- Chain of Custody information;
- The date the analyses were performed on those samples;
- The person(s) who performed the analyses;
- The analytical techniques or methods used; and
- The results of all analyses and measurements.

A review of the DMRs received by Ohio EPA for the period, October 2011 – October 2012, was conducted. The review indicates violations of the terms and conditions of the NPDES permit. The specific violations are as follows:

Station	Parameter	Units	Date	A Code	Comments
001	Flow Rate	GPD	12/7/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Flow Rate	GPD	12/9/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/2/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/5/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/6/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/7/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/9/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/12/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/13/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/14/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/16/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/19/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/20/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/21/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/23/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/27/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/28/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	12/30/2011	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/3/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/4/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/6/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/9/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/10/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/11/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/13/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/16/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/17/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/20/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/23/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/24/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Color, Severity	Units	1/25/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING





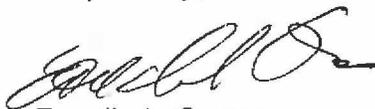


Station	Parameter	Units	Date	A Code	Comments
001	Turbidity, Severity	Units	8/14/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/15/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/17/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/20/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/21/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/22/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/24/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/27/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/28/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/29/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	8/31/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/4/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/5/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/7/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/10/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/11/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/12/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/14/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/17/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/19/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/21/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/24/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/25/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/26/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
001	Turbidity, Severity	Units	9/28/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING

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. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violations and/or deficiencies. Your response shall include specific dates for completion of the actions.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes  
 Environmental Engineer  
 Division of Surface Water

EG/cs

File: SemiPublic/Cuyahoga County/Pepper Pike