



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

September 30, 2013

RE: PHEASANT RUN WWTP
PERMIT NO. 3PW00001
LORAIN COUNTY
LAGRANGE TOWNSHIP

Ms. Hilda Hollingshead, Board President
Pheasant Run Association
200 East Lake Drive
P.O.Box 522
Lagrange, Ohio 44050

Dear Ms. Hollingshead:

On September 11, 2013, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Steve Howe, Class III Waste Water Treatment Plant Operator of Record and Mr. Thomas Corey Smith and Mr. Kyle Squire both Pheasant Run employees. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with 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 observed/ discussed:

1. Ake Environmental Services has been contracted and placed in charge of the technical operations of the wastewater treatment plant since March 1, 2012.
2. Ake Environmental Services has been awarded a 2 year contract to operate the wastewater treatment plant along with its associated duties.
3. Mr. Howe, Operator of Record, is responsible for the collection of the effluent samples, entering the analytical results into Ohio EPA's Surface Water Information Management System, and pinning the monthly discharge monitoring report.
4. 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.
5. Mr. Howe indicated that the plant is visited 5 days per week for approximately one hour per visit.
6. The daily activities are documented in a log book and maintained on the premises.
7. During the last inspection on September 11, 2012, Ms. Jessica Collier, the former office manager, indicated that Mr. Howe would attend Pheasant Run's quarterly board meetings. Mr. Howe indicated that to date, he has not been asked to attend any board meetings. Mr. Howe's attendance may prove to be invaluable so that all board members hear firsthand the ongoing compliance and operational problems associated with the wastewater treatment plant.

8. Mr. Howe indicated that refrigerators were going to be purchased for the automatic samplers during the last inspection. Ake Environmental Services installed an ISCO GLS sampler and placed it in a makeshift refrigerator. The sampler is required to be flow proportion and the existing one is not. In addition, no thermometer was in the refrigerator. The sample is required to be maintained at a temperature of 4.0 degrees centigrade.
9. To date, no refrigerator has been purchased for the influent sampler.
10. Mr. Howe indicated that the flow meter was last calibrated in April 2012.
11. Solids are being wasted daily and concentrated in the three digesters and sludge holding tank.
12. The digesters and sludge holding tank were not being aerated during the inspection. Mr. Howe indicated he was allowing the solids to settle/concentrate so the clear water could be returned back to the treatment plant.
13. Mr. Howe indicated that approximately 15,000 - 20,000 gallons of solids are hauled out per month.
14. The current hauler is Supeck Septic Services LLC. The solids are being hauled to French Creek WWTP.
15. The blowers were running and the plant was receiving good aeration on the original aeration tanks and the newer southern and northern aeration tanks.
16. The contents of the aeration tank were medium brown in color.
17. Both sludge return lines were functioning properly and returning medium brown water.
18. During the last inspection, the surfaces of the aeration tanks were covered with a thick layer of filamentous bacteria. The filamentous bacteria are still present on the surface of the aeration tanks. See Figure 1. Approximately 90% of the surface was covered with the bacteria.
19. Mr. Howe indicated that he was adding 1500 grams of 54% granular chlorine feed to the sludge return wells five days per week to treat for the bacteria.
20. Minimal scum/ solids deposition was floating on top of the settling tanks. These solids should be removed on a regular basis.
21. Both tertiary disk filters were in service. Mr. Howe indicated that both units were scheduled to be cleaned the following week since they have not been serviced since last year.
22. The tertiary filter backwash is discharge to the old flow equalization tank and then pumped back to the head of the plant.
23. The chlorine contact tank was being aerated.
24. The effluent is chlorinated with a 12.5% solution of liquichlor.
25. A 38%-40% solution of sodium bisulfate is added in the chlorine contact tank to de-chlorinate the effluent.
26. The discharge was clear. No impact to the receiving stream was observed.
27. A permanent marker was posted at outfall 3PW00001001 per the requirement of Part II, Letter L of the facility's NPDES permit.
28. Northcoast Lab is no longer contracted to perform the lab analysis. Ake Lab took over on April 2, 2017.
29. The plant screenings are picked up by Republic and taken to the Lorain County Landfill.
30. During the last inspection, Ms. Collier indicated that she received a quote for 28,000 dollars to dye test five streets. This represents approximately 25% of the

development. Mr. Howe indicated that study of the infrastructure has been completed. Storm Water Control Services, LLC conducted a sewer system evaluation. This report was recently provided to Pheasant Run Association Board members. **Please provide this Office two copies of this report no later than October 15, 2013.**

