



December 12, 2023

TRANSMITTED ELECTRONICALLY

Scott Cameron
Avon Lake Environmental Redevelopment Group
LLC
33570 Lake Road
Avon Lake, Ohio 44012

RE: Avon Lake Environmental
Redevelopment Group LLC
Inspection
NPDES
Lorain County
3IB00002

Subject: Ohio Environmental Protection Agency NPDES Inspection

Dear Mr. Cameron:

On October 25, 2023, a Comprehensive Compliance Evaluation Inspection was conducted for the Avon Lake Environmental Redevelopment Group, LLC (ALERG) located at 33570 Lake Road, Lorain County, Ohio. Mr. Ermelindo Gomez, Ms. Vanessa Steigerwald Dick, and Ms. Elizabeth Zoldak represented Ohio EPA during the inspection. Avon Lake Environmental Redevelopment Group, LLC was represented by Mr. Cullen Brown, Environmental Specialist and Mr. Bryan Peter, Environmental Specialist. The last inspection of the facility was conducted on July 24, 2018.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the operation and maintenance of the plant in anticipation of renewing the facility's NPDES permit.

Compliance Review Report

Observations and notations made during the inspection are found on the attached comprehensive desktop compliance review report.

Facility Description

Previously occupying the property was the Avon Lake Generating Station which operated as a steam electric power plant from 1926 until its retirement on April 1, 2022. The plant has been decommissioned is currently being demolished. The property will be redeveloped and its future use still to be determined.

The property on the south side of Lake Road, which formerly operated as the facility's 121-acre coal yard, has undergone extensive clean up and reclamation, removing remaining coal from the site and all existing structures are to be demolished.

Demolition on the north side of the property, previously operating as the plant, is expected to be completed by 2025.

Findings:

1. The current permit expires on December 31, 2023. The application is currently under review.
2. Historically, run-off from the coal yard drained to the coal pile run-off pond, which underwent preliminary treatment (metals removal and pH adjustment) and was monitored at Internal Monitoring Point - Station Number 610 prior to being pumped to the ash settling basins and discharging to Lake Erie via Outfall 002. As part of reclamation, lime stone check dams have been installed in the drainage ditch to the coal ash pond. The coal ash pond has been redesigned and is currently operating as stormwater retention pond. Revisions to Permit to Install (PTI) 1587433 were submitted on November 14, 2023 to remove Station Number 610 from the permit. The PTI is currently under review.
3. In the future, the stormwater retention pond will be constructed to drain to a 108-inch storm drain (managed by the City of Avon Lake) that will discharge to Lake Erie.
4. Ash Settling Basins currently receive flow from Yard Sump 6 (bottom ash sump pits) and Yard Sump 1 (truck wash). The basins are comprised of a primary and secondary settling basin. Flow from the primary basin to the secondary can be manually controlled with plugs. Flow from the secondary settling basin is manually controlled which is then treated with anthracite filters (2) prior to discharging to Lake Erie at Outfall 002.
5. A Mercury effluent limit violation was noted in May 2023 at Outfall 002. No discharge has occurred since that time. Due to the mercury effluent violation ALREG has submitted a PTI (1587433, received October 12, 2023) to modify treatment for this outfall. The PTI is currently under review.
6. Proposed treatment includes a change in filtration, utilizing a 25-micron six (6) bag filter and two (2) carbon filters operating in series. Water will then be tested for compliance and sent to a frac tank where it will be stored prior to discharge, pending sampling results. Should the proposed discharge not meet effluent limits, it will be cycled back to the Ash Settling Basins for additional treatment. If limits are met, water will be discharged to Outfall 002 accordingly.
7. The low volume (oily) waste basin is equipped with a skimmer which removes oil from the basin and is disposed of via totes. Non-oily water flows under a wall in the basin where it is treated by two (2) anthracite filters prior to being discharged to Lake Erie at Outfall 004. Discharge from Outfall 004 is manually controlled.
8. The flow meters are calibrated by the onsite Wastewater Technician. The last calibration February 2022.
9. Discharge was not occurring during the inspection.

