

**Environmental
Protection Agency**

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

May 26, 2010

RE: CUYAHOGA COUNTY ~~WESTERLY~~
NEORSD ~~SOUTHERLY~~ WWTP
NPDES PERMIT NO. OH0024660
OHIO EPA PERMIT NO. 3PE00001
COMPLIANCE EVALUATION INSPECTION

Mr. David McNeeley
Director of Operation & Maintenance
Northeast Ohio Regional Sewer District
3900 Euclid Avenue
Cleveland, OH 44115

Dear Mr. McNeeley:

On April 26, 2010, an inspection was conducted of the Northeast Ohio Regional Sewer District (NEORSD) Westerly Wastewater Treatment Plant (WWTP) by Mr. Dean Stoll and the undersigned. The facility was represented by Messrs. Lawrence Cinadr, Superintendent, John Augustine, Asst. Superintendent, and Terry Robinson, Asst. Superintendent. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the treatment processes, effluent discharge quality, laboratory performance, and biosolids management. Matters related to the facility's biosolids management, however, will not be addressed in this letter.

NPDES Permit Status

The NPDES permit for this facility expired on March 31, 2005. Receipt of a timely renewal application by Ohio EPA on October 4, 2004 authorizes NEORSD to discharge beyond the expiration date.

Facility Description

NEORSD Westerly WWTP serves a population of greater than 100,000 on the west side of Cleveland through a combined sewer system. The facility provides treatment to an average design flow of 35 MGD, with peak capacities of 100 MGD for primary and 70 MGD for secondary treatment. The treatment processes include screening, grit removal, primary settling, a trickling filter/solids contact biological process, final settling, chlorination and dechlorination. The treated effluent is discharged to the Lake Erie outer harbor (> 4,000 ft.) via Outfall 3PE00001001. Waste sludge from the facility is gravity-thickened, mechanically dewatered utilizing centrifuges, and incinerated prior to landfill disposal.

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During excessive wet weather events, flow can be diverted to the Combined Sewer Overflow Treatment Facility (CSOTF). CSOTF provides storage for 6 million gallons and preliminary treatment and settling for up to 300 mgd during wet weather flows. The effluent from the CSOTF is discharged to Lake Erie via NPDES outfall 3PE00001002.

Inspection Findings

At the time of the inspection, the following observations and comments were noted:

1. The facility appeared to be well maintained and operated. All treatment processes necessary for the treatment of dry and wet weather flows were in service. The final effluent at Outfall 001 was visually clear with no observable floating debris or Oil&Grease.
2. Due to wet-weather conditions, flows to the facility were noted to be in excess of 75 MGD at the time of the inspection. Hence, the overflow at CSOTF had been triggered. We understand that approximately 5 MGD discharged to Outfall 002.
3. The hypochlorite system was upgraded during this past "off-season".

Discharge Monitoring Reports (DMR)

Discharge monitoring reports (DMR) received by Ohio EPA for the period January 2007 through April 2010, were reviewed. A summary of the Outfall 001 discharge data is listed in Attachment A. Additionally, the effluent data was reviewed for compliance with the final effluent limitations and monitoring requirements of the NPDES permit. A summary of the specific violations are cited in Attachment B.

Please be advised that any violations referenced herein are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to \$10,000 per day of violation.

If you should have any questions, please contact this office at (330) 963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

cc: Lawrence Cinadr, Superintendent, NEORSD Westerly WWTP

ATTACHMENT A: NEORS WESTERLY OUTFALL 001 EFFLUENT SUMMARY (1/2007 - 3/2010)						
Parameter	Season	Units	# Obs.	Percentiles		Data Range
				50 th	95 th	
Water Temperature	Annual	C	1186	16.1	23.6	7.8-26.7
Dissolved Oxygen	Summer	mg/l	552	7.4	8.8	1.9-9.8
Dissolved Oxygen	Winter	mg/l	634	9.3	10.3	4.7-10.8
Total Suspended Solids	Annual	mg/l	1182	5	10	1-39
Oil and Grease, Hexane Extr Method	Annual	mg/l	86	0	3.95	0-18.7
Nitrogen, Ammonia (NH3)	Summer	mg/l	548	3.97	7.24	0.45-8.84
Nitrogen, Ammonia (NH3)	Winter	mg/l	614	5.9	8.92	0.91-11.4
Nitrite Plus Nitrate, Total	Annual	mg/l	1162	2.59	5.6	0.26-9.56
Phosphorus, Total (P)	Annual	mg/l	1163	0.67	0.87	0.17-1.24
Cyanide, Free	Annual	mg/l	84	0.00255	0.00767	0-0.0136
Nickel, Total Recoverable	Annual	ug/l	167	4.3	7.5	2.4-17
Silver, Total Recoverable	Annual	ug/l	167	0	0.2	0-0.4
Zinc, Total Recoverable	Annual	ug/l	167	22	34.7	11-48.8
Cadmium, Total Recoverable	Annual	ug/l	167	0.1	0.3	0-0.42
Lead, Total Recoverable	Annual	ug/l	167	0	1.1	0-2.4
Chromium, Total Recoverable	Annual	ug/l	167	4.8	8.8	2-12.4
Copper, Total Recoverable	Annual	ug/l	167	8	13.8	2.9-16.3
Chromium, Dissolved Hexavalent	Annual	ug/l	86	3.84	5	0-14.2
Fecal Coliform	Annual	#/100 ml	550	18.5	291	2-5800
Flow Rate	Summer	MGD	552	20.2	49	9.4-66.8
Flow Rate	Winter	MGD	634	25.8	59.8	15.2-83.6
Flow Rate	Annual	MGD	1186	22.9	54.8	9.4-83.6
Chlorine, Total Residual	Annual	mg/l	560	0	0	0-0.037
Acute Toxicity, Ceriodaphnia dubia	Annual	TUa	7	0	0	0-0
Chronic Toxicity, Ceriodaphnia dubia	Annual	TUc	7	0	2.5	0-3.1
Acute Toxicity, Pimephales promelas	Annual	TUa	7	0	0.21	0-0.3
Chronic Toxicity, Pimephales promelas	Annual	TUc	7	0	3.05	0-3.5
pH, Maximum	Annual	S.U.	1186	7.2	7.5	6.8-9.4
pH, Minimum	Annual	S.U.	1186	7	7.3	6.6-7.6
Mercury, Total Recoverable	Annual	ug/l	48	0.00275	0.005	0.0014-0.0085
CBOD 5 day	Summer	mg/l	550	3.4	6	0-10
CBOD 5 day	Winter	mg/l	627	5	7	0-16

ATTACHMENT B: NEORS WESTERLY OUTFALL 001 EFFLUENT VIOLATIONS (1/2007 - 3/2010)						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2008	001	pH, Maximum	1D Conc	9.0	9.4	11/16/2008
June 2009	001	Oil and Grease, Hexane	1D Conc	10	18.7	6/23/2009