

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

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December 8, 2010

RE: GOODYEAR WINGFOOT LAKE HANGAR
PERMIT NO. 3IC00022
PORTAGE COUNTY
MOGADORE

Mr. Greg Stallings
Environmental Engineer
The Goodyear Tire and Rubber Company
1144 East Market Street, Dept. 480-B
Akron, Ohio 44316

Dear Mr. Stallings:

On November 8, 2010, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Scott Babbo, Project Manager and Mr. Harry Weaver, Maintenance. 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 noted/discussed:

1. The plant design of the wastewater treatment system is 2,000 gpd.
2. Wastewater Services, Inc. is the current operator of the treatment system. Mr. David Samsa of Wastewater Services is responsible for collecting the samples and reporting the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
3. Mr. Samsa visits the wastewater treatment plant once per week.
4. Mr. Babbo indicated that the treatment system typically serves 20-25 employees on average with a maximum of 53 on any given day. One to three conference rooms can be used by corporate which accounts for the additional 20-30 people per day.
5. The blowers were running and the plant was receiving good aeration.
6. The contents of the aeration tank were light brown in color and no foam was present. The plant appears to be organically underloaded. A medium brown color is more typical of a properly running plant.
7. The sludge return line was functioning properly. However the discharge was light brown in color.
8. The skimmer return line was functioning properly and returning clear water. The skimmer was properly adjusted.
9. No scum build-up was present behind the baffle in the settling tank.

10. The weirs and the sidewalls in the settling tank were also free of scum build-up.
11. Both surface sand filter beds were free of vegetation. However, a sludge layer was present on both surface sand filter beds. See Figures 1 & 2. The sludge should be removed and properly disposed at a licensed solid waste landfill.
12. The chlorination/dechlorination units were not evaluated. Please note that chlorination/ dechlorination is required from May 1st through October 31st.
13. The discharge was not observed.
14. The facility's permit expires on August 31, 2011.
15. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit the appropriate renewal forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration. Please note that a \$ 200.00 dollar application renewal fee is required at the time of submission. The check shall be made payable to: "Treasurer, State of Ohio"

This office has recently reviewed your self-monitoring reports covering the period September 1, 2008 through October 31, 2010 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:

Frequency Violations

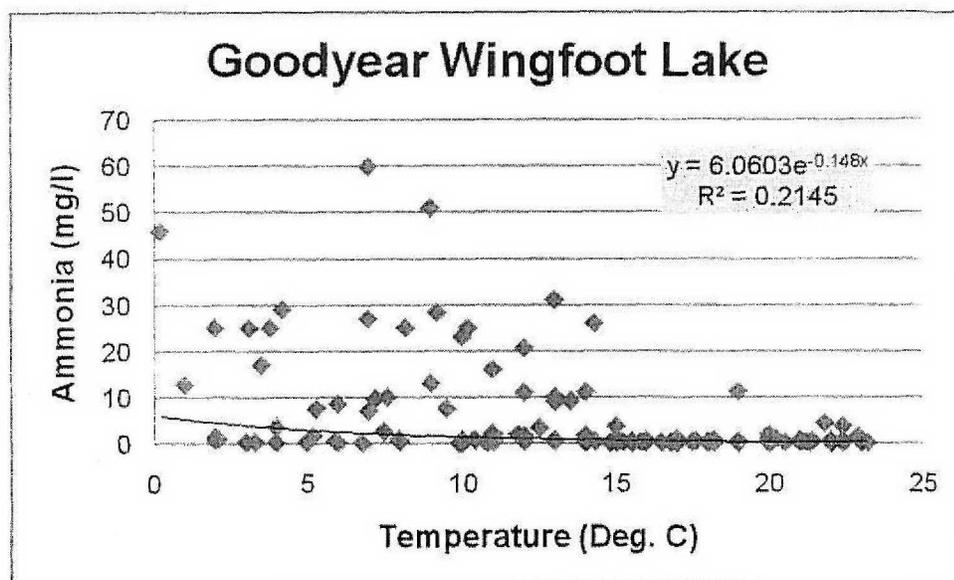
Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
003	00300	Dissolved Oxygen	1/Week	1	0	05/22/2009
003	01350	Turbidity, Severity	1/Day	1	0	03/08/2010

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	17.	1/1/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	17.	1/8/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	29.	2/1/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0227	.1225	2/1/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	29.	2/12/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.0341	.1225	2/12/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	25.	3/1/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0227	.12263	3/1/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	25.	3/12/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.0341	.12263	3/12/2009

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.069	4/1/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	9.17	4/7/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.83	10/1/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0076	.00997	10/1/2009
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	1.83	10/8/2009
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	7.55	1/1/2010
003	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0227	.02366	1/1/2010
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	7.55	1/14/2010
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	28.3	2/1/2010
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	28.3	2/11/2010
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.37	6/1/2010
003	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.37	6/1/2010
003	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.0076	.01489	6/1/2010
003	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	4.37	6/17/2010
003	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.0114	.01489	6/17/2010

Review of the facility's file indicates that the facility has had ongoing ammonia violations for more than a decade. A review of data from 2000 to present indicates a weak association between temperature and ammonia concentrations as depicted in the graph below. There does appear to be a break in the data at around 15°C where temperatures below this seem to have more frequently elevated ammonia concentrations.



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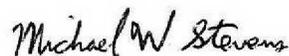
In addition to the above violations it has been noted that phosphorus is being discharged from Goodyear Wingfoot Lake Hangar's wastewater treatment plant at elevated concentration levels, a median value of 5.92 mg/l and maximum of 21.49 mg/l. Phosphorus is a pollutant of concern identified in the approved Lower Cuyahoga River TMDL. In addition, as a nutrient, phosphorus is associated with algal blooms, an identified issue in Wingfoot Lake this year. Phosphorus can be removed by addition of ferric chloride at the intake of the wastewater treatment plant or other methods identified by your consultant. An alternative to direct discharge to Wingfoot such as drip irrigation could also be evaluated as another option, as long-term median flow values are 756 gpd with a 75% flow at 1116 gpd. Any treatment option utilizing soils is dependent on the specific soil types at the site which should be evaluated prior to pursuing an onsite option. All treatment options will require the submittal of a permit to install application, an antidegradation addendum form, along with the appropriate fees. When the existing permit is renewed a schedule of compliance will be placed in the permit requiring action to be taken to reduce the phosphorus concentration being discharged into Wingfoot Lake.

Please notify this office in writing within 30 days receipt of this letter indicating what actions are going to be taken to prevent the ongoing ammonia violations along with your intentions of addressing the phosphorus issue. The letter should contain dates either actual or proposed for completion of the actions.

Please be advised that such instances of noncompliance may be cause for 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/mt

Enclosure: Business Card

pc: Scott Babbo



Figure 1



Figure 2

