



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

July 25, 2013

RE: CUYAHOGA COUNTY
CITY OF STRONGSVILLE "C" WWTP
NPDES PERMIT NO. OH0033707
OHIO EPA PERMIT NO. 3PD00048
COMPLIANCE EVALUATION INSPECTION

Mayor Thomas Perciak
City of Strongsville
5200 Dover Center Road
North Olmsted, OH 44070

Dear Mayor Perciak:

On June 19, 2013, a Compliance Evaluation Inspection (CEI) was conducted at the City of Strongsville "C" Wastewater Treatment Plant (WWTP). The facility was represented by Mr. Richard Meloy, Project Manager, American Water Services. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the treatment processes, effluent discharge quality, laboratory, and biosolids management.

NPDES Permit Status

The current NPDES permit for this facility was issued on August 1, 2012 and expires on July 31, 2017. The permit authorizes an average daily discharge of 1.8 MGD from the facility to a tributary of Baldwin Creek.

Facility Description

The wet stream treatment process consists of preliminary treatment, primary clarification, rotating biological contactors, secondary clarification, tertiary sand filtration, chlorination/dechlorination, and post aeration prior to discharging to the receiving stream.

Sludge handling consists of anaerobic digestion and mechanical dewatering using a filter press. The dewatered sludge is presently land applied by AgriSludge.

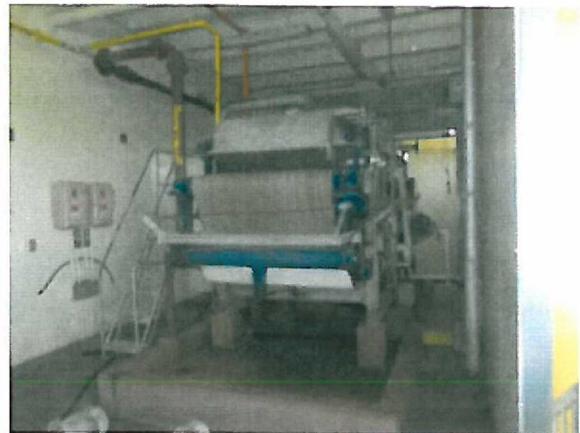
Inspection Findings/Compliance Status

At the time of the inspection, the following observations and comments were noted:

- The general operation and maintenance of the treatment plant appeared to be satisfactory. However, it was noted that RBC #2 and #10 were out of service due to gear box failures. We understand that the facility has already replaced 4 of the 12 gear boxes with newer "belt drive" units.
- A visual observation of the plant effluent revealed no signs of floating debris, oil & grease, or foam in the discharge.

- We understand that the City's current operations contract with American Water runs through 2014.





- The review of the plant laboratory noted that the following permit parameters are currently being analyzed in-house: DO, pH, Temperature, cBOD, Suspended Solids, Fecal Coliform, Ammonia, Nitrate-Nitrite, and Phosphorus. The balance of the permit parameters are analyzed by Precision Analytical, Inc., Cleveland, Ohio. The following highlights were noted during the review:
 - The laboratory was clean and organized. Standard operating procedures (SOPs) are maintained by the lab analyst, Meena Chowdhary, in electronic and hardcopy formats.
 - The facility must develop a comparability study between distilled and un-distilled Ammonia-N samples. Manual distillation is not required if the data shows a difference of less than 10 %. The study may be coordinated with an external laboratory.
 - It appears that the method detection limits (MDLs) being used for the analyses of the following parameter(s) may need to be revised in order to demonstrate consistent compliance with the downstream Water Quality Standards (WQS):

Parameter	WQS	Reported MDL
Cadmium	4.0 ug/l	10.0 ug/l

Discharge Monitoring Reports

Discharge monitoring reports (DMR) received by Ohio EPA for the period, August 2012 – June 2013, were reviewed. A summary of the Outfall 001 discharge data is listed in Attachment A. Additionally, the data was reviewed for compliance with the final effluent limitations and monitoring requirements of the NPDES for the past 12 months. Violations of the NPDES permit at Outfall 001 are listed in Attachment B.