31. Since the last inspection, Mr. Howe has submitted three Sanitary Sewer Overflow 5-day Follow Up reports indicating that the treatment plant has overflowed its tanks. The specific dates are as follows. (January 11, 2013, April 8, 2013, and July 10-11, 2013) Mr. Howe indicated that none of the three overflows made it to the receiving stream.
32. Currently, the overflow from July 10th was still in the process of being cleaned up. Gravel intermingled with sludge was being collected and placed in a 20 yard³ roll off box. One was entirely filled. See Figures 2. & 3. Mr. Howe estimated that a second roll of box would be required.
33. A waste profile of the containerized material is being required by Republic Services. If accepted, the material will be hauled to the Lorain County Landfill.
34. On July 19, 2012, Pheasant Run provided this office with a Wastewater Treatment Plant Hydraulic Evaluation, which was prepared by GRW Engineers Inc. The report recommended improvements to the equalization basin. These improvements consisted of the following:
 - a. Diverting the influent flows directly to the equalization basin.
 - b. Installation of 2 new submersible pumps for delivering flow to the aeration basins.
 - c. Installation of new flow meters on the equalization pumps and existing sludge pumps.

The estimated cost of these improvements was \$ 98,450. dollars.
35. **On October 1, 2012, details plans for the treatment plant improvements were received by this Office. On December 3, 2012, a Permit-To-Install was issued authorizing the construction for the treatment plant improvements. To Date, no construction has been initiated. Mr. Howe indicated that he has not heard from the engineer in approximately six months. Please inform this Office why these improvements have not been initiated.**

This office has recently reviewed your self-monitoring reports covering the period September 1, 2012 through August 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	00665	Phosphorus, Total (P)	30D Conc	1.0	2.75	9/1/2012
001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.75	9/8/2012
001	00665	Phosphorus, Total (P)	30D Qty	0.38	.64534	9/1/2012
001	00665	Phosphorus, Total (P)	7D Qty	0.57	.64534	9/8/2012
001	00530	Total Suspended Solids	7D Conc	18.0	26.5	12/22/2012
001	00530	Total Suspended Solids	7D Qty	6.8	8.62602	12/22/2012

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Qty	6.8	8.58389	4/8/2013
001	00530	Total Suspended Solids	7D Qty	6.8	19.0806	7/8/2013
001	00530	Total Suspended Solids	30D Qty	4.5	5.07741	7/1/2013
001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.43	8/1/2013
001	00665	Phosphorus, Total (P)	30D Qty	0.38	.39149	8/1/2013

Code Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31648	E. coli			AK	10/30/2012

Please notify this office in writing, within 15 days receipt of this letter, with an update on items 8, 9, 30, 31-33, and 35. The letter should include dates either actual or proposed.

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

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

ec: Janean Weber, Attorney General's Office
Steve Howe, Ake Environmental Services

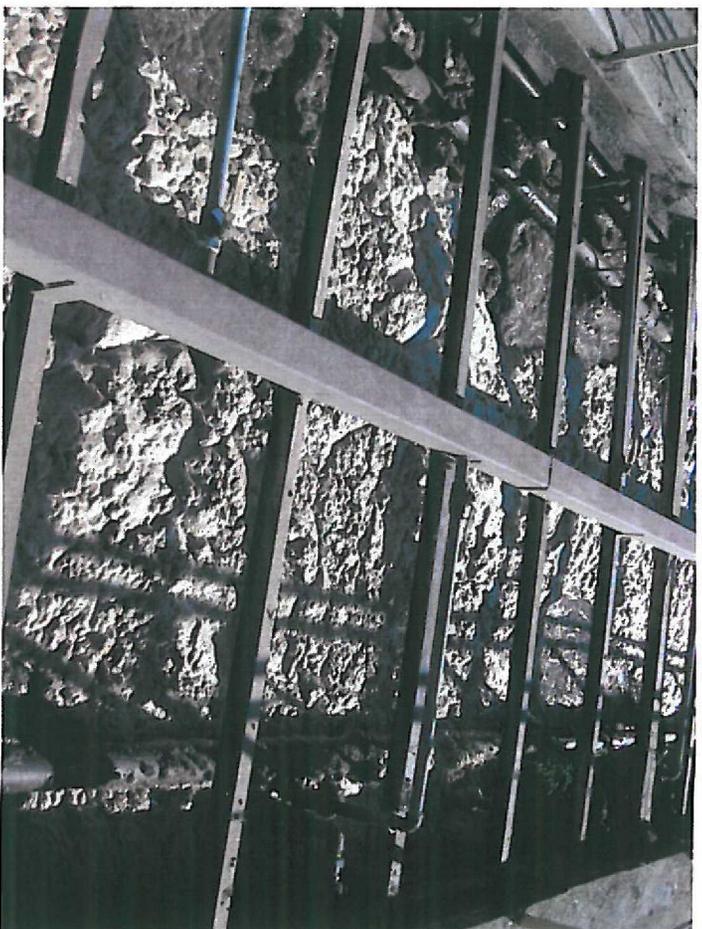


Figure 1



Figure 2



Figure 3