

**Environmental
Protection Agency**

John E. Kasich, Governor
Robert Taylor, Lt. Governor
Scott J. Smith, Director

August 24, 2011

RE: LORAIN COUNTY
PLUM CREEK WWTP
CEI / NOV
NPDES NO. 3PG00052

CERTIFIED MAIL

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

Dear Commissioners:

On August 11, 2011, a meeting was held at the Lorain County Engineer's Office, with Messrs. Jack Jannuzzi and Steve Hicks, of the Lorain County Engineer's Office; Mr. John Sabo, of the Lorain County Health Department; and this writer, of the Ohio EPA. The purpose of the meeting was to discuss the NPDES permit to discharge compliance status of all four Lorain County owned and operated WWTP's.

Following the meeting, a Compliance Evaluation Inspection (CEI) was conducted on the Plum Creek Wastewater Treatment Plant (WWTP). Present during the Plum Creek WWTP inspection were Mr. Hicks, Mr. Sabo, and this writer.

The August 11th inspection was conducted to evaluate the present operation and maintenance conditions at the WWTP. The last compliance evaluation inspection conducted at the Plum Creek WWTP was on December 9, 2010.

At the time of the August 11th inspection, the following observations were made:

- 1) The flow equalization tank was in operation, and was being well aerated. Contents of the tank were turbid gray,
- 2) Extended aeration tank contents were medium brown in color, and the suspended solids (MLSS) content appeared to be at a higher than normal operating concentration. The return sludge line was operating and returning brown water.
- 3) Settling tank contents were clear, with a slight skim. At the time of the inspection flow was low, and there was no effluent being discharged from the settling tank. Inspection of the effluent troughs found no solids deposition or algal growth in the troughs. Due to the low flow to the plant, the skimmer was adjusted about ¼ inch above the water level.
- 4) Surface sand filters were in use, and contained a slight vegetative growth on the sand. The sand should be kept free of vegetation and solids, and should be raked level.

- 5) Final effluent disinfection is accomplished with chlorine and dechlorination tablet units. At the time of the inspection, both of the units contained tablets. Approximately 12 chlorine tablets, and 8 dechlorination tablets, are used per week.
- 6) At the time of the inspection, there was no effluent being discharged from the WWTP. Water contained in the disinfection tank was clear and colorless, and was free of foam.
- 7) The Aerated Sludge Holding tank was being well aerated, and contained dark brown sludge.
- 8) Flow measurement at the Plum Creek WWTP is obtained from a totalizer on the pump station at the WWTP.

For the time period since the last inspection (December 1, 2010 through August 1, 2011), 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 (Rev. 8/18/11)
 (12/1/10 – 8/1/11)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	Total Suspended Solids	30D Conc	12	15.375	12/1/2010
December 2010	Total Suspended Solids	7D Conc	18	18.8	12/1/2010
December 2010	Total Suspended Solids	7D Conc	18	18.7	12/8/2010
February 2011	Total Suspended Solids	7D Conc	18	21.5	2/22/2011
March 2011	Total Suspended Solids	30D Conc	12	18.36	3/1/2011
March 2011	Total Suspended Solids	7D Conc	18	20.	3/1/2011
March 2011	Total Suspended Solids	30D Qty	1.8	2.59515	3/1/2011
March 2011	Total Suspended Solids	7D Qty	2.7	6.91898	3/1/2011
March 2011	Total Suspended Solids	7D Conc	18	30.7	3/8/2011
March 2011	Total Suspended Solids	7D Qty	2.7	3.53246	3/8/2011
March 2011	CBOD 5 day	7D Conc	15	16.4	3/8/2011
April 2011	Total Suspended Solids	30D Conc	12	15.95	4/1/2011
April 2011	Total Suspended Solids	7D Conc	18	18.4	4/1/2011
April 2011	Total Suspended Solids	30D Qty	1.8	3.7108	4/1/2011
April 2011	Total Suspended Solids	7D Conc	18	36.4	4/22/2011
April 2011	Total Suspended Solids	7D Qty	2.7	10.0988	4/22/2011
May 2011	Total Suspended Solids	30D Conc	12	21.52	5/1/2011
May 2011	Total Suspended Solids	7D Conc	18	34.4	5/1/2011
May 2011	Total Suspended Solids	30D Qty	1.8	2.60513	5/1/2011
May 2011	Total Suspended Solids	7D Qty	2.7	6.28885	5/1/2011

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The means by which an entity in SNC is brought back into compliance, and kept in compliance, is through a Compliance and Enforcement Plan developed by the District Office with jurisdiction over that entity.

SNC is defined by the USEPA as a 40% exceedance of specific conventional pollutant limits (1.4 x parameter effluent limit), or a 20% exceedance of toxic pollutant limits (1.2 x parameter effluent limit), at a given discharge point for any two or more months, during any two consecutive quarter period reviewed.