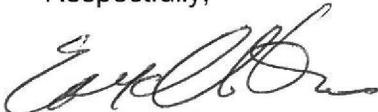
In addition to the above, the review of the DMRs noted that the following reporting items need to be verified/corrected (applicable to "B" Plant as well):

- Method detections limits (MDLs) for Hex. Chromium, Ammonia-N, E.coli, and Mercury.
- All hardcopy DMRs must be signed.

Please be advised that any violations referenced herein are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of 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,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/cs

Enclosure

cc: Richard Meloy, Strongsville WWTP

Attachment A: Strongsville "C" WWTP Effluent Discharge Summary (8/2012- 6/2013)						
Parameter	Season	Units	# Obs.	Percentiles		Data Range
				50 th	95 th	
Outfall 001						
Water Temperature	Annual	C	334	17	23	12-24
Dissolved Oxygen	Annual	mg/l	334	8.7	9.6	6.3-10.8
Total Suspended Solids	Annual	mg/l	142	4.4	9	0-26
Oil and Grease, Hexane Extr Method	Annual	mg/l	23	0	0	0-0
Nitrogen, Ammonia (NH3)	Annual	mg/l	142	0.172	1.2	0.0229-3.19
Nitrogen Kjeldahl, Total	Annual	mg/l	11	1.68	2.26	0.13-2.31
Nitrite Plus Nitrate, Total	Annual	mg/l	11	15.6	18.8	1.36-18.9
Phosphorus, Total (P)	Annual	mg/l	143	0.508	0.849	0-2.34
Cyanide, Free	Annual	mg/l	4	0	0	0-0
Nickel, Total Recoverable	Annual	ug/l	4	0	0	0-0
Zinc, Total Recoverable	Annual	ug/l	4	29.9	35.7	21.4-36.1
Cadmium, Total Recoverable	Annual	ug/l	4	0	0	0-0
Lead, Total Recoverable	Annual	ug/l	4	0	0	0-0
Chromium, Total Recoverable	Annual	ug/l	4	0	0	0-0
Copper, Total Recoverable	Annual	ug/l	11	10.4	13.1	0-13.5
Chromium, Dissolved Hexavalent	Annual	ug/l	4	0	0	0-0
Fecal Coliform	Annual	#/100 ml	37	30	166	1-200
E. coli	Annual	#/100 ml	63	4	33.9	0-150
Flow Rate	Annual	MGD	334	0.843	1.8	0.468-5.2
Chlorine, Total Residual	Annual	mg/l	153	0	0	0-0
Mercury, Total (Low Level)	Annual	ng/l	18	0.771	2.99	0-4.15
Acute Toxicity, Ceriodaphnia dubia	Annual	TUa	1	0	0	0-0
Chronic Toxicity, Ceriodaphnia dubia	Annual	TUc	1	0	0	0-0
Acute Toxicity, Pimephales promelas	Annual	TUa	1	0.2	0.2	0.2-0.2
Chronic Toxicity, Pimephales promelas	Annual	TUc	1	0	0	0-0
pH, Maximum	Annual	S.U.	334	7.27	7.48	6.89-7.71
pH, Minimum	Annual	S.U.	334	7.17	7.44	6.8-7.71
Residue, Total Filterable	Annual	mg/l	11	644	1030	480-1060
CBOD 5 day	Annual	mg/l	141	4	11.4	0-14.7

Attachment B: Strongsville "C" WWTP Effluent Violations Summary (8/2012- 6/2013)						
Reporting Period	Station	Parameter	Limit Type	Limit (*)	Reported Value	Violation Date
August 2012	001	Mercury, Total (Low Le	30D Conc	1.4	2.575	8/1/2012