



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

October 28, 2011

RE: LORAIN COUNTY RESOURCE
RECOVERY COMPLEX
PERMIT NO: 3PR00394*BD
LORAIN COUNTY
OBERLIN

Mr. Dan Schoewe
Operations Manager
Lorain County Resource Recovery Complex
43650 Oberlin-Elyria Road
Oberlin, Ohio 44074

Dear Mr. Schoewe:

On October 25, 2011, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by you. The purpose of the inspection was to evaluate the operation and maintenance of the treatment plant 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. Uni-Tech Environmental Services Inc. is contracted to operate the wastewater treatment system.
2. As previously stated in the last correspondence from this office dated January 28, 2011, the classification for the treatment works regulated under the above referenced permit is a Class "A". The classification requires that the plant operator be present at the plant two days/week for a minimum of 1.0 hr/week. During the inspection, it was unclear if Uni-Tech Environmental Services is meeting the two days per week requirement.
3. The last correspondence further indicated that a log book should be maintained at the treatment plant. No field log book was being maintained at the treatment plant. Ohio operator certification rules require that a field log book be maintained at the treatment plant. You indicated that a mailbox was recently purchased and would be installed at the treatment plant to provide a storage area for a field log book.
4. The blowers were running and the plant was receiving good aeration.
5. The contents of the aeration tank were light brown in color and no foam was present. This indicates that the plant is organically under loaded.
6. The skimmer return line was functioning properly and returning clear water.

7. The sludge return line was working properly and was returning light brown water.
8. Approximately half of the settling tank was covered with floating solids.
9. The weirs and the sidewalls in the settling tank were severely covered with algae/solids build-up. See Figure 1. The weirs and sidewalls should be scraped down immediately.
10. Solids build-up was also present behind the baffle in the settling tank. This material should be pumped out routinely.
11. Minimal vegetation was present in the surface sand filter beds along with a thin layer of sludge. See Figure 2. The surface sand filter beds should be raked free of all solids and be maintained free of all vegetation. All vegetation and solids should be properly disposed at a licensed landfill.
12. Due to the grating cover being locked on the chlorine contact tank, the observation was made through the grating. It appeared that the dispensing tubes were not adequately stocked with chlorine tablets and the remains of a chlorine tablet was swollen and stuck in one tube. It appeared that the effluent was not coming into contact with any chlorine tablets. Chlorination is required from May 1st through October 31st. Also, the dispensing tube caps were missing. Both dispensing tube caps should be replaced prior to next year's chlorination season.
13. Both lift station pumps were tested. No flow was observed being pumped. Both pumps should be tested to confirm that they are operational.
14. It was discussed that the high flow rates being reported was due to storm water running down the access driveway and flowing into the lift station vault. See Figure 3. You indicated that the facility had plans to install a diversion berm around the lift station vault to prevent this problem from occurring.
15. The discharge to the evaporation pond was visually clear and appeared to be having no impact.

This office has recently reviewed your self-monitoring reports covering the period December 1, 2010, through September 30, 2011, 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
601	00530	Total Suspended Solids	30D Qty	0.363	.54286	6/1/2011
601	31648	E. coli	30D Conc	161	240.312	6/1/2011
601	00530	Total Suspended Solids	30D Conc	12	50.	8/1/2011
601	00530	Total Suspended Solids	30D Qty	0.363	3.352	8/1/2011
601	00530	Total Suspended Solids	7D Conc	18	50.	8/15/2011
601	00530	Total Suspended Solids	7D Qty	0.545	3.352	8/15/2011

Facilities with wastewater treatment plants that are in Significant Non-Compliance (SNC) with their NPDES permit effluent limits must be returned to compliance in a timely manner.

SNC is defined by the USEPA as a 40% exceedance of specific conventional pollutant limits (1.4 x parameter effluent limit), or a 20% exceedance of toxic pollutant limits (1.2 x parameter effluent limit), at a given discharge point for any two or more months, during any two consecutive quarter period reviewed.

- a) Conventional pollutants include: BOD/CBOD; total suspended solids; nutrients such as nitrogen (ammonia) and phosphorus; oil & grease.
- b) Toxic pollutants include: total chlorine residual; heavy metals; cyanide.

Utilizing data submitted for the Lorain County Resource Recovery Complex WWTP, the facility is in SNC for Total Suspended Solids and E. coli. The attached document details the parameters in SNC for the last six month period (April 2011 through September 2011).

This correspondence shall serve as the initial step in the development and implementation of a plan to bring your facility back into compliance with your NPDES permit.

You are directed to respond to this office in writing within 14 days of the receipt of this letter detailing what actions you have taken or intend to take to come into compliance with the facility's NPDES permit effluent limits. The letter should include dates, either actual or proposed, for completion of the actions. The letter should also address items 2, 3, 8, 9, 10, 11, 12, 13, and 14. Additional enforcement actions may be taken by the Ohio EPA should compliance not be attained within the next reporting quarter.

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

Limit Violations

Permit No 3PR00394

4/1/2011 - 9/30/2011

Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
BFI Lorain County Resource Recovery Complex	Jun 2011	601	00530	Total Suspended Solids	30D Qty	0.363	.54286	6/1/2011
BFI Lorain County Resource Recovery Complex	Jun 2011	601	31648	E. coli	30D Conc	161	240.312	6/1/2011
BFI Lorain County Resource Recovery Complex	Aug 2011	601	00530	Total Suspended Solids	30D Conc	12	50.	8/1/2011
BFI Lorain County Resource Recovery Complex	Aug 2011	601	00530	Total Suspended Solids	30D Qty	0.363	3.352	8/1/2011
BFI Lorain County Resource Recovery Complex	Aug 2011	601	00530	Total Suspended Solids	7D Conc	18	50.	8/15/2011
BFI Lorain County Resource Recovery Complex	Aug 2011	601	00530	Total Suspended Solids	7D Qty	0.545	3.352	8/15/2011



Figure 1



Figure 2



Figure 3