



**Environmental
Protection Agency**

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

July 25, 2012

RE: NPDES PERMIT 31F00012
THE LUBRIZOL CORPORATION
WICKLIFFE FACILITY
LAKE COUNTY
INDUSTRIAL

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

Dear Mr. Skursha:

On July 17, 2012, this writer conducted a compliance evaluation inspection of the Wickliffe facility. The purpose of the inspection was to evaluate the facility's compliance status with respect to the effluent limitations and the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. Mr. Greg Taylor, Environmental Assurance Manager and Ms. Suzanne Skrab, Environmental Assurance Engineer 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. Storm water draining from parking lots, roadways and office buildings is discharged through storm sewers (Outfalls 004, 005, 006, 007 and 008) to Lake Erie. Storm water from the process area is treated onsite prior to discharging to Lake Erie via a storm sewer (Outfall 003). At the time of inspection, Outfall 003 was discharging. No visual impacts were observed.

On May 23, 2011, Ohio EPA received a permit-to-install (PTI) application and detailed design plans for the modification of the wastewater treatment system that treats the storm water from the process area. A PTI was issued on June 7, 2011 (PTI No. 812518). The purpose of the modification was to enhance the operation of the system and to redirect the storm water discharge from the process area from Outfall 004 to Outfall 003. The discharge was redirected to Outfall 003 in May 2012 and is reflected in a modification to the NPDES permit (31F00012*ID). Construction of the modified treatment system has commenced and is anticipated to be completed by September 2012.

A review of the Discharge Monitoring Reports from July 2010 through June 2012 revealed the following permit limitation violations at Internal Station 601:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	61941	pH, Maximum	1D Conc	9.0	9.4	1/22/2011
601	61941	pH, Maximum	1D Conc	9.0	10.4	1/23/2011
601	00310	Biochemical Oxygen Dem	1D Conc	22	24.	11/22/2011
601	61941	pH, Maximum	1D Conc	9.0	9.4	3/14/2012
601	61941	pH, Maximum	1D Conc	9.0	9.7	3/15/2012
601	61941	pH, Maximum	1D Conc	9.0	9.3	3/16/2012
601	61941	pH, Maximum	1D Conc	9.0	9.3	3/17/2012
601	61941	pH, Maximum	1D Conc	9.0	9.4	3/19/2012
601	61942	pH, Minimum	1D Conc	6.5	6.47	3/20/2012
601	00310	Biochemical Oxygen Dem	30D Conc	15	18.5	6/1/2012
601	00310	Biochemical Oxygen Dem	1D Conc	22	31.	6/4/2012

The following frequency violations were revealed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	00310	Biochemical Oxygen Dem	1/Week	1	0	11/15/2011
601	00310	Biochemical Oxygen Dem	1/Week	1	0	02/01/2012
601	00310	Biochemical Oxygen Dem	1/Week	1	0	02/15/2012

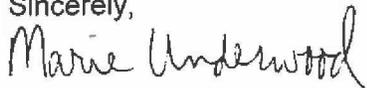
This office received written notification of the violations.

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

During the inspection, Mr. Taylor posed a hypothetical discharge scenario of an accidental release of nontoxic chemicals that have been diluted by the Outfall 003 flow prior to discharging to waters of the state. Lubrizol would need to halt and hold the discharge from Outfall 003. The eventual discharge to waters of the state is not ensured regardless of whether the chemicals are nontoxic and have been diluted. The release must be reported to Ohio EPA and an evaluation on a case-by-case basis would be made, which may include hauling the collected waste to an off-site industrial waste treatment facility. Any discharge of pollutants which Lubrizol Inc. has not revealed on its NPDES permit application and thus has not received permission to discharge is considered an unauthorized discharge of pollutants. Please refer to Ohio Revised Code 6111.04.

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