Recommendations:

1. Please ensure flow meters are calibrated annually. Documentation of calibration should be maintained onsite.

Avon Lake Environmental Redevelopment Group LLC

Ohio EPA NPDES Inspection

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Ohio EPA sincerely appreciates the cooperation and assistance from Mr. Cullen Brown and Mr. Bryan Peter in conducting this compliance evaluation inspection.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 330-963-1191 or e-mail at elizabeth.zoldak@epa.ohio.gov.

Sincerely,



Elizabeth Zoldak

Environmental Specialist II

Permitting

Division of Surface Water

EZ/al

ec: Chris Moody, Environmental Specialist III, Ohio EPA, NEDO, DSW
Erm Gomes, Specialist III, Ohio EPA, NEDO, DSW
Vanessa Steigerwald Dick, Environmental Specialist III, Ohio EPA, NEDO, DSW
Bryan Peter, Deigan and Associates, LLC – Environmental Specialist
Cullen Brown, Deigan and Associates, LLC – Environmental Specialist
Norman Drivers, Charah Solutions Inc. – Vice President: Environmental, Health & Safety

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING						
Permit #	NPDES #	Inspection Type	Sig. Non-Compliance	Inspection Date	Entry Time	Exit Time
OH0001112	3IB00002	CEI	No	10/26/2023	10:15 AM	12:15 PM

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Avon Lake Environmental Redevelopment Group LLC	12/1/2022
	Permit Expiration Date
	12/31/2023
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Bryan Peter, Environmental Specialist	717-575-1543
Cullen Brown, Environmental Specialist	815-347-5135
Name and Title of Responsible Official	Phone Number
Scott Cameron, Environmental Specialist	502-377-2867

SECTION C: AREAS EVALUATED DURING INSPECTION		
Evaluated? Y-Yes; N-No	Area Evaluated	Recommendations noted in report? Y – Yes; N – No; N/A – Not Applicable
Y	E. NPDES Compliance	N
Y	F. Operations & Maintenance	N
N/A	G. Operator Certification	N/A
N/A	H. Collection System	N/A
N/A	I. Sludge Management	N/A
Y	J. Storm Water	N
Y	K. Self-Monitoring Program	Y
Y	L. Laboratory	N
Y	M. Effluent / Receiving Water Observations	N

**Compliance Data for Avon Lake Environmental Redevelopment Group LLC
between 8/1/2018 and 10/26/2023**

Summary

Permit Effluent Limit Violations: 1

Permit Effluent Code Events: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Milestones Not Entered: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2023	002	Mercury, Total (Low Le	30D Conc	2.6	4.87875	5/1/2023

High Flow Data for Avon Lake Environmental Redevelopment Group LLC between 8/1/2018
and 10/26/2023

Top 10 Flows	
Date	Flows (MGD)
8/7/2021	629.600
11/15/2021	536.900
6/14/2021	533.800
6/30/2021	529.600
5/24/2021	529.600
8/25/2021	529.500
6/29/2021	527.300
8/26/2021	527.000
7/1/2021	526.700
9/21/2021	525.600
Average	254.560

SECTION D: PERMIT VERIFICATION

	Yes	No	N/A
a. Correct name and mailing address of permittee	☒	☐	
b. Correct name and location of receiving waters	☒	☐	
c. Flows and loadings conform with NPDES permit	☒	☐	
d. Treatment processes are as described in permit application	☒	☐	
e. New treatment process added since last inspection	☒	☐	
f. Notification given to State of new, different or increased discharges	☒	☐	☐
g. All discharges are permitted	☒	☐	
h. Number and location of discharge points are as described in permit	☒	☐	☐
i. Are all storm water discharges properly permitted?	☒	☐	
For Industrial Facilities Only			
j. Products and production rates conform with permit application?	☒	☐	☐
k. Do categorical standards apply? If yes, which ones?	N/A		

SECTION E: COMPLIANCE

See previous page for more compliance information.

