



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

June 14, 2013

RE: MODERN MANAGEMENT SOLUTIONS  
DBA P AND M ESTATES  
PERMIT NO. 3PX00004  
PORTAGE COUNTY  
WINDHAM TOWNSHIP

Ms. Carol Foster  
General Manager  
9181 State Route 82  
Garrettsville, Ohio 44231

Dear Ms. Foster:

On June 5, 2013, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Eugene Davis, Class III Waste Water Treatment Plant Operator. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. Mr. Eugene Davis from efdavis<sub>2</sub> & ASSOCIATES has been in charge of the technical operations of the wastewater treatment plant since August 2009 and is listed as the Operator of Record. The date of notification on record is August 19, 2009.
2. Mr. Davis is also responsible for collecting the effluent samples and entering the analytical results into Ohio EPA's Surface Water Information Management System and pinning the monthly discharge monitoring report.
3. Portage County Water Resources performs the analysis on the effluent samples.
4. The plant design of the wastewater treatment system is 50,000 gpd.
5. In accordance with Ohio Administrative Code 3745-7-04, the sewage treatment facility is classified as a Class I facility. The classification requires that the Operator of Record be physically present at the treatment works 3 days per week for a minimum of 1.5 hours per week.
6. Ohio operator certification rules require that a field log book be maintained at the treatment plant. The log book should document the time the Operator of Record is present at the treatment works along with maintenance duties being performed at the treatment plant. This requirement is being met. Mr. Davis maintains a log book inside the building adjacent to the ultra violet disinfection system.
7. Mr. Davis indicated that the trash trap is pumped out every three months.
8. The treatment plant was receiving good aeration.
9. The contents of the aeration tanks were medium brown in color and no foam was present. This is typical of a properly operating plant.

10. Both the sludge holding tank and flow equalization tank were also being aerated.
11. No odor was present at the treatment plant.
12. Both skimmers return lines were functioning properly and returning clear water. The skimmer return lines flow into a scum trap and then discharge into the east aeration tank.
13. Both skimmers were set at the proper elevation.
14. Both primary sludge return lines were functioning properly and returning medium brown water.
15. Both secondary sludge return lines were also functioning properly and returning medium brown water.
16. The weirs and launders in the settling tanks were free of solids deposition.
17. A minimal amount of pin floc was present on the surface of the settling tanks.
18. The flow equalization distribution boxes were cracked and showing signs of deterioration. See Figures 1 & 2. This should be repaired or replaced immediately. Replacement of the cement distribution boxes with an aluminum boxes is recommended. However, it is not required.
19. The facility has Hydro Clear Corp. rapid sand filters. Previously the backwash from the rapid sand filters was pumped to two surface sand filter cells which drained back to the raw water pump station building. Mr. Davis indicated that he has not used the surface sand filter beds since October 2009. Currently, the back wash is piped directly back to the raw water pump station building.
20. Mr. Davis indicated that any filter media and sludge removed from the rapid sand filter is placed in the R&R sanitation dumpster. All filter media and sludge should always be disposed at a licensed solid waste landfill.
21. The renovation of the rapid sand filter was completed in November 2012. The backwash was observed and the bed drain down time was less than three minutes
22. The treatment plant is equipped with a single ultra violet disinfection unit comprised of four lights. The system was operating. Disinfection is required from May 1<sup>st</sup> through October 31<sup>st</sup>.
23. Flow is monitored with a Parshall flume.
24. The final effluent being discharged was clear. No impact to the receiving stream was observed.
25. A permanent marker at the outfall was posted per the requirement of Part II, Letter J of the facility's NPDES permit.
26. Three exterior building light fixtures were replaced.
27. The status of the standby generator was not known. The status of the unit needs to be determined and brought up to proper operating conditions if necessary.

This office has recently reviewed your self-monitoring reports covering the period February 1, 2012 through May 31, 2013 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

#### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.545	5/1/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.25	4.12	5/15/2012
001	31648	E. coli	7D Conc	362	1986.3	6/1/2012
001	00530	Total Suspended Solids	7D Conc	18	19.	11/1/2012
001	00300	Dissolved Oxygen	1D Conc	6.0	2.	12/3/2012

#### Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Week	1	0	11/15/2012
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	11/15/2012
001	80082	CBOD 5 day	1/Week	1	0	11/15/2012
001	00665	Phosphorus, Total (P)	1/Month	1	0	11/1/2012
001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	12/1/2012
001	00665	Phosphorus, Total (P)	1/Month	1	0	12/1/2012
001	00630	Nitrite Plus Nitrate,	1/2months	1	0	12/1/2012

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Please notify this office in writing, within 14 days receipt of this letter, of your intentions to address items 18 and 27. The letter should include dates, either actual or proposed, for completion of the actions.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/cs

Cc: Gene Davis, Class III Operator, efdavis<sub>2</sub> & ASSOCIATES



Figure 1



Figure 2