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1. Article Addressed to:
KARL ZUBER, MAYOR
AVON LAKE CITY HALL
150 AVON BELDEN RD.
AVON LAKE, OH 44012

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State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

May 11, 2010

RE: LORAIN COUNTY
AVON LAKE WWTP
3PD00003*KD

CERTIFIED MAIL

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

Dear Mayor Zuber:

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 via certified letter dated September 4, 2009. During subsequent meetings and correspondence, the City of Avon Lake requested clarification regarding which division (i.e. Surface Water or Solid and Infectious Waste Management) would administer the closure of the surface disposal monofill.

On May 7, 2010, Ohio EPA's Office of Legal Services determined that the closure of the surface disposal monofill is to be administered by the Division of Surface Water (DSW) under Ohio Revised Code Chapter 6111.

In order to resolve the noncompliance, the City of Avon Lake needs to pursue the following actions:

1. A statement that the City of Avon Lake will cease utilizing the surface disposal monofill on or before July 31, 2010; and
2. Develop a closure plan for the surface disposal monofill that consists of a Permit to Install (PTI) application that includes Form A, Form B4-7, detail plans, engineering reports and any other relevant attachments that address either:
 - i. Closing the surface disposal monofill in accordance with Section 2.5 and Appendix B of U.S. EPA's *Surface Disposal of Sewage Sludge – 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*. This document will provide the basic information related to closure. Prior to design, a conference call or meeting is recommended; or

- ii. Removal of all the sewage sludge contained within the surface disposal monofill and dispose of it within a municipal solid waste landfill facility (landfill) that has been authorized to accept such wastes. After completing sewage sludge removal operations, the surface disposal monofill must be graded and stabilized to eliminate the potential for erosion and discharges of pollutants (i.e. sediment) to "waters of the state."
3. Select an alternative sewage sludge disposal operation, see below, that will be implemented to replace the surface disposal monofill:
 - i. Performing land application to agricultural fields via generating a Class A or Class B sewage sludge;
 - ii. Performing beneficial use via generating an exceptional quality sewage sludge;
 - iii. Transferring the generated sewage sludge to another NPDES permittee for treatment and disposal; or
 - iv. Disposing of the generated sewage sludge within a landfill.

Please note that the WWTP's NPDES permit, No. 3PD00003*KD, only includes Station 587, which is utilized for reporting the sewage sludge fee weight. Depending on which alternative sewage sludge disposal operation is selected, appropriate comments will be required to be added to the e-DMR to detail the quantity and location where the generated sewage sludge is disposed. Additional clarification regarding proper e-DMR reporting will be provided by Ohio EPA upon the City of Avon Lake's selection of an alternative sewage sludge disposal operation. New sludge reporting station(s) will be incorporated into the 2011 renewal permit.

4. Submit a PTI application to resolve the unauthorized dedicated sanitary sewer that was constructed to connect the City of Avon Lake's drinking water plant (DWP) to the WWTP's sludge thickener. The PTI application will include Form A and B-1, detail plans, engineering reports and any other relevant documents.

Currently, the WWTP's sewage sludge is mixed with the DWP's alum sludge. If the City of Avon Lake elects to manage its sewage sludge in any other manner other than disposal within a landfill (item 3.iv above), then the dedicated sanitary sewer connection must be either eliminated or rerouted and connected to the head of the WWTP for treatment.

For your convenience, the above PTI forms can be obtained from the following website:

<http://www.epa.ohio.gov/dsw/pti/PTIForms.aspx>

KARL ZUBER, MAYOR
MAY 11, 2010
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The written correspondence, as detailed above, must be submitted to DSW by July 31, 2010. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail at chris.moody@epa.state.oh.us.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM:bo

pc: John Colletti, Biosolids Coordinator, USEPA Region 5 (WN-16J), NPDES
Programs Branch
John Kniepper, Chief Utilities Executive, Avon Lake Municipal Utilities
Rick Eberle, Chief of Utility Operations, 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
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