



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

July 1, 2013

RE: LAKE COUNTY
WILLOUGHBY-EASTLAKE WWTP
PRE-PERMIT INSPECTION
NPDES PERMIT NO. OH0028126
OHIO EPA PERMIT NO. 3PD00024

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

Dear Mayor Anderson:

On June 26, 2013, this writer conducted a pre-permit inspection of the Willoughby-Eastlake Water Pollution Control Center. Mr. John Gorka, Superintendent and Mr. John Hall, Assistant Superintendent, represented the City of Willoughby. The inspection was prompted by the anticipated renewal of the National Pollutant Discharge Elimination System (NPDES) permit.

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. Operation and maintenance of the wastewater treatment plant (WWTP) was satisfactory. Mr. Gorka has incorporated more automation in the operation of the WWTP. The operation of many plant processes can now be computer controlled by the Supervisory Control and Data Acquisition (SCADA) system. Cameras have been posted at strategic locations throughout the plant allowing operators to view plant processes from an operator control room.

During the inspection, Mr. Gorka questioned the need to maintain an operations log book if operations records are computerized. Pursuant to Ohio Administrative Code (OAC) 3745-7-09, operation and maintenance records shall be accessible onsite for 24-hour inspection by agency or emergency response personnel. Some of the acceptable formats include, but are not limited to, hardbound books with consecutive page numbering, time card, separate operation, and maintenance record, or well organized computer logs. The OAC does not state that the records must be pin protected.

In April 2011, this office received the No-Feasible Alternatives Analysis report for plant bypassing. The report is under review. Nine bypass occurrences were reported during the period of May 2012 through May 2013.

The Satellite Sewer Discharge Control Program Report for 2012 was received by this office on January 29, 2013. The Sanitary Sewer Overflow Annual Report was received by this office on March 1, 2013. Mr Gorka has requested, in writing, a renewal of the general mercury variance.

A review of the Monthly Operating Reports covering the period of May 2012 through May 2013 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00719	Cyanide, Free	1D Conc	0.044	.077	10/4/2012

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.

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

The renewal permit will be drafted in the near future. When it is public noticed, please review the permit carefully. A 30-day comment period will be provided. Any questions or comments concerning the draft permit must be submitted in writing to the Central Office, Division of Surface Water.

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