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

June 19, 2013

RE: LAKE COUNTY
CITY OF KIRTLAND
OPERATED PACKAGE PLANTS
COMPLIANCE EVALUATION INSPECTIONS
NPDES PERMIT NOS. - 3PG00059, 3PG00058, 3PG00065, 3GV00014

Mayor and Council
City of Kirtland
9301 Chillicothe Road
Kirtland, OH 44094

NOTICE OF VIOLATIONS

Gentlemen:

On June 14, 2013, this writer conducted inspections of the Hickory Hill Colony, Rockwood Ledges, Shenandoah Estates and Kirtland Community Center wastewater treatment plants (WWTPs). The purpose of the inspections was to evaluate the facilities' compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permits. The operator of record for the plants, Mr. Steve Piscopo, represented the city during the inspections.

Plant Observations and Comments on NPDES Permit Requirements:

Hickory Hill Colony WWTP (NPDES Permit No. 3PG00059)
The plant was producing an effluent with satisfactory visual quality, free of solids and oil and grease. All required treatment units were in operation. Moss was evident on the surface of the filter beds. Mr. Piscopo stated that he has been working on removing vegetation from the city's surface sand filters and will work on Hickory Hill soon.

The operation and maintenance log book is satisfactory and is located in the onsite building.

No signage was observed at the plant effluent outfall. This is a violation of Part II, Item M of the current NPDES permit.

A review of the plant's discharge monitoring reports for the period of December 2011 to May 2013 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	5.4	1/1/2013
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.341	.34327	1/1/2013
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.511	.59273	1/1/2013

Rockwood Ledges WWTP (NPDES Permit No. 3PG00058)
The plant was producing an effluent with satisfactory visual quality, free of solids and oil and grease. All required treatment units were in operation. Two of the four filter beds had moss on its surface. Mr. Piscopo was in the process of cleaning the filter beds at this plant.

The operation and maintenance log book is satisfactory and is located in the onsite building.

No signage was observed at the plant effluent outfall. This is a violation of Part II, Item M of the current NPDES permit.

A review of the plant's discharge monitoring reports for the period of December 2011 to May 2013, revealed the following effluent limitation violation:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	7D Conc	2000	2167.48	10/1/2012

Shenandoah Estates WWTP (NPDES Permit No. 3PG00065)
The plant was producing an effluent with satisfactory visual quality, free of solids and oil and grease. All required treatment units were in operation. Operation and maintenance of the plant was satisfactory.

The operation and maintenance log book is satisfactory and is located in the onsite building.

No signage was observed at the plant effluent outfall. This is a violation of Part II, Item M of the current NPDES permit.

A review of the plant's self-monitoring reports for the period of December 2011 through May 2013 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.87	2/8/2013
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.213	.2212	2/8/2013

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permits may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

This office has reviewed your reports addressing the reasons for the violations at the above referenced WWTPs and the corrective action taken. No additional information is requested at this time.

Kirtland Community Center WWTP (NPDES Permit No. 3GV00014)
This plant consists of an aeration tank with a very small settling tank. The plant has no tertiary treatment or satisfactory disinfection facilities. At the time of inspection, the plant was discharging a clear effluent.

In a letter dated April 26, 2013, Mr. Mark Tyler, Mayor of the City of Kirtland, notified this office that the wastewater treatment system would be converted to a soil dispersal system and the discharge to waters of the state would be eliminated. The following construction schedule was presented:

Complete design .....May 31, 2013
LCGHD review.....June 15, 2013
Solicit bids and award contract.....July 10, 2013
Complete construction.....September 1, 2013

In an e-mail message dated May 3, 2013 from Mr. Phil Kiefer, City Engineer, notified this writer that the City of Kirtland met with the Ms. Laura Kramer Kuns of the Lake County General Health District (LCGHD), Mr. Floyd McCleary, CPSS of McCleary Soils Investigation, Inc. and Ms. Kathy Bender, PE of KRB Engineering, Inc. to discuss converting the existing sewage system to a soil dispersal system.

Notice of Termination (NOT) for Kirtland Civic Center WWTP (NPDES Permit No. 3GS00017)
The Civic Center has connected to the Chillicothe Road public sanitary sewer. The extended aeration plant has been demolished. An NOT of the discharge became effective October 29, 2012.

Actions to be Taken by Permittee
All sludge, sludge laden sand and vegetation must be removed from the surface of the filter beds and replaced with clean, Ohio EPA approved sand. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on the all the filter beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed.

A permanent marker must be placed on the stream bank of each outfall regulated by an NPDES permit. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the Ohio EPA permit number and the outfall number, and a contact telephone number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet. For additional specific requirements, please refer to the NPDES permits for the Hickory Hill Colony, Rockwood Ledges and Shenandoah Estates WWTPs.

For the WWTP serving the Kirtland Community Center, once construction of the soil dispersal system has been completed and the discharge to waters of the state has been eliminated, notify the Northeast District Office in writing and submit to the Central Office of the Division of Surface Water, a Notice of Termination (NOT) form for the General NPDES permit.

Within 10 days of the date of this letter, please submit a letter outlining the corrective actions that will be implemented to eliminate the highlighted violations summarized in this letter. Your response should include the dates, either actual or proposed, for completion of the actions.

Should you have any questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,

Marie Underwood

Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water\

MU/cs

cc: Phil Kiefer, P.E. City Engineer
Steve Piscopo, Operator of Record