



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 5, 2011

RE: LAKE COUNTY
THE LUBRIZOL CORPORATION
PAINESVILLE PLANT
NPDES PERMIT NO. 3II00092

Mr. Kenneth Frato, EHS& S Manager
The Lubrizol Corporation
155 Freedom Road
P.O. Box 428
Painesville, OH 44077-1234

Dear Mr. Frato:

On March 28, 2011, this writer conducted a pre-permit inspection of the Lubrizol Corporation Painesville Plant, in anticipation of the renewal of a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges. You, Ms. Christine Jones (Lubrizol Environmental Assurance Engineer) and Mr. Curt Jerauld (Lubrizol Retiree/Contractor) accompanied this writer during the inspection.

The Painesville Plant of the Lubrizol Corporation is a manufacturer of lubricant additives, fuel additives and other specialty chemicals. The plant has a wastewater pretreatment system for its process water. The pretreated process water and sanitary wastewater are discharged to the City of Painesville Wastewater Treatment Plant (WWTP). The Painesville WWTP has an approved pretreatment program.

The Lubrizol Corporation has five storm water outfalls that discharge to Blackbrook Creek. Outfalls 001 and 002 are storm water discharges associated with industrial activity. The remaining three outfalls (Outfalls 003, 004 and 005) are storm water discharges that are not associated with industrial activity. At the time of the inspection no visual problems were noted at the five outfalls.

Outfall 001 is located along the northern edge of the facility and receives drainage from employee parking lots, administration building, and a shipping warehouse where loading dock activities involving drums and other containers occur.

Outfall 002 is located in the northwest corner of the property and receives drainage from a grassy area, employee parking lots, the administration building area, and the main process operations section of the site. The storm water is conveyed by storm water pipes with strategically located shutoff valves, to a storm water basin. The basin is concrete lined and equipped with an oil skimmer, under-flow weirs and two pumps. The first 30 minute flush of storm water is conveyed to the facility's wastewater pretreatment system where it is ultimately discharged to the City of Painesville collection system. After the initial flush, storm water can be discharged through three optional routes. The flow can continue to be discharged to the pretreatment system, it can bypass the pretreatment system and discharge directly to the City of Painesville sanitary sewer collection system, or the flow can discharge directly to Outfall 002. Direct discharge through Outfall 002 is infrequent.

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The discharges from Outfalls 003, 004 and 005 are not associated with industrial activity and are located in the northwestern section of the property.

This office has yet to receive the required NPDES permit application data for flow-weighted composite samples of the storm water flow from the applicable outfalls. Analytical data for phosphorus, CBOD-5 and total suspended solids was also not included in the application submitted to this office in March 2011. Lubrizol is waiting for the appropriate conditions, namely, conditions whereby a sample is taken during a storm event that is greater than 0.1 inches and at least 72 hours from the previously measurable 0.1 inch rainfall event. Once the analytical data is obtained please immediately submit a modified and updated NPDES permit application.

Be advised that failure to submit a complete NPDES permit renewal application 180 days prior to the expiration of the existing NPDES permit is a violation of Ohio Administrative Code 3745-33-03.

Managerial review of the Storm Water Pollution Prevention (SWPP) Plan is up to date. All required personnel receive annual training on storm water pollution prevention, along with other environmental and safety program training. The SWPP plan, training and employee list receiving the training are kept electronically at the plant.

Once this office receives a complete NPDES permit application, the permit will be drafted soon after. When the draft permit is public noticed, please review it carefully. A thirty-day comment period will be provided. Any questions, comments or concerns regarding the draft permit must be submitted to this district office in writing.

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

cc: Christine Jones, Lubrizol Corp.