	Yes	No	N/A
a. NPDES renewal app submitted 180 days prior to expiration	☒	☐	☐
b. Permittee has a compliance schedule	☐	☐	☒
c. Document containing compliance schedule	N/A		
d. Permittee is meeting compliance schedule	☐	☐	☒
e. Any bypasses since last inspection	☐	☒	
f. Regulatory agency notified of all bypasses	☐	☐	☒
g. Permittee or representative reporting all noncompliance per Part III of NPDES	☒	☐	☐

SECTION F: OPERATION AND MAINTENANCE

a. Standby power available	None		
b. Standby power provides power to which treatment components?	N/A		
c. Which treatment components have alarm system available for power or equipment failures?	N/A		
	Yes	No	
d. All treatment units in service other than backup units	☒	☐	
e. Routine and preventative maintenance scheduled and performed	☒	☐	
f. Any major equipment breakdown since last inspection	☐	☒	
g. Operation and maintenance manual provided and maintained	☒	☐	
h. Any operational problems due to influent quality or quantity since last inspection	☐	☒	
i. Are WWTP operations changed during high-flow events?	☐	☒	

SECTION G: OPERATOR CERTIFICATION – Not Applicable

SECTION H: COLLECTION SYSTEM – Not Applicable

SECTION I: SLUDGE MANAGEMENT – Not Applicable

SECTION J: STORMWATER PROGRAM

Industrial Part IV, V, VI

a. What are the SIC code(s)?	8999		
	Yes	No	N/A
b. Does facility's primary SIC code fall under OAC 3745-39-04(B)(14) or does it perform one of the narrative activities?	☐	☒	
c. Permit contains Parts IV, V, VI	☒	☐	☐
d. Does the Sector language address all co-located activities	☒	☐	☐
e. No Exposure Certification Form submitted within last 5 years?	☐	☒	
f. Have they maintained a condition of no exposure of industrial materials or activities to precipitation?	☐	☐	☒

Stormwater Pollution Prevention Plan (SWP3)

	Yes	No	N/A
a. Certification statement signed & dated since most recent modification	☒	☐	
b. List current Pollution Prevention team, w/ names & SWP3 responsibilities	☐	☒	
c. Site map is current, with drainage patterns, storm sewers/outfalls, BMPs, spills/leaks, material handling and storage areas marked	☒	☐	
d. List of all potential pollutant sources	☒	☐	
e. Discusses (with specific BMPs and schedules):			
i. Good Housekeeping	☒	☐	
ii. Preventive Maintenance	☒	☐	
iii. Spill Prevention and Response	☒	☐	
iv. Sediment and Erosion Controls	☒	☐	
f. Non stormwater discharge evaluation performed with date, method, observations, and any corrective actions recorded	☐	☐	
g. Annual Employee Training records includes			
i. petroleum product management,	☐	☐	☒

Stormwater Pollution Prevention Plan (SWP3)	Yes	No	N/A
ii. process chemical management	☐	☐	☒
iii. spill prevention and controls,	☐	☐	☒
iv. fueling procedures	☐	☐	☒
v. general good housekeeping practices	☐	☐	☒
vi. proper procedures for using fertilizer, herbicides and pesticides	☐	☐	☒
vii. Names	☐	☒	
h. Quarterly Inspections (record: date, time, inspector signature, weather, discharges, BMPs needing repair or maintenance, non-compliance)	☒	☐	
i. One during discharge	☐	☒	
ii. Qualified for and used waiver?	☐	☐	☒
i. Annual Comprehensive Evaluation (signed/date/certification)	☐	☐	☒

