



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

February 8, 2013

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

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

Dear Mr. Heffernan:

This letter is a follow-up to our meeting and inspection of the wastewater treatment plant (WWTP) serving the Pepper Pike Club on January 10, 2013. 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. Specific emphasis was placed on the recordkeeping requirements of the 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 used for treatment.

The WWTP is maintained under a service agreement with Ake Environmental & Construction Services, Inc.

Inspection Findings/Compliance Status

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

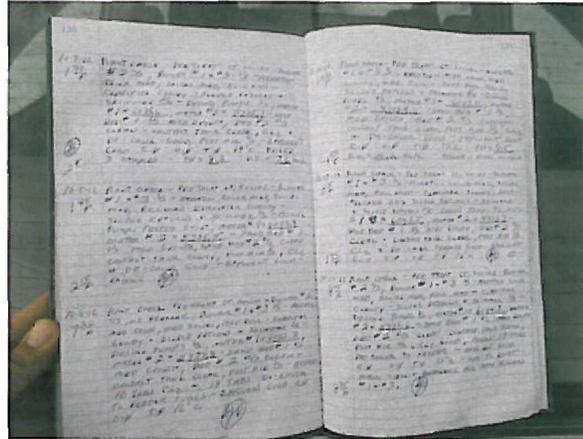
1. The overall operational performance of the treatment processes appeared to be satisfactory. Due to weather conditions, direct access to the plant outfall was not possible. Nonetheless, a visual observation of the plant effluent (at the chlorine contact tank) revealed no signs of floating debris, oil & grease, or foam in the discharge.



2. Certain sections of rusted metal grating are still in need of replacement. Please ensure that all metal grating over the treatment components are structurally sound. Additionally, one of the blowers was out of service.

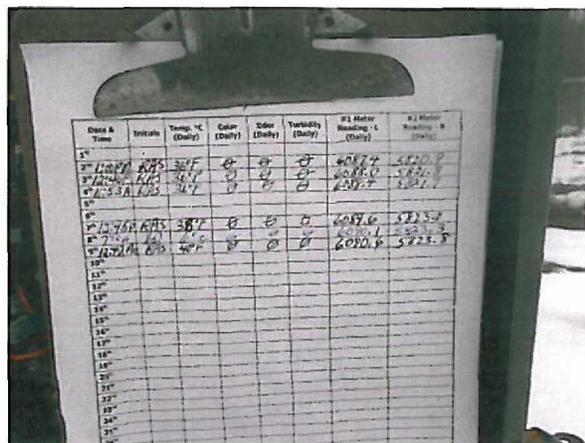


3. The plant's O&M logbook is **still** located inside an unsecured mailbox. The mailbox should either be locked or relocated within the fenced plant area. In addition to Ake personnel, the facility logbook should include any daily operation and maintenance record entries from maintenance staff.



4. The daily flow rates noted in the facility's log records do **not** match the calculated results that have been reported to Ohio EPA. Based on documentation you submitted to Ohio EPA in 2010, flow from the elapsed time meters were to be based on a pump rate of 100 gpm **times** the pump run time. It would appear that the flow data submitted since 2010 have failed to account for the pump run time. By way of example, a pump running for a total period of one-half hour (or 30 minutes) per day equates to a flowrate of 3,000 gallons/day. **Once the pump flowrates have been reconfirmed, all DMRs for this period must be revised and resubmitted as expeditiously as practicable.**

5. Temperature entries on plant log sheets are generally recorded by staff in "degrees Fahrenheit" even though the form clearly requires reporting to be in "degrees Celsius". Please ensure that this situation is corrected by either replacing the thermometer or providing a conversion chart for staff to utilize.



In addition to the above, the review of the monthly discharge monitoring reports (DMR) received by Ohio EPA for the period, February 2012 – January 2013, indicates that the following flow reporting violations have **not** been corrected:

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Station	Parameter	Units	Date	A Code	Comments
1	Flow Rate	MGD	1/1/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/2/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/7/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/8/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/14/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/15/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/21/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/22/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/28/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	1/29/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/4/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/5/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/11/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/12/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/19/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/21/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/25/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	2/26/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/3/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/4/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/10/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/11/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/17/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/24/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/25/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/27/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	3/31/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/1/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/7/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/8/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/15/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/21/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/22/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/28/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	4/29/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	5/6/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	5/8/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	5/13/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	5/20/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	5/27/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	6/3/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	6/10/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING

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Station	Parameter	Units	Date	A Code	Comments
1	Flow Rate	MGD	6/17/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	6/24/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	7/1/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	7/8/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	7/12/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	7/15/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	7/22/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	7/29/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	8/5/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	8/12/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	8/14/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	8/19/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	8/26/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/3/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/8/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/9/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/13/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/16/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/20/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/22/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/23/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	9/30/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	10/7/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	10/14/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	10/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	10/20/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
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1	Flow Rate	MGD	10/27/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	10/28/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	10/30/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/1/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/3/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/4/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/8/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/11/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/17/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING
1	Flow Rate	MGD	11/18/2012	AH	FACILITY PERSONNEL DID NOT RECORD READING

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.

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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,

A handwritten signature in black ink, appearing to read "Ermelindo Gomes".

Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/cs

cc: Ake Environmental & Construction Services, Inc.