



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

September 11, 2013

RE: LAKE COUNTY  
 KIRTLAND  
 HOLDEN ARBORETUM  
 LANTERN COURT  
 9203 KIRTLAND-CHARDON ROAD  
 NPDES PERMIT NO. 3PR00474

Mr. Al Picciano, Maintenance Director  
 Holden Arboretum  
 9500 Sperry Road  
 Kirtland, OH 44094

Dear Mr. Picciano:

On September 5, 2013, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves Lantern Court. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit.

At the time of inspection, the plant was in operation, producing an effluent of satisfactory visual quality in that there was no evidence of foam, debris, oil or grease. The wastewater treatment plant consists of a trash trap, septic tanks, a dosing chamber, peat biofilters and an ultra-violet disinfecter. During the inspection it was noticed that the covers to the UV disinfecter and sampling tanks were not secure. The covers to these tanks should be secured, yet the tanks must be accessible to the plant operator and Ohio EPA inspectors when needed.

A review of the Discharge Monitoring Reports (DMRs) covering the period May 2012 through July 2013 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	2.5	6/12/2012
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	4.8	6/26/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.8	6/1/2012
001	00300	Dissolved Oxygen	1D Conc	6.0	2.3	8/7/2012
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	3.8	8/7/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.8	8/1/2012
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.004	.00801	8/7/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.003	.00801	8/1/2012
001	00300	Dissolved Oxygen	1D Conc	6.0	3.1	12/4/2012
001	00530	Total Suspended Solids	30D Conc	12	22.	6/1/2013
001	00530	Total Suspended Solids	7D Conc	15	22.	6/1/2013
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.48	6/1/2013
001	80082	CBOD 5 day	30D Conc	10	12.	6/1/2013

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The review of the DMRs also revealed a misuse of the data (A) substitution codes. The A-substitution code for no discharge (AC) has been used for the following parameters on the following days:

Temperature, Color, Flow- 1/8/13, 1/17/13, 1/24/13  
Turbidity- 1/8/13, 1/17/13, 1/24/13, 2/5/13, 2/14/13, 2/21/13, 3/7/13, 3/14/13, 3/21/13, 3/28/13,  
3/28/13, 4/18/13, 4/25/13, 5/2/13, 5/16/13, 6/6/13, 6/13/13, 6/20/13, 6/27/13, 7/2/13,  
7/5/13, 7/11/13, 7/18/13, 7/25/13

Yet, on each of these days, a discharge flow is reported. The use of the AC code in this manner is a misuse of the data substitution code, and a violation of the NPDES permit. If there is a discharge from the plant, all permit required parameters must be monitored and reported at the required measuring frequency.

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

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

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

Sincerely,



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

MU:bo