Monitoring

a. What is facility's plan to take samples within 30 minutes of discharge and 72 hours from previous event?	Discharge controlled. Samples collected when discharging.		
Quarterly Visual Inspections of Discharge	Yes	No	N/A
b. Within 30 min. of discharge & 72 hrs. from previous event	☐	☐	
c. One during snowmelt?	☐	☐	
d. Record: color, odor, clarity, floating solids, settled solids, suspended solids, foam, sheen	☐	☐	
e. Record: date, time, person, runoff/snowmelt, probable contaminant source	☐	☐	
Benchmark Sampling Required for Primary or Co-located Activity			
f. Benchmark sampling conducted, (if required)?	☐	☐	☐
g. Within 30 min. of discharge & 72 hrs. from previous event	☐	☐	☐
h. Benchmark sample taken in each calendar quarter	☐	☐	☐
i. If Benchmark exceeded, has a site & SWP3 review been performed	☐	☐	☐

Comment: Quarterly visual inspection not reviewed.

Implementation (Non-Numeric Effluent Limits)	Yes	No	N/A
a. Minimize Exposure			
i. Salt piles covered or enclosed	☐	☐	☒
ii. BMPs for material transfer areas minimize exposure	☒	☐	☐
iii. Dumpsters/roll-offs covered and/or leak proof	☒	☐	☐
b. Good Housekeeping			
i. Materials orderly and labeled	☒	☐	
ii. Exposed areas clean	☒	☐	
iii. Minimize dust & offsite tracking	☒	☐	
c. All equipment and controls maintained and repaired (including catch basins & storm sewer)	☒	☐	
d. Spill Prevention and Response			
i. Traffic barriers/Secondary containment/Emergency shutoff switch	☒	☐	
ii. Spill response supplies & ER Hotline Number (1-800-282-9378) readily accessible and available?	☒	☐	
e. Sediment & Erosion Controls			
i. Any areas of bare soil or sparse vegetation	☒	☐	
ii. Flow dissipation devices at outfalls and along channels	☒	☐	
f. Runoff Management: Has BMPs to divert, infiltrate, reuse, or otherwise reduce runoff	☒	☐	
g. No discharge of waste / garbage / floatable debris / unpermitted non-storm water discharges?	☒	☐	

SECTION K: SELF-MONITORING PROGRAM

Flow Measurement	Yes	No
a. Actual flow discharged is measured?	☒	☐
b. Flow measurement equipment adequate to handle full range of flows	☒	☐
c. Is the primary flow measuring device calibrated at least annually or in accordance with manufacturers specifications	☒	☐
d. Date of last calibration	February 2022	
e. Who calibrates the flow measuring device?	Onsite Wastewater Technician	
f. Frequency of calibration	Annual	

g. How often is the flow measuring device checked for functionality?	When discharging
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Sampling, Monitoring, and Records	Yes	No	N/A
a. Secondary instruments operated and maintained	☒	☐	
b. Sampling location(s) are as specified by permit	☒	☐	
c. Sampling frequency agree with permit (look at compliance table for frequency violations or missing DMRs)	☒	☐	
d. Are proper sampling methods used (i.e. Oil & Grease collected in a glass container)	☒	☐	
e. Are the proper sampling types used (i.e., Grab, Composite, Flow proportionate, etc.)	☒	☐	
f. Are the field parameters (pH, DO, total residual chlorine, temperature) measured within 15 minutes of collection?	☒	☐	☐
g. Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)	☒	☐	

SECTION L: LABORATORY

Laboratory Name: Alloway Laboratory

Parameter	Analytical testing methods used
Total Suspended Solids	Standard Method 2540D-15
Oil and Grease, Total	EPA 1664A (HEM)
Copper, Total Recoverable	EPA 200.7 Rev. 4.4 or EPA 200.8 Rev. 5.4
Oxidants, Total Residual	Unknown
Mercury, Total (low Level)	EPA 1631E
pH	Standard Method 4500-H B-11
Total Suspended Solids	Standard Method 2540D-15

SECTION M: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
002	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
004	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
610	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A