



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

November 1, 2010

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 27, 2010, this writer 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. You 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. The bulk of the renovations at the wastewater treatment plant have been completed. The butterfly valves used in the aeration system will be replaced within the next few weeks. Renovations to the SCADA system are in the process of being completed. It is anticipated that the anaerobic sludge heaters may be replaced next year.

During the inspection you stated that you are working on the updating of Operation and Maintenance manual. The manual should reflect the automation of the process units that have occurred as a result of the plant upgrade. Staffing levels should in turn, reflect the updated changes in automation.

A review of the Discharge Monitoring Reports covering the period of October 2009 through September 2010 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	45.25	10/1/2009
001	00530	Total Suspended Solids	30D Qty	273	693.165	10/1/2009
001	00530	Total Suspended Solids	7D Conc	18	153.333	10/22/2009
001	00530	Total Suspended Solids	7D Qty	409	2529.17	10/22/2009

**Northeast District Office**  
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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01119	Copper, Total Recovera	30D Conc	15	66.	11/1/2009
001	01119	Copper, Total Recovera	30D Qty	0.34	.63702	11/1/2009
001	01119	Copper, Total Recovera	1D Conc	34	66.	11/5/2009
001	01119	Copper, Total Recovera	30D Conc	15	32.	4/1/2010
001	01119	Copper, Total Recovera	30D Qty	0.34	.38032	4/1/2010
001	01119	Copper, Total Recovera	1D Conc	34	128.	4/8/2010
001	01119	Copper, Total Recovera	1D Qty	0.77	1.52127	4/8/2010
001	01119	Copper, Total Recovera	30D Conc	15	34.	7/1/2010

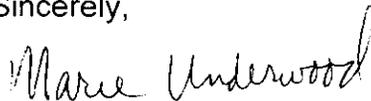
Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring, reporting, or compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

After conducting investigations into the probable cause for the copper effluent limitation violations, you have determined that discharges from your industrial user, Eckart America, L.P., are responsible. You stated that Eckart America has a holding tank that is normally cleaned each year, sending the wastewater to an industrial waste treatment facility. Eckart ceased cleaning the holding tank. This resulted in copper effluent limitation violations at the Painesville Wastewater Treatment Plant. Eckart America has since submitted to you a corrective action plan with a schedule of compliance.

This office has received the responses to the effluent limitation violations cited above. No additional information on the effluent limitation violations 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/mt