



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

January 21, 2009

RE: NPDES PERMIT NO. 3IV00260
LAKE COUNTY WATER PLANT - EAST
LAKE COUNTY
INDUSTRIAL

Mr. Richard V. Douglas, II
Lake County Water Plant - East
1845 Lake Road
Painesville, OH 44077

Dear Mr. Douglas:

On January 14, 2009, this writer conducted a compliance evaluation inspection of the wastewater treatment system serving the above referenced plant. The purpose of the inspection was to evaluate the operation and maintenance condition of the process water treatment system, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. You accompanied this writer during the inspection.

The Lake County Water Plant is a 6 MGD plant that produces potable water for the eastern section of Lake County. Lake Erie is the raw water source. The plant has two outfalls. Outfall 001 is the discharge from the sludge lagoons. Sludge from the sludge storage tank and filter backwash water are discharged to the sludge lagoons where the sludge is settled out and the settled wastewater discharged through Outfall 001. Sludge from the lagoons is eventually dried out and hauled to the Lake County Landfill for disposal. Outfall 002 is the decant water discharge from the sludge storage tank. The sludge storage tank receives its source of flow from the solids that have settled out in the sedimentation basins. At the time of inspection, the system was not discharging.

During the inspection you stated that the county is in the conceptual phase of a possible increase in the amount of potable water generated at the plant. A plant expansion from 6 MGD to 9 MGD is under consideration. If the increase in the amount of potable water results in an increase in pollutant loadings to waters of the state, an Antidegradation review will be required pursuant to Ohio Administrative Code (OAC) 3745-1-05. The NPDES permit would need to be modified. An NPDES Permit Modification Form and Antidegradation Addendum, along with all required information and fees, would need to be submitted to this office at least six months prior to the anticipated date for the increase in the water plant's design flow. Any modifications or additions to be made to the wastewater treatment system will require the submittal of a permit-to-install (PTI) application, PTI fee and detailed design plans, prior to the initiation of construction. All required forms can be obtained from the Ohio EPA, Division of Surface Water Web site at www.epa.state.oh.us/dsw/permits.

A review of the Discharge Monitoring Reports (DMRs) covering June 2005 through December 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	30	45.	3/1/2008
001	00530	Total Suspended Solids	30D Conc	30	43.	12/1/2007
001	00530	Total Suspended Solids	1D Conc	45	75.	2/20/2007
001	00530	Total Suspended Solids	30D Conc	30	40.	2/1/2007

Mr. Richard V. Douglas, II
Lake County Water Plant – East
January 21, 2009
Page 2

The following frequency violations were revealed:

Station	Reporting		Sample			Violation
	Code	Parameter	Frequency	Expected	Reported	Date
001	82080	Trihalomethane, Total	1/Quarter	1	0	06/01/2005
002	82080	Trihalomethane, Total	1/Quarter	1	0	06/01/2005
001	82080	Trihalomethane, Total	1/Quarter	1	0	08/01/2005
002	82080	Trihalomethane, Total	1/Quarter	1	0	08/01/2005
002	82080	Trihalomethane, Total	1/Quarter	1	0	12/01/2005
001	82080	Trihalomethane, Total	1/Quarter	1	0	12/01/2005
001	00665	Phosphorus, Total (P)	1/Month	1	0	10/01/2006
002	00665	Phosphorus, Total (P)	1/Month	1	0	10/01/2006

A review of the DMRs shows that at times, total suspended solids, phosphorous and chlorine residual concentrations are reported as zero when the pollutants are not detected. This is not the correct way to report the concentrations. They should be reported using the applicable data substitution code (A Code). For concentrations that cannot be detected, the AA substitution code (constituting below detectable limit) should be used, while reporting the method detection limit for the test method in the comment section of the form.

Also, as stated in Part III of your NPDES permit a sample frequency with quarterly monitoring means the sampling shall be done in the months of March, June, August and December.

Be advised that failure to comply with the effluent limitations and the terms and conditions of your NPDES permit may be cause for enforcement actions pursuant to Ohio Revised Code 6111.

Please inform this office, in writing, within ten days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

Should you have 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