



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director  
February 19, 2013

RE: SUMMIT COUNTY  
CITY OF NEW FRANKLIN  
FRANKLIN ADMIN BLDG & FIRE STA.  
5611 MANCHESTER ROAD  
PRE-PERMIT INSPECTION/NOTICE OF VIOLATION  
NPDES NO. 3PR00338

Mr. Al Bollas, Mayor  
Franklin Administration Bldg & Fire Station  
5611 Manchester Road  
Akron, OH 44319

Dear Mayor Bollas:

On February 13, 2013, a Pre-Permit Inspection was conducted at the above referenced wastewater treatment plant (WWTP). According to our files, the existing wastewater treatment system consists of a 500-gallon trash trap, a 2,000-gpd extended aeration plant, a dosing chamber, a 308 square foot surface sand filter, a 365-gallon chlorination/dechlorination tank, and a 1,000-gallon aerated sludge holding tank.

During the inspection, the following deficiencies were noted:

1. Although the plant was running and appeared to be receiving adequate air, the mixed liquor in the aeration tank was not the appropriate chocolate brown color and was very odorous.
2. The return line from the clarifier to the aeration tank was clear in color rather than chocolate brown. Also, the clarifier had lots of floating solids. These problems could indicate an inadequate return of sludge; perhaps the clarifier walls need scarped down more frequently. If the sludge is not properly returning to the aeration tank, the old sludge can denitrify and float, rather than settle.
3. The surface sand filters were draining very slowly with lots of black solids. It appears the sand filters need to be cleaned as soon as possible.
4. For safety and liability reasons, either lockable grating should be used over the treatment plant tanks, or a six foot high locked fence should be installed around the plant.

Review of the electronic Discharge Monitoring Reports (eDMRs) reported for your WWTP from January 2012 through January 2013 revealed the following effluent violations:

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2011	Nitrogen, Ammonia (NH3)	30D Conc	2.0	9.72	3/1/2011
March 2011	Nitrogen, Ammonia (NH3)	7D Conc	3.0	9.72	3/15/2011
August 2011	Total Suspended Solids	30D Conc	12	21.	8/1/2011
August 2011	Total Suspended Solids	7D Conc	18	21.	8/15/2011

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December 2011	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.41	12/1/2011
March 2012	Total Suspended Solids	30D Conc	12	14.	3/1/2012
March 2012	Nitrogen, Ammonia (NH3)	30D Conc	2.0	24.3	3/1/2012
March 2012	Nitrogen, Ammonia (NH3)	7D Conc	3.0	24.3	3/1/2012
March 2012	Nitrogen, Ammonia (NH3)	30D Qty	0.02	.05611	3/1/2012
March 2012	Nitrogen, Ammonia (NH3)	7D Qty	0.02	.05611	3/1/2012
December 2012	Total Suspended Solids	30D Conc	12	16.	12/1/2012

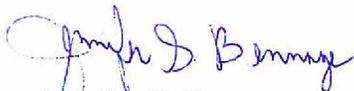
Please be advised such instances of noncompliance are subject to enforcement pursuant to Ohio Revised Code 6111. By March 1, 2013, it is directed your certified WWTP operator provide written explanation for the violations and a plan of action to obtain compliance with your National Pollutant Discharge Elimination System (NPDES) permit.

Your NPDES renewal application form indicates that because of hydraulic issues at your plant, a flow equalization tank may be beneficial. This office could add a compliance schedule to your renewal NPDES permit such as: one year to obtain a Permit-to-Install from Ohio EPA for the plant upgrade; 18 months to finish installation of the tank. Upon review of your flow data though, it does not appear that your plant is undersized. Perhaps the flow is being measured incorrectly, or there truly is a surcharging problem. It is recommended your WWTP operator contact me to discuss the issue as soon as possible.

Another change in your renewal NPDES permit concerns E. coli. A change in the State's Water Quality Standards is replacing the fecal coliform effluent limitation with an E. coli effluent limitation. Please notice that your permit's interim effluent table still contains the fecal coliform limitation and adds E. coli monitoring. The final effluent table includes E. coli effluent limitations. Please notice that the Schedule of Compliance in your permit directs you to submit to this office, seven months after the effective date of the permit, a brief status report on the ability of your existing treatment works to meet the final effluent limit for E. coli.

The Public Notice of the draft NPDES permit will be published in the local newspaper. Once Central Office sends you the draft permit, please read it carefully. If you have any comments or questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage  
Environmental Engineer  
Division of Surface Water

JSB/cs

Cc: Brent Paulus, Summit County Health Dept.  
Denny White, Operator, DGW Services LLC