



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

May 6, 2013

RE: LAKE COUNTY  
 GARY L. KRON WATER RECLAMATION  
 FACILITY  
 NPDES PERMIT NO. OH0043559  
 OEPA PERMIT NO. 3PK00033

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 May 2, 2013, this writer conducted an inspection of the wastewater treatment plant serving the Gary L. Kron Water Reclamation Facility (GLKWRF). The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. Mr. Michael Melnyk, Assistant Superintendent, and Mr. Gary Ondo, Industrial Pretreatment Supervisor, accompanied this writer 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.

A review of the Monthly Operating Reports covering the period of February 2011 through March 2013 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	18	19.3	4/1/2011
001	00530	Total Suspended Solids	30D Qty	1363	2163.96	4/1/2011
001	00530	Total Suspended Solids	7D Conc	27	37.2	4/22/2011
001	00530	Total Suspended Solids	7D Qty	2045	5026.13	4/22/2011
001	00530	Total Suspended Solids	30D Qty	1363	1596.37	5/1/2011
001	00530	Total Suspended Solids	7D Conc	27	41.	5/15/2011
001	00530	Total Suspended Solids	7D Qty	2045	5305.59	5/15/2011
001	00530	Total Suspended Solids	7D Qty	2045	2343.17	8/22/2011
001	00530	Total Suspended Solids	30D Conc	18	57.7142	10/1/2011
001	00530	Total Suspended Solids	30D Qty	1363	7320.51	10/1/2011
001	80082	CBOD 5 day	30D Conc	14	14.9523	10/1/2011
001	80082	CBOD 5 day	30D Qty	1060	1797.04	10/1/2011

001	00530	Total Suspended Solids	7D Conc	27	209.8	10/15/2011
001	00530	Total Suspended Solids	7D Qty	2045	28651.5	10/15/2011
001	80082	CBOD 5 day	7D Conc	21	50.	10/15/2011
001	80082	CBOD 5 day	7D Qty	1590	6740.95	10/15/2011
001	31648	E. coli	30D Conc	126	156.725	8/1/2012
001	31648	E. coli	7D Conc	284	1082.77	8/1/2012
001	50060	Chlorine, Total Residu	1D Conc	0.038	.08	9/21/2012

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31648	E. coli			AK	6/20/2011
001	31648	E. coli			AK	10/30/2012

The data substitution code "AK" is used when the number of bacterial colonies for each dilution tested exceeds the acceptable number of colonies given by the analytical method used. Ohio EPA recommends the use appropriate dilutions to obtain an acceptable count of bacterial colonies when the code is used.

A review of the Discharge Monitoring Reports (DMRs) also reveals that the DMRs have been pinned by Ms. Melanie Rangel, Laboratory Supervisor. While electronic Discharge Monitoring Report (eDMR) allows permitted facilities to enter and submit DMR data, federal and state regulations specify who can legally sign and certify the reports. Please refer to 40 Code of Federal Regulations (CFR) 122.22. Pursuant to the regulations, DMRs can only be signed and certified by a facility's responsible official, i.e. owner, principal executive officer, or ranking elected official or by a duly authorized representative of said official. A duly authorized representative is one who has responsibility for the overall operation of the regulated facility. A laboratory supervisor position does not meet the requirements of a duly authorized representative.

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 Sanitary Sewer Overflow Annual Reports for 2011 and 2012 on March 27, 2012 and March 22, 2013, respectively. Over the past two years, this office has received two verified complaints regarding the sanitary sewer that crosses Mentor Marsh. Ohio EPA legal office is working with the Utilities Department to resolve the latest verified complaint. According to Mr. Melnyk, plant employees have been inspecting the sewer twice per week.

In a letter dated July 30, 2012, the director of Ohio EPA, granted approval for an Ohio Administrative Code, Rule 3745-7-02 (E) exemption request made by Mr. Melnyk. Mr. Melnyk currently holds a Class III wastewater treatment license and has been approved as the person in "responsible charge" of the Gary L. Kron Water Reclamation Facility, a Class IV wastewater facility. Mr. Melnyk was granted approval to proceed with his Class IV certification requirements in a letter dated May 4, 2012 from the Ohio EPA, Division of Drinking and Groundwater. The director of Ohio EPA has granted an exemption, effective July 20, 2014. In addition, Mr. Ondo informed this writer during the inspection that he, too, has commenced the Class IV certification process.

This office has reviewed the reports addressing the reasons for the above violations and the corrective action taken. No additional information is requested at this time.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,

A handwritten signature in cursive script that reads "Marie Underwood".

Marie Underwood, P.E.  
Environmental Engineer  
Division of Surface Water

MU/cs

cc: Michael Melnyk, Asst. Superintendent  
Gary L. Kron, Water Reclamation Facility