- a) Conventional pollutants include: BOD/CBOD; total suspended solids; nutrients such as nitrogen (ammonia) and phosphorus; oil & grease.
- b) Toxic pollutants include: total chlorine residual; heavy metals; cyanide.

Utilizing data submitted for the Plum Creek WWTP, the facility is in SNC for total suspended solids. The attached document details the parameters in SNC for the last 6 month period (January 2011 through June 2011).

This correspondence is serving as one of the initial, formal steps in the development of the Compliance and Enforcement Plan for this entity. For violations that are not, or cannot, be resolved within 45 days of the receipt of this letter, a compliance conference should be held between the Ohio EPA District Office and the County Engineer's Office.

The compliance conference meeting is to be held to discuss the facility's violations, and the County's efforts at coming into compliance with its NPDES permit effluent limits. Results of the meeting may require additional enforcement actions be taken by the Ohio EPA should compliance not be attained.

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

cc: Mr. Ken Carney, P.E., County Engineer, Lorain County Engineer's Office

File: MUNI/Lorain/Plum Creek P&C

PLUM CREEK WWTP

NPDES PERMIT NO. 3PG00052

(REV. 8/18/11)

Get Detail
for Selected
Permit

Facilities in Significant Non-Compliance **

Period: Jan-11 Jun-11

Permit #	Facility Name	Major Code	Station Code	Reporting Code	Parameter Name	Limit Type	Limit	Months Significant Exceed	# Months Exceed (2)
3PG00052	Plum Creek WWTP		1	00530	Total Suspended Solids		274	4	5

Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
Plum Creek WWTP	Feb 2011	001	00530	Total Suspended Solids	7D Conc	18	21.5	2/22/2011
Plum Creek WWTP	Mar 2011	001	00530	Total Suspended Solids	7D Conc	18	20.	3/1/2011
Plum Creek WWTP	Mar 2011	001	00530	Total Suspended Solids	30D Conc	12	18.36	3/1/2011
Plum Creek WWTP	Mar 2011	001	00530	Total Suspended Solids	7D Qty	2.7	6.91898	3/1/2011
Plum Creek WWTP	Mar 2011	001	00530	Total Suspended Solids	30D Qty	1.8	2.59515	3/1/2011
Plum Creek WWTP	Mar 2011	001	00530	Total Suspended Solids	7D Qty	2.7	3.53246	3/8/2011
Plum Creek WWTP	Mar 2011	001	00530	Total Suspended Solids	7D Conc	18	30.7	3/8/2011
Plum Creek WWTP	Apr 2011	001	00530	Total Suspended Solids	30D Qty	1.8	3.7108	4/1/2011
Plum Creek WWTP	Apr 2011	001	00530	Total Suspended Solids	30D Conc	12	15.95	4/1/2011
Plum Creek WWTP	Apr 2011	001	00530	Total Suspended Solids	7D Conc	18	18.4	4/1/2011
Plum Creek WWTP	Apr 2011	001	00530	Total Suspended Solids	7D Qty	2.7	10.0988	4/22/2011

Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
Plum Creek WWTP	Apr 2011	001	00530	Total Suspended Solids	7D Conc	18	36.4	4/22/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	30D Conc	12	21.52	5/1/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	7D Qty	2.7	6.28885	5/1/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	30D Qty	1.8	2.60513	5/1/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	7D Conc	18	34.4	5/1/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	7D Qty	2.7	3.96857	5/15/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	7D Conc	18	23.3	5/15/2011
Plum Creek WWTP	May 2011	001	00530	Total Suspended Solids	7D Conc	18	26.9	5/22/2011
Plum Creek WWTP	Jun 2011	001	00530	Total Suspended Solids	30D Conc	12	19.5	6/1/2011
Plum Creek WWTP	Jun 2011	001	00530	Total Suspended Solids	7D Conc	18	40.	6/15/2011
Plum Creek WWTP	Jun 2011	001	00530	Total Suspended Solids	7D Qty	2.7	4.19378	6/15/2011
Plum Creek WWTP	May 2011	001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	2.0	2.635	5/1/2011
Plum Creek WWTP	May 2011	001	00610	Nitrogen, Ammonia (NH3-N)	7D Conc	3.0	4.24	5/8/2011
Plum Creek WWTP	Mar 2011	001	80082	CBOD 5 day	7D Conc	15	16.4	3/8/2011
Plum Creek WWTP	May 2011	001	80082	CBOD 5 day	30D Conc	10	10.2	5/1/2011
Plum Creek WWTP	May 2011	001	80082	CBOD 5 day	7D Qty	2.3	2.33345	5/15/2011