



State of Ohio Environmental Protection Agency

Northeast District Office

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

August 14, 2008

RE: LORAIN COUNTY
CITY OF LORAIN BRP WWTP
NPDES NO. OH0026093
OEPA NO. 3PE00005

Mr. Corey Timko, Director
City of Lorain
Municipal Utilities Dept.
1106 First Street
Lorain, OH 44052

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OHIO EPA NEDC

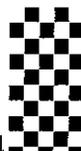
Dear Mr. Timko:

On July 17, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the City of Lorain BRP wastewater treatment plant. Present during the inspection were Messrs. Tony Hoholski, Tony Dore, and Tim Baxter, representing the City of Lorain, and Ms. Jiovanna Toppi, Mr. Rich Blasick, and this writer, representing Ohio EPA.

Evaluated during the inspection were the treatment plant processes, effluent discharge quality, and general compliance with the intent of the NPDES permit. The last CEI conducted at the Lorain BRP WWTP was on May 4, 2006.

At the time of the July 17th inspection, the general operation and maintenance of the plant could be rated as satisfactory, and all treatment processes at the WWTP were in operation.

- Contents of the primary settling tanks were the typical turbid gray, and effluent weirs were clean.
- All of the aeration tanks were in operation, and the contents of the aeration tanks were of the usual rust brown color, with a crisp brown foam. Dissolved oxygen levels are maintained @ 1.8-2.5 ppm, with an MLSS ~2700 ppm. Approximately 250 #/day of ferrous chloride is added to the aeration tanks. One aeration tank blower motor was out of service for repairs.
- The final settling tanks were in use, and effluent from the tanks was clear. A stringy algae was observed on the sides of the settling tanks.
- Chlorination and dechlorination facilities were in operation. Approximately 80 #/day of chlorine is used for disinfection. Sodium bisulfite is used for dechlorination.



- A visual observation of the treatment plant outfall found the effluent to be clear and free of foam or solids. Small fish were seen swimming in the mixing zone where the clear effluent was mixing with the muddy waters of the Black River.
- Raw and waste activated sludge is sent to the sludge thickener. From the thickener the sludge is sent to the primary digester, then secondary digester. Digested sludge is belt filter pressed 5 days/week. Sludge enters the press at 3 to 4% solids, and sludge cake generated is approximately 23% solids.

A review of the Monthly Operating Reports (MORs) submitted for the Lorain BRP WWTP, and covering the period of July 1, 2007 through May 31, 2008, indicates the Lorain Black River WWTP experienced no incidences of noncompliance with its NPDES Permit effluent limits.

A review of the MORs for the same time period did find the following monitoring / frequency reporting violation:

**City of Lorain BRP WWTP
Effluent Frequency Violations
(July 1, 2007 thru July 1, 2008)**

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2008	001	Phosphorus, Total (P)	2/Week	2	1	01/22/2008

Various items discussed with Messrs. Hoholski and Dore included the following:

- 1) Status of the City's mercury variance request, which was submitted to the Ohio EPA in December 2005. The pending variance request has been submitted to Columbus for review and direction, and the City is still awaiting comment.
- 2) Status of the proposed sludge composting facility to be built at the former US Steel property was discussed. Also discussed were current sludge regulations and winter application rules.
- 3) Twice per year the BRP WWTP receives alum sludge from the City water treatment plant. The sludge is pressed and sent to the Allied Waste/BFI Landfill in Oberlin.

- 4) The City's ongoing mercury reduction program was discussed with Mr. Baxter.
- 5) The City pretreatment program was also discussed with Mr. Baxter.
- 6) The City recently conducted the effluent toxicity testing as required by NPDES Permit. However, the control organisms all died, and the test had to be re-run by another lab. Results of all toxicity tests, good and bad, will be forwarded to Ohio EPA.
- 7) The BRP WWTP does not accept hauled waste for treatment.
- 8) An emergency backup generator was installed since the last inspection. The generator has yet to be wired up, however.
- 9) The BRP WWTP employs 30 full time employees, 24/7.
- 10) Mr. Holhoski, who has his Class IV operator's license, indicated he will most likely be retiring within the next 2 years. Please be reminded that the BRP WWTP NPDES Permit requires the plant to be under the supervision of a Class IV operator, and therefore, the City should be planning for replacement of Mr. Hoholski with another licensed Class IV operator immediately upon his retirement.
- 11) Sludge generated and treated at the BRP WWTP is hauled to Medina County for land disposal by Agri Sludge, and is land applied by Albrecht Trucking.
- 12) The City still uses SWIMWARE for submittal of their monthly operating reports. Please be advised the new web-based eDMR (electronic Discharge Monitoring Report) reporting program was recently put online, and the SWIMWARE method of reporting will soon become obsolete. Please contact the eBusiness Center in Columbus for all necessary information required to set up the eDMR account for your facilities. (614-644-3011).
- 13) DMRQA unknown sample results were analyzed by the BRP wastewater lab. Analytical results were within acceptable standards.
- 14) The future relocation of the BRP WWTP to the former US Steel property the City has acquired was discussed.

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- 15) The SSO elimination schedule as contained in the OEPA Director's Findings & Orders was also discussed. A meeting between the Ohio EPA and the City should be held in the near future, to discuss the current status of the WWTP relocation, and the City's plans to meet the remaining scheduled items in the F&Os.

If you have any comments or questions regarding this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

File: Muni/LorainBRP/P&C