



September 11, 2026

TRANSMITTED ELECTRONICALLY

Norman Divers, Vice President, Environment, Health & Safety
Charah Solutions, Inc.
4235 South Stream Boulevard, Suite 180
Charlotte, North Carolina 28217

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

Subject: Ohio Environmental Protection Agency NPDES Inspection

Dear Mr. Divers:

On July 14, 2026, a Compliance Evaluation Inspection was conducted by the undersigned at the Avon Lake Environmental Redevelopment Group, LLC (ALERG) facility, located at 33570 Lake Road, Avon Lake, Lorain County, Ohio. ALERG was represented by Mr. Cullen Brown, Environmental Specialist - Deigan and Associates and Mr. Bryan Peter, Environmental Specialist - Deigan and Associates.

The purpose of the inspection was to evaluate the eligibility of the facility for termination of the referenced National Pollutant Discharge Elimination System (NPDES) permit. Photographs taken during the inspection are also attached.

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 facility was sold to ALERG on April 4, 2022.

The property on the south side of Lake Road, which formerly operated as the facility's 121-acre coal yard, has undergone extensive cleanup and reclