



Environmental Protection Agency

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

March 4, 2011

RE: Lake County
Gary L. Kron Water Reclamation Facility
Pre-permit Inspection
NPDES Permit No. OH0043559
OEPA Permit No. 3PK00033

Mr. Robert Shelby, Director of Wastewater Operations
Lake County Department of Utilities
Administration Center
105 Main Street
P.O. Box 490
Painesville, Ohio 44077

Dear Mr. Shelby:

On March 2, 2011, this writer conducted an inspection of the wastewater treatment plant serving the Gary L. Kron Water Reclamation Facility (GLKWRF). The inspection was prompted by the anticipated renewal of the National Pollutant Discharge Elimination System (NPDES) permit. You and Mr. Michael Melnyk, Assistant Superintendent, represented the county during the inspection.

At the time of inspection, the plant was producing an effluent of satisfactory visual quality in that there was no evidence of suspended solids, floating debris or oil and grease. General operation and maintenance of the grounds, processes and equipment appeared to be satisfactory. However, it was noted that the effluent sample refrigerator was at a temperature of 15 degrees Celsius. The Code of Federal Regulations, 40 CFR 136, requires composite samples to be kept at 6 degrees Celsius.

A review of the Monthly Operating Reports covering the period of February 2009 through January 2011 revealed the following limitation violations:

Table with 7 columns: Station, Reporting Code, Parameter, Limit Type, Limit, Reported Value, Violation Date. Contains 4 rows of violation data.

Please be advised that 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.

In accordance with the existing NPDES permit, this district office received the Sewage Sludge Disposal Annual Report for 2010 on January 27, 2011. On April 29, 2009, this office received written confirmation that the plant is able to meet the e-coli effluent limitation. Be advised that the Sanitary Sewer Overflow Annual Report must be submitted by March 31, 2011.

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A Storm Water General permit was issued for the plant on December 2, 2010.

On November 16, 2010 the director of Ohio EPA granted approval for a 20 hour staffing reduction for the GLKWRF based on staffing levels. The facility is a Class IV wastewater treatment plant. The approval permits Mr. Thomas Hanes, a Class IV wastewater treatment operator, to be the operator in residence at the plant 4 hours per day, 5 days per week.

After reviewing the NPDES permits for the GLKWRF and the Madison plant, this office will require a correction to Item VIII (Operator Information), Form 1 of the NPDES permits for both plants. The operator information the application is referring to is the legal person, firm, public organization, or any other entity which operates the facility. The operator of the facility is the legal entity which controls the facility's operation. In the county's case, the legal entity would be the Lake County Board of Commissioners. The original Form 1 for the two county plants is being returned to you for correction of the name and addresses for Item VIII. Please return the corrected forms as soon as possible to this writer. For additional information, please refer to the Instructions for NPDES permit application Form 1. The NPDES permit application and instructions can be found at www.epa.state.oh/dsw.

The renewal permit will be drafted in the near future. When it is public noticed, please review the permit carefully. A 30-day comment period will be provided. Any questions or comments concerning the draft permit must be submitted in writing to Division of Surface Water Central Office.

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/mt

Enclosures- GLKWR Form 1 and Madison Form 1

cc: Thomas Hanes, Superintendent
Michael Melnyk, Asst. Superintendent