



**Environmental
Protection Agency**

John E. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Kelly, Director

May 29, 2012

RE: LAKE COUNTY
WILLOUGHBY-EASTLAKE WWTP
COMPLIANCE EVALUATION INSPECTION
NPDES PERMIT NO. OH0028126
OEPA PERMIT NO. 3PD00024

The Honorable David E. Anderson
Mayor, City of Willoughby
City Hall
One Public Square
Willoughby, Ohio 44094

Dear Mayor Anderson:

On May 22, 2012, this writer conducted a compliance evaluation inspection of the Willoughby-Eastlake Water Pollution Control Center. Mr. John Gorka, Superintendent, represented the City of Willoughby. The inspection was conducted to evaluate the facility's effluent discharge, treatment processes, and compliance with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

At the time of inspection, a colloidal suspension was visible in the chlorine contact chamber water. Once the effluent crossed over the effluent weir, the suspension tended to break apart. This is the same phenomenon that occurred at the plant in 1997, which Mr. Gorka attributed to the use of ferrous chloride affecting the electrical charge of the effluent. According to Mr. Gorka, the appearance of the colloidal suspension occurs sporadically.

General operation and maintenance of the grounds, processes and equipment were satisfactory. Recent maintenance work that has been performed at the plant include the installation of the Duperon Flexrake, a mechanical rake/bar screen device and associated housing in December 2011, and the rebuilding of three of the four primary effluent pumps in the fall of 2011. The plant's maintenance crew is in the process of lengthening the dried sludge conveyer belt to facilitate the sludge hauling operation that is to commence at the plant. Replacement of the aeration tank diffuser pipes with stainless steel diffuser pipe will commence this spring.

An NPDES permit modification application was submitted to this office on April 2, 2012. The modification request is for the inclusion of monitoring stations for sludge hauling and landfilling. The permit modification is currently under public notice. The public notice period ends June 10, 2012. Any comments or concerns regarding the draft permit modification must be submitted in writing to the Division of Surface Water, Central Office, prior to the June 10, 2012.

In April 2011, this office received the No-Feasible Alternatives Analysis report for plant bypassing. The report is under review. According to Mr. Gorka, plant bypassing occurred eight times in 2009, six times in 2010, thirty-five times in 2011, and so far in 2012 zero times.

The Satellite Sewer Discharge Control Program Report for 2011 was received by this office on January 26, 2012. The Sanitary Sewer Overflow Annual Report was received by this office on February 10, 2012. The Annual Report for the Pollutant Minimization Plan for mercury was received by the Division of Surface Water, Central Office on October 11, 2011.

A review of the Monthly Operating Reports covering the period of October 2010 through April 2012 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Conc	30	35.3333	12/1/2010
001	00719	Cyanide, Free	1D Conc	0.044	.062	12/9/2010
001	00530	Total Suspended Solids	30D Qty	722	793.022	3/1/2011
001	80082	CBOD 5 day	30D Qty	542	550.880	3/1/2011
001	50092	Mercury, Total (Low Level)	30D Conc	5.1	5.89	3/1/2011
001	50092	Mercury, Total (Low Level)	30D Qty	0.0001	.00022	3/1/2011
001	50092	Mercury, Total (Low Level)	30D Conc	5.1	6.535	4/1/2011
001	50060	Chlorine, Total Residual	1D Conc	0.038	.05	5/5/2011
001	00530	Total Suspended Solids	7D Conc	30	36.3333	10/15/2011
001	00530	Total Suspended Solids	7D Qty	1083	1667.24	10/15/2011
001	00530	Total Suspended Solids	30D Conc	20	22.25	12/1/2011
001	00530	Total Suspended Solids	30D Qty	722	843.053	12/1/2011
001	00530	Total Suspended Solids	7D Conc	30	55.	12/22/2011
001	00530	Total Suspended Solids	7D Qty	1083	2176.55	12/22/2011
001	80082	CBOD 5 day	7D Conc	23	28.6666	12/22/2011
001	80082	CBOD 5 day	7D Qty	830	1120.27	12/22/2011

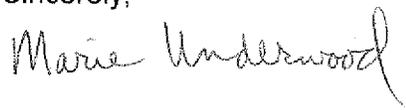
Failure to comply with the effluent limitations or to satisfy the monitoring, reporting, or compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

This office has received the responses to the effluent limitation violations cited above. No additional information on the effluent limitation violations is requested at this time.

The existing NPDES permit application expires December 31, 2013. Be advised that a renewal permit application will be required for submittal 180 days prior to the expiration of the existing permit (i.e. no later than June 30, 2013).

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/cs

cc: John A. Gorka, Superintendent, Willoughby-Eastlake Water Pollution Control Center