

From: "Rick Eberle" <rick.eberle@alutilities.com>
To: <chris.moody@epa.state.oh.us>
CC: <Richard.Blasick@epa.state.oh.us>, "john" <john@alutilities.com>, "Jerem...
Date: 4/30/2010 4:47 PM
Subject: OEPA letter of April 8,2010
Attachments: Monofill 043010.pdf

Chris:

I wanted to make sure I responded to your subject letter (attached) by April 30, 2010 and therefore offer the following as Avon Lake Municipal Utilities' progress on your request:

1. ALMU has investigated several alternatives for sludge disposal and will outline each of them including possibly seeking a change to the current Ohio EPA rules on sanitary sludge monofills in a formal submittal shortly. For at least the short term ALMU is in final negotiations with Republic Wastes for disposal of all of ALMU's dewatered sludge at Republic's solid waste landfill in Lorain County. In part these negotiations have taken a considerable amount of time because Republic has previously never allowed sanitary sludge to be disposed of in their Lorain County facility. The successful conclusion of these negotiations will allow ALMU to minimize what will still be a considerable cost in comparison to our present use of a USEPA acceptable sanitary sludge monofill. It is anticipated that an agreement can be completed within the next 30 days and formal notice will be sent to Ohio EPA upon its implementation.

2. In a meeting I had with Rich Blasick and as discussed in telephone calls since, it is my understanding that Ohio EPA was still in discussion internally on which of your divisions were going to oversee the Closure Plan approval for the ALMU sanitary monofill. Although it was stated that regardless of the division overseeing the closure that the plan would only have to meet the surface water requirements, ALMU was awaiting final word on OEPA's internal discussions before proceeding with preparing the plan but will proceed per your letter with preparing the plan in accordance with USEPA's Surface Disposal - A Guide for owners/operators of Surface Disposal Facilities on the Monitoring, Recordkeeping and Reporting Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR Part 503.

Again ALMU will follow-up this email with a formal reply to your letter as soon as an agreement with Republic Wastes is completed.

Rick Eberle

Chief of Utility Operations

Avon Lake Municipal Utilities

440-933-6226



State of Ohio Environmental Protection Agency

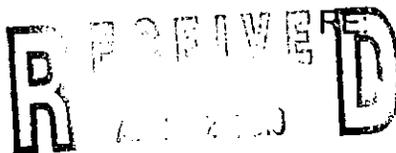
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 8, 2010



LORAIN COUNTY
AVON LAKE WWTP
3PD00003*KD

Avon Lake
Municipal Utilities

CERTIFIED MAIL

Mayor Karl Zuber
Avon Lake City Hall
150 Avon Belden Road
Avon Lake, Ohio 44012

Dear Mayor Zuber:

Via certified letter dated September 4, 2009, Ohio EPA notified the City of Avon Lake of noncompliance associated with the City of Avon Lake wastewater treatment plant's (WWTP) sewage sludge disposal operation, Ohio Administrative Code (OAC) Rule 3745-40, and the January 1980 Master Plan for Wastewater Collection and Treatment Response to Comment (i.e. the sewage sludge monofill authorized under grant number C391186-030).

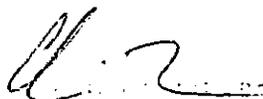
In order to address the noncompliance, Ohio EPA's certified letter required the City of Avon Lake to immediately begin evaluating alternative sewage sludge disposal operations and to perform the following:

1. Within five months of receiving the certified letter, Avon Lake WWTP must submit written correspondence detailing what alternative sewage sludge disposal operation (i.e. performing land application to agricultural fields via generating a Class A or Class B sewage sludge, performing beneficially use via generating an Exceptional Quality sewage sludge, transferring the generated sewage sludge to another National Pollutant Discharge Elimination System (NPDES) permittee for treatment and disposal; or disposing the generated sewage sludge within a licensed solid waste landfill that has been authorized to accept such wastes) will be selected and utilized; and
2. Within six months of receiving the certified letter, Avon Lake WWTP must perform the following corrective actions:
 - a. Cease utilizing the surface disposal monofill;
 - b. Terminate the addition of sewage sludge to the surface disposal monofill;

MAYOR KARL ZUBER
AVON LAKE WWTP
APRIL 8, 2010
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Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118.

Sincerely,



Chris Moody
Environmental Specialist
Division of Surface Water

CM/kw

cc: John Colletti, U.S. EPA Region 5 (WN-16J)
John Kniepper, Avon Lake Municipal Utilities
Rick Eberle, Avon Lake Municipal Utilities

ec: Rich Blasick, Ohio EPA, DSW, NEDO
Virginia Wilson, Ohio EPA, DSW, NEDO
Chuck Allen, Ohio EPA, DSW, NEDO
Clarissa Gereby, Ohio EPA, DSIWM, NEDO
Andrew Gall, Ohio EPA, DSW, NWDO
Jacob Howdyshell, Ohio EPA, CO