



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

December 7, 2012

RE: CUYAHOGA COUNTY  
VILLAGE OF GATES MILLS  
CHAGRIN VALLEY HUNT CLUB  
NPDES PERMIT No. OH0045063  
OHIO EPA PERMIT NO. 3PR00175

James Misencik, Club Manager  
Chagrin Valley Hunt Club  
P. O. Box 159  
Gates Mills, OH 44040

Dear Mr. Misencik:

An inspection of the wastewater treatment plant (WWTP) serving the above referenced facility was conducted by this office on November 8, 2012. A tour of the WWTP was provided by Messrs. Jim Schremp and Joe Polzner. The purpose of the inspection was to obtain and review information in anticipation of renewal of the facility's National Pollutant Discharge Elimination System (NPDES) discharge permit. During the course of the inspection, evaluations were conducted of the treatment processes, effluent discharge quality, laboratory testing protocols, and biosolids management.

#### **Facility Description**

The current NPDES permit authorizes an average daily discharge of 0.0092 MGD of treated wastewater to the Chagrin River. The WWTP consists of an influent lift station, flow equalization basin, dual-unit sequencing batch reactors (SBRs), tertiary sand filter, UV disinfection, and an aerated sludge holding tank.

The NPDES permit will expire on January 31, 2013. Receipt of a timely renewal application on July 16, 2012 authorizes the facility to discharge beyond the date of expiration. Information obtained during the inspection will be utilized during the review and issuance of the renewal permit

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

At the time of the inspection the following items were noted:

1. All treatment components were in service and appeared to be functioning properly. A visual observation of the plant effluent revealed no signs of floating debris, oil & grease, or foam in the discharge.
2. Fixed access ladders to the above-grade SBRs had been installed. Additionally, a guardrail was installed on top of the tanks; **a toe plate and mid-rail must also be added.**



3. We understand that the WWTP continues to be maintained under a service agreement with AKE Laboratory. The agreement also includes laboratory services and submission of the monthly Discharge Monitoring Reports (DMRs).
4. We understand that pH measurements are performed onsite by plant staff. Please ensure that an Operation & Maintenance logbook is maintained for the pH meter.
5. The September 2012 Chain of Custody form indicated the use of a single sample bottle. Please provide confirmation that bacteria and Ammonia samples are being collected in separate containers.
6. 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 monthly discharge monitoring reports (DMR) received by the Ohio EPA for the period September 2011 thru November 2012, indicates violations of the effluent limitations contained in the NPDES permit. The specific instances of non-compliance are as follows:

Chagrin Valley Hunt Club						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2012	001	Dissolved Oxygen	1D Conc	6.0	4.1	5/4/2012
June 2012	001	Dissolved Oxygen	1D Conc	6.0	5.8	6/22/2012
July 2012	001	Dissolved Oxygen	1D Conc	6.0	3.3	7/6/2012

July 2012	001	Dissolved Oxygen	1D Conc	6.0	5.9	7/20/2012
August 2012	001	Dissolved Oxygen	1D Conc	6.0	5.5	8/10/2012
August 2012	001	Dissolved Oxygen	1D Conc	6.0	4.3	8/17/2012
August 2012	001	Dissolved Oxygen	1D Conc	6.0	5.8	8/31/2012
October 2012	001	Total Suspended Solids	30D Conc	12	20.	10/1/2012
October 2012	001	Total Suspended Solids	7D Conc	18	20.	10/1/2012

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. 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 violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

#### **Anticipated NPDES Permit Changes**

Based on recent rule revisions and/or policy guidance, the following changes will be incorporated into the renewal permit:

- The facility will be re-classified as a Class A treatment works in accordance with Ohio Administrative Code (OAC) 3745-7.
- As of March 15, 2010, the current Fecal Coliform water quality standard was replaced by an *E. coli* standard. Based on the new Class A Primary Contact Recreation standard, the projected *E. coli* effluent limitations for the facility will be 126/100 ml (30-day average) and 284/100 ml (7-day average).
- Monitoring for Color, Severity and Odor, Severity will be discontinued.

#### **Summary/Conclusion**

Based on the inspection findings and the facility's overall compliance record, this office anticipates drafting and public-noticing the renewal permit for public review and comment. Comments received during the public-notice period will be considered by Ohio EPA prior to issuance of a final permit.

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.

File: SemiPublic/Cuyahoga County/Gates Mills/Chagrin Valley Hunt Club