



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

October 9, 2009

**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 September 22, 2009, this writer conducted a Compliance Evaluation Inspection of the Willoughby-Eastlake Wastewater Treatment Plant. 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 free of oil and grease visible; however solids were at times visible, floating in the effluent. Current maintenance work at the plant includes work on one of the three clarifiers. The clarifier drive is being re-built and clarifier components are being painted. Once completed, this work will be repeated on a second clarifier. The bisulfate diffusers were replaced on June 24, 2009. During the inspection it was observed that the refrigeration component for the effluent composite sampler was not operating. The refrigerator was warm and the thermometer had a temperature reading of 21 degrees Celsius. All composited samples must be maintained at a temperature of six degrees Celsius.

On September 15, 2009, this office received an NPDES permit modification form requesting a general mercury variance. The permit modification form will be processed once the Central Office of the Division of Surface Water reviews the mercury variance application.

A review of the Monthly Operating Reports covering the period of January 2008 through September 2009 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	7D Conc	23	24.	2/22/2008
001	00530	Total Suspended Solids	30D Conc	20	32.1666	3/1/2008
001	00530	Total Suspended Solids	30D Qty	722	1364.15	3/1/2008
001	80082	CBOD 5 day	30D Conc	15	24.25	3/1/2008
001	80082	CBOD 5 day	30D Qty	542	1027.90	3/1/2008
001	00665	Phosphorus, Total (P)	30D Qty	36	43.3115	3/1/2008
001	00530	Total Suspended Solids	7D Conc	30	38.6666	3/8/2008
001	00530	Total Suspended Solids	7D Qty	1083	1366.67	3/8/2008

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001	80082	CBOD 5 day	7D Conc	23	27.6666	3/8/2008
001	80082	CBOD 5 day	7D Qty	830	978.291	3/8/2008
001	00530	Total Suspended Solids	7D Conc	30	36.	3/15/2008
001	00530	Total Suspended Solids	7D Qty	1083	1752.76	3/15/2008
001	80082	CBOD 5 day	7D Conc	23	27.6666	3/15/2008
001	80082	CBOD 5 day	7D Qty	830	1346.73	3/15/2008
001	00665	Phosphorus, Total (P)	7D Qty	54	60.0452	3/15/2008
001	00530	Total Suspended Solids	7D Conc	30	34.	3/22/2008
001	00530	Total Suspended Solids	7D Qty	1083	1380.27	3/22/2008
001	80082	CBOD 5 day	7D Conc	23	28.6666	3/22/2008
001	80082	CBOD 5 day	7D Qty	830	1167.54	3/22/2008
001	00719	Cyanide, Free	1D Conc	0.044	.047	3/26/2008
001	00719	Cyanide, Free	1D Qty	1.58	1.91166	3/26/2008
001	00530	Total Suspended Solids	30D Conc	20	35.9166	4/1/2008
001	00530	Total Suspended Solids	7D Conc	30	54.6666	4/1/2008
001	00530	Total Suspended Solids	30D Qty	722	1041.57	4/1/2008
001	00530	Total Suspended Solids	7D Qty	1083	1752.38	4/1/2008
001	80082	CBOD 5 day	30D Conc	15	25.	4/1/2008
001	80082	CBOD 5 day	7D Conc	23	33.6666	4/1/2008
001	80082	CBOD 5 day	30D Qty	542	716.356	4/1/2008
001	80082	CBOD 5 day	7D Qty	830	1065.23	4/1/2008
001	00530	Total Suspended Solids	7D Conc	30	46.	4/8/2008
001	00530	Total Suspended Solids	7D Qty	1083	1353.13	4/8/2008
001	80082	CBOD 5 day	7D Conc	23	31.	4/8/2008
001	80082	CBOD 5 day	7D Qty	830	933.804	4/8/2008
001	00530	Total Suspended Solids	7D Conc	30	31.	4/15/2008
001	80082	CBOD 5 day	7D Conc	23	24.	4/15/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.4	5/2/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	5/3/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	1.81	5/5/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.15	5/9/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.33	5/26/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.1	5/27/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.15	6/12/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.16	6/25/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.14	7/8/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.07	7/16/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.11	9/14/2008
001	50060	Chlorine, Total Residu	1D Conc	0.038	.22	10/15/2008
001	80082	CBOD 5 day	30D Conc	15	15.5384	5/1/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.06	5/14/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	6/15/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.14	6/16/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.1	6/17/2009
001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	6/18/2009
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

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The plant has, at times, been in significant noncompliance of the total chlorine residual effluent limitation during a six month review period, but then returned to compliance the following quarter. Be aware that for a major wastewater treatment plant (i.e., a plant with an average daily design flow of at least 1 MGD), continued significant noncompliance during a six month review period, will lead to automatic enforcement referral of the facility, if the plant fails to return to compliance the following quarter.

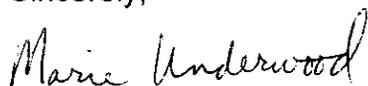
Failure to comply with the effluent limitations or to satisfy the monitoring, reporting, or compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

During the inspection, Mr. Gorka stated that he will have thirty years into the Public Employee Retirement System by December 31, 2009. With this in mind, what steps is the City taking to ensure that a Class IV Operator of record is available to operate the plant when Mr. Gorka decides to retire? The City should consider hiring an Assistant Superintendent well before Mr. Gorka's anticipated retirement date in order to ensure a smooth transition to a Superintendent position.

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. However, within ten days of the date of this letter please provide, in writing, responses to any remaining deficiencies and concerns mentioned in the letter.

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

Sincerely,



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

MU:cl

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