

cc: Dan Eng / MCL / KAC 12/2/08



State of Ohio Environmental Protection Agency
Northeast District Office

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2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
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September 29, 2008

2008 SEP 30 A 7:30 RE:

LORAIN COUNTY
PLUM CREEK WWTP
NPDES NO. 3PG00052

Lorain County Commissioners
Administration Building
216 Middle Avenue
Elyria, OH 44035

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L. UPTON

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2008 OCT -1 PM 10:00
KEN CANNEY
LORAIN COUNTY
SANITARY ENGINEER

Dear Commissioners:

On September 3, 2008, a Compliance Evaluation Inspection (CEI) was conducted on the Plum Creek Wastewater Treatment Plant (WWTP). Present during the inspection were Messrs. Jack Januzzi and Steve Canfield, of the Lorain County Sanitary Engineer's Office; Mr. John Sabo of the Lorain County Health Department; and this writer, of Ohio EPA. The inspection was conducted to ascertain the present operation and maintenance condition of the WWTP, and to evaluate its compliance with the terms and conditions of its NPDES permit.

At the time of the September 3rd inspection, the following observations were made:

- 1) The trash trap was in use and contents were typical. The flow equalization tank was in use and was being well aerated. Contents of the flow equalization tank were turbid gray.
- 2) The extended aeration tank contents were medium brown in color, with no foam present. The suspended solids (MLSS) content appeared to be at a normal operating concentration.
- 3) The settling tank contents were typical, and the mechanical scrapers were operational. Effluent from the settling tank was clear, and there was no solids deposition in the troughs.
- 4) The skimmer line from the settling tank was operating and returning clear water, and the return sludge line was operating and returning brown water.
- 5) The upflow clarifiers were in use.
- 6) Tertiary filtration is accomplished by surface sand filters. The sand filters are comprised of two cells, of which the sand needed raked level in the north cell.
- 7) Final effluent disinfection is accomplished with chlorine tablets, and dechlorination is also by tablets. Tablets for both processes were present in the units.

- 8) The effluent from the WWTP was clear and colorless, and was free of foam.
- 9) The Aerated Sludge Holding tank was approximately half full, was well aerated, and no odors were present.

The last Compliance Evaluation Inspection (CEI) conducted at the Plum Creek WWTP was on June 21, 2007. Since the last CEI, the Plum Creek WWTP has reported the following NPDES Permit effluent violations in their monthly electronic Discharge Monitoring Reports (eDMR):

**PLUM CREEK WWTP
 NPDES PERMIT NO. 3PG00052
 EFFLUENT LIMIT VIOLATIONS**

Parameter	Limit Type	Limit	Reported Value	Violation Date
Fecal Coliform	30D Conc	1000	1300.	7/1/2007
Dissolved Oxygen	1D Conc	5.0	4.94	7/16/2007
Total Suspended Solids	30D Conc	12	12.76	10/1/2007
Total Suspended Solids	7D Conc	18	20.8	10/22/2007
Total Suspended Solids	7D Qty	2.7	3.10188	10/22/2007
Total Suspended Solids	30D Conc	12	15.225	11/1/2007
Total Suspended Solids	7D Conc	18	46.7	11/8/2007
Total Suspended Solids	7D Qty	2.7	6.25729	11/8/2007
CBOD 5 day	7D Conc	15	21.	11/8/2007
CBOD 5 day	7D Qty	2.3	2.81377	11/8/2007
Total Suspended Solids	7D Qty	2.7	3.61127	2/1/2008
CBOD 5 day	7D Qty	2.3	2.91975	2/1/2008
Total Suspended Solids	30D Conc	12	12.726	3/1/2008
Total Suspended Solids	7D Conc	18	42.7	3/1/2008
Total Suspended Solids	30D Qty	1.8	5.15475	3/1/2008
Total Suspended Solids	7D Qty	2.7	18.8771	3/1/2008
CBOD 5 day	7D Qty	2.3	3.09462	3/1/2008

A review of the eDMRs for the same period also found the following monitoring frequency violations:

**PLUM CREEK WWTP
 NPDES PERMIT NO. 3PH00023
 FREQUENCY VIOLATIONS
 (6/1/07 - 9/1/09)**

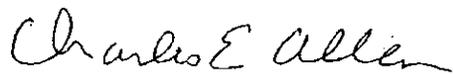
Violation Date	Parameter	Sample Frequency	Expected	Reported
6/15/2007	Nitrogen, Ammonia (NH3-N)	1/2Weeks	1	0

Lorain County Commissioners
Plum Creek WWTP
September 29, 2008
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The County should continue with all efforts that will enable the Plum Creek WWTP to consistently meet its NPDES Permit limits. Please submit a report to this office detailing the reasons for the effluent numeric and frequency violations, and what actions will be taken to prevent further exceedances.

If there are any comments or questions concerning this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

File: MUNI/Lorain/PlumCreek P&C