



**Environmental
Protection Agency**

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

October 29, 2010

RE: LAKE COUNTY
WILLOUGHBY-EASTLAKE WWTP
COMPLIANCE EVALUATION INSPECTION
NPDES PERMIT NO. OH0028126
OEPA PERMIT NO. 3PD00024

The Honorable David E. Anderson
Mayor, City of Willoughby
City Hall
One Public Square
Willoughby, Ohio 44094

Dear Mayor Anderson:

On October 27, 2010, this writer conducted a Compliance Evaluation Inspection of the Willoughby-Eastlake Water Pollution Control Center (Willoughby-Eastlake WPCC). Mr. John Gorka, Superintendent, represented the city. The inspection was conducted to evaluate the facility's effluent discharge, treatment processes, and general compliance status.

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, processes and equipment were satisfactory. Maintenance work is to be performed of the last remaining of the three final clarifiers.

In his letter to Angelo Tomaselli, Director of Public Service, Dan Bogoevski of this office stated that the City of Willoughby does not meet No Exposure criteria at the Willoughby-Eastlake WPCC because potential exposure to storm water exists during material transfer processes at the plant. Mr. Bogoevski required the elimination of point sources of exposure to storm water at the Willoughby-Eastlake WPCC or the submittal of a Notice of Intent for an Ohio EPA General Storm Water NPDES permit for Industrial Activities. The Willoughby-Eastlake WPCC has chosen to eliminate the point sources of exposure to storm water by directing the storm water flow at the material transfer areas to the wastewater treatment plant sewers. Drains that can discharge contaminated storm water to the wastewater treatment plant have been installed at the ferrous chemical transfer area, bisulfate chemical transfer area and the roadway where dewatered street sweepings are transferred to the dumpster. Also, the sequencing of filling the ash lagoons has been changed so that Lagoon #2 is not filled first, thus preventing windblown dried ash from depositing on the site.

During the inspection, Mr. Gorka stated that CT Consultants is working on the No-Feasible Alternatives Analysis report for plant bypassing. The report must be submitted by February 1, 2011.

THE HONORABLE DAVID E. ANDERSON
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On March 25, 2010, this office received detailed plans for beneficial reuse of incinerator ash. The detail plans have been forwarded to our Columbus office and are being processed.

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

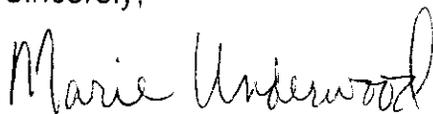
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residu	1D Conc	0.038	.06	9/8/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.32	9/27/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.13	10/2/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.06	5/2/2010
001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	5/4/2010
001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	5/8/2010

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 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:bo

pc: John A. Gorka, Superintendent, Willoughby-Eastlake Water Pollution Control Center