



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

September 13, 2013

RE: LAKE COUNTY
KIRTLAND
HOLDEN ARBORETUM-MAIN WWTP
NPDES PERMIT NO. 3PR00467

NOTICE OF VIOLATION

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 (WWTP) that serves the Holden Arboretum buildings consisting of the Thayer Building, Corning Building, Cooper Annex and the Horticultural Grounds Building. 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. Mr. Rick Wilson represented Holden Arboretum during the inspection.

Plant Observations

At the time of inspection, the plant was producing an effluent of satisfactory visual quality in that there was no evidence of foam, debris, oil or grease. The following observations were noted:

- The aeration plant was in operation. The aeration tank mixed liquor was chocolate brown in color, typical for extended aeration plants. The settling tank had sludge on its water surface. Sludge return or wasting may need to be adjusted. Please consult with your operator of record.
- The filter beds contained vegetation on the surface. The vegetation and any sludge laden filter sand must be removed from the filter bed and disposed in a public landfill. Assurance must be made that 18 inches of Ohio EPA approved sand exists on the filter bed. Ohio EPA approved filter sand has an effective size of 0.4 to 1.0 mm and a uniformity coefficient not greater than 3.0. The sand must be raked and evenly distributed across the filter bed surface.
- The dirt supporting the filter bed distribution box has been removed. According to Mr. Wilson, a ground hog persistently digs into the dirt surrounding the distribution, creating a hole in this area. Steps should be taken to fill the hole created by the ground hog.
- UV disinfection was providing disinfection of the treated effluent.
- Signage has been erected at the plant effluent, as required.
- The operation and maintenance log book was satisfactory.

NPDES Permit/Code Violations

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	00530	Total Suspended Solids	30D Conc	12	38.	7/1/2012
001	00530	Total Suspended Solids	7D Conc	18	38.	7/1/2012

In addition, there were numerous instances where plant personnel did not record, odor, turbidity and color, and A-substitution codes were reported in place of applicable numbers. This is an invalid use of the A-substitution codes. All required parameters must be monitored and reported, in accordance with the NPDES permit. Misuse of the A-substitution codes is a violation of the NPDES permit.

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 (ORC) 6111.

Permittee Actions

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/cs