



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

January 14, 2013

SUMMIT COUNTY
VILLAGE OF RICHFIELD
RICHFIELD HILLS WWTP
OHIO EPA PERMIT NO. 3PH00003
COMPLIANCE EVALUATION INSPECTION

CERTIFIED MAIL

Mr. Randy Kertesz, President
3439 W. Brainard Road
Suite 260
Woodmere, OH 44122

Dear Mr. Kertesz:

On January 10, 2013, a Compliance Evaluation Inspection (CEI) was conducted at the Richfield Hills wastewater treatment plant (WWTP). The existing 130,000 gpd extended aeration treatment plant consists of a manual bar screen, comminutor, extended aeration plant, settling/clarification, rapid sand filters (which are being utilized as slow surface sand filters), chlorination/dechlorination, post aeration, aerated sludge holding tank, and sludge drying beds.

During the inspection, the following observations were noted:

- The comminutor appears to have been removed from the WWTP. Because the aeration tank contained many large solids including rags, sanitary products, etc., are there plans to place the comminutor back into service? Furthermore, the manual bar screen needs cleaning.
- The aeration tank was receiving the proper amount of air. But, the color of the mixed liquor in the aeration tank appeared to be dark in color, and there was quite a bit of dark foam present. Mr. Steve Howe of AKE Environmental has previously stated that the darker color is normal for this plant. However, this office feels that solids should be wasted more often from the plant.
- The weir troughs in the clarifier were full of solids. It's understood that this is a normal occurrence at this plant. This office recommends this problem be remedied and/or the solids be removed on a more frequent basis. Otherwise, there is a good chance of solids overflowing the clarifier weirs.
- It's understood that the rapid sand filters are still being utilized as slow sand filters. Your current NPDES permit contains a Compliance Schedule to modify or replace the sand filters. A Permit-to-Install (PTI) application along with detail engineering plans, stamped by a Professional Engineer, were to be submitted to this office by May 1, 2011. To my knowledge, no PTI has been submitted. When should this office expect the required PTI submittal?
- The sludge drying beds are not being utilized. It's understood liquid sludge is hauled to the City of Bedford Heights WWTP, in accordance with your sludge management plan.
- The blower building contained the required hardbound logbook, detailing the daily operations at the plant.

- During a past inspection in February 2010, it was understood that the composite sampler took a sample every hour. But, the composite sampler is required to be flow proportioned, rather than time proportioned. Have the necessary sampler modifications been made?
- The access drive to the WWTP is in very poor condition. For the safety of your operators, it is strongly recommended that repairs/replacement of this driveway take place as soon as possible.

Upon review of the electronic Discharge Monitoring Reports (eDMR's) submitted for the plant from January 2012 through January 2013, the following effluent violations were noted:

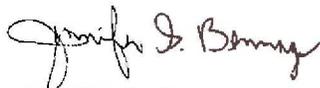
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	4.0	4.07	1/1/2012
January 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	6.0	7.8	1/22/2012
May 2012	001	E. coli	7D Conc	362	700.	5/1/2012
May 2012	001	E. coli	7D Conc	362	430.	5/8/2012
May 2012	001	Dissolved Oxygen	1D Conc	6.0	5.7	5/11/2012
August 2012	001	E. coli	7D Conc	362	516.	8/8/2012
September 2012	001	Total Suspended Solids	7D Conc	18	19.	9/22/2012
October 2012	001	Total Suspended Solids	7D Conc	18	20.5	10/15/2012
November 2012	001	Total Suspended Solids	7D Conc	18	20.	11/15/2012

Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111.

In conclusion, although the effluent violations have lessened than in past years, this office is still concerned with the plant's appearance. However, more frequent wasting of solids and new sand filters will be beneficial.

This office looks forward to receiving a written response to my questions contained in this letter. Also, it is requested that your technical operator, AKE Environmental, provide written explanations for the effluent violations and the plan of action to obtain compliance. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water

JSB/cs

cc: Mr. Steve Howe, AKE Environmental
Greg Dewhurst, PUCO
Jim Wing, PUCO
Mayor, Village of Richfield

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PS Form 3800, August 2006 See Reverse for Instructions

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