

**Environmental
Protection Agency**

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

August 6, 2010

RE: NPDES PERMIT 3IF00012
THE LUBRIZOL CORPORATION
WICKLIFFE FACILITY
LAKE COUNTY
INDUSTRIAL

Mr. David B. Skursha
Facility Manager
The Lubrizol Corporation
29400 Lakeland Blvd.
Wickliffe, OH 44092

Dear Mr. Skursha:

On July 28, 2010, this writer conducted a pre-permit inspection of the Wickliffe facility. The inspection was prompted due to the anticipated renewal of the National Pollutant Discharge Elimination System (NPDES) permit. Mr. Greg Taylor, Environmental Assurance Manager and Ms. Sue Scrab, Lab Technician/Environmental Assurance represented Lubrizol Corporation.

The Lubrizol Corporation is a specialty chemical company headquartered in the city of Wickliffe. The Wickliffe facility also serves as the main research center and is engaged primarily in the research, development and testing of lubricant additives, fuel additives and other specialty chemicals.

Sanitary sewage is treated at the City of Euclid Wastewater Treatment Plant. Non-hazardous and hazardous process water is shipped offsite via tank trucks for treatment at commercial facilities. Industrial wastewater consisting of process area storm water is treated onsite and discharged to Lake Erie via a storm sewer. The wastewater treatment system consists of a flow equalization tank and skimmer, stirred neutralization tank, and coalescing separator. The treated wastewater can then flow to two tanks and an oil/water separator before discharging to a storm sewer on Lakeland Boulevard.

At a meeting prior to the inspection, this writer was informed of Lubrizol Corporation's intent to modify the existing process water treatment system that treats the discharge at internal station 601. A modification to the treatment system will require the submittal of a Permit to Install (PTI) application, four sets of detailed design plans, Antidegradation Addendum and the required PTI fee. The PTI and Plan Approval Rules can be found in Ohio Administrative Code 3745-42. All the necessary forms may be obtained at the Division of Surface Water Web site www.epa.ohio.gov/dsw.

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A review of the Discharge Monitoring Reports from March 2005 through June 2010 revealed the following permit limitation violations at Internal Station 601:

Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
00530	Total Suspended Solids	1D Conc	45	120.	6/1/2005
00530	Total Suspended Solids	1D Conc	45	78.	11/16/2005
00530	Total Suspended Solids	1D Qty	18.57	25.2421	11/16/2005
00550	Oil and Grease, Total	1D Conc	15	16.	1/29/2007
00550	Oil and Grease, Total	1D Conc	15	25.	2/7/2007
00550	Oil and Grease, Total	1D Conc	15	30.	2/19/2007
00550	Oil and Grease, Total	30D Conc	10	10.2	2/1/2007
00530	Total Suspended Solids	1D Conc	45	140.	10/13/2006
00310	Biochemical Oxygen Dem	1D Conc	22	40.	10/9/2006
00550	Oil and Grease, Total	1D Conc	15	18.	10/25/2006
00550	Oil and Grease, Total	1D Conc	15	17.	7/5/2006
00550	Oil and Grease, Total	1D Conc	15	19.	3/14/2007
00310	Biochemical Oxygen Dem	1D Conc	22	71.	8/21/2006
00310	Biochemical Oxygen Dem	30D Conc	15	21.	8/1/2006
00550	Oil and Grease, Total	1D Conc	15	16.	10/10/2007
00550	Oil and Grease, Total	1D Conc	15	27.	4/16/2007
00550	Oil and Grease, Total	1D Conc	15	19.	4/18/2007
00550	Oil and Grease, Total	30D Conc	10	10.5	4/1/2007
00530	Total Suspended Solids	1D Conc	45	55.	6/30/2008
00530	Total Suspended Solids	1D Qty	18.57	3507196	8/8/2007
00530	Total Suspended Solids	1D Qty	18.57	1061578	8/20/2007
00530	Total Suspended Solids	1D Qty	18.57	1099958	8/27/2007
00530	Total Suspended Solids	30D Qty	12.38	708591.	8/1/2007
00310	Biochemical Oxygen Dem	1D Qty	9.08	399010.	8/6/2007
00310	Biochemical Oxygen Dem	1D Qty	9.08	828031.	8/20/2007
00310	Biochemical Oxygen Dem	30D Qty	6.19	306760.	8/1/2007
00550	Oil and Grease, Total	1D Conc	15	16.	5/16/2007
61942	pH, Minimum	1D Conc	6.5	6.	5/26/2007
00310	Biochemical Oxygen Dem	30D Conc	15	17.	1/1/2009

The following frequency violations were revealed:

Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
00550	Oil and Grease, Total	2/Week	2	1	04/15/2006
00335	Chemical Oxygen Demand	2/Week	2	1	04/15/2006
00530	Total Suspended Solids	2/Week	2	1	04/15/2006
00530	Total Suspended Solids	2/Week	2	1	06/01/2006
00550	Oil and Grease, Total	2/Week	2	1	06/01/2006

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Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
00335	Chemical Oxygen Demand	2/Week	2	1	06/01/2006
00530	Total Suspended Solids	2/Week	2	1	11/22/2006
00550	Oil and Grease, Total	2/Week	2	1	11/22/2006
00335	Chemical Oxygen Demand	2/Week	2	1	11/22/2006
61941	pH, Maximum	1/Day	1	0	05/31/2007
61942	pH, Minimum	1/Day	1	0	05/31/2007
00530	Total Suspended Solids	2/Week	2	1	11/22/2007
00550	Oil and Grease, Total	2/Week	2	1	11/22/2007
00335	Chemical Oxygen Demand	2/Week	2	1	11/22/2007
00530	Total Suspended Solids	2/Week	2	1	10/22/2008
00550	Oil and Grease, Total	2/Week	2	1	10/22/2008
00335	Chemical Oxygen Demand	2/Week	2	1	10/22/2008

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Your renewal permit will be drafted in the near future. When the draft permit is public noticed, please review it carefully. You will be given a 30-day period to comment on the draft permit. All comments should be sent to this district office.

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