



State of Ohio Environmental Protection Agency

Northeast District Office

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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

October 14, 2008

RE: LAKE COUNTY
PAINESVILLE WATER POLLUTION
CONTROL CENTER
COMPLIANCE EVALUATION INSPECTION
NPDES PERMIT NO. OH0026948
OEPA PERMIT NO. 3PD00029

Mr. Randy Bruback, Superintendent
Painesville Water Pollution Control Center
1170 North State Street
P.O. Box 601
Painesville, OH 44077

Dear Mr. Bruback:

On October 9, 2008, this writer, along with Alauddin Alauddin, P.E. of the Division of Environmental and Financial Assistance (DEFA), conducted a compliance evaluation inspection of the Painesville Wastewater Treatment Plant. The purpose of the inspection was to evaluate the wastewater treatment plant's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. Mr. Joe Elliot, Operations Supervisor, represented the city during the inspection.

At the time of inspection, the plant was producing an effluent of satisfactory visual quality in that there was no evidence of suspended solids, floating debris or oil and grease. General operation and maintenance of the grounds and processes were satisfactory.

Other observations noted are:

- The septage receiving station was not operational on this day. Septic haulers were discharging directly into the influent channel.
- One of the grit chamber scrapers was being replaced.
- The influent sampler was very cold. The thermometer in the influent sampler read zero degrees Celsius. According to Mr. Elliot, maintenance had been called to investigate the temperature controls of the unit.

The City of Painesville is scheduled to receive in December of this year, an estimated loan amount of \$3.17 million from DEFA. The loan will be used to upgrade various treatment units and equipment at the plant, including improvements at:

- grit removal system
- primary clarifier mechanisms
- secondary clarifier mechanisms
- tertiary filter media, tertiary filter control system
- standby generators,
- pump station telemetering system
- tertiary screw pumps

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- polymer feed system
- waste activated sludge thickening equipment
- aeration control system

Construction is to commence in January 2009 and will take roughly one year to complete.

A review of our files revealed that you submitted, as requested by this office, an analysis report on the ammonia effluent limitation violation that plagued the city in 2004 and 2007. The report addresses the causes for the violations, the steps taken to identify the causes, the effect of converting the wastewater treatment plant from two-stage nitrification to single-stage nitrification and the operational measures performed to prevent re-occurrence of the violation.

Also submitted to this office were photographs documenting the construction of outfall signage, as required in Part II, AA of the NPDES permit; the "Notification and Reporting Plan" for meeting Part II, F, Sanitary Sewer Overflow Reporting Requirements of the permit; and a copy letter addressed to Gary Stulfauth of Ohio EPA, stating that Enviro Science of Stow Ohio has been retained to meet the Biomonitoring Program Requirements of Part II, V of the NPDES permit.

Part II, BB of your current permit required the re-submittal of a No Exposure Certification form if the city wants to continue to be excluded from needing a stormwater discharge NPDES permit. The Notice of Intent form for a Temporary Discharge that was submitted does not meet the requirements of Part II, BB of the NPDES permit. A new stormwater "No Exposure Certification" form must be submitted every NPDES permit cycle. The form was due March 2008. Information and a link to the No Exposure Certification form can be found at:

http://www.epa.state.oh.us/dsw/storm/ind_noexp_cert.html.

Please immediately submit the No Exposure form to the Division of Surface Water.

A review of the Discharge Monitoring Reports covering the period of March 2007 through September 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Qty	409	488.908	3/15/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	5.0	5.48333	11/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	5.0	16.32	11/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	113	152.197	11/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	5.0	16.2566	11/8/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	113	169.311	11/8/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.5	14.315	11/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	5.0	19.2	11/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	57	148.787	11/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	113	179.132	11/1/2007

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	15.15	10/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	34	209.428	10/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	19.4	10/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	34	158.970	10/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	22.9666	10/8/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	34	221.322	10/8/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	17.445	10/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	12.2633	10/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	23	171.795	10/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	34	97.4582	10/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	7.49	9/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	34	69.0185	9/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	9.58	9/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	34	78.0865	9/15/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.6025	9/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	23	39.8358	9/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.53667	7/22/2007

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring, reporting, or compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

This office has reviewed your report addressing the reasons for the above violations and the corrective action taken. No additional information is requested at this time.

Should you have any questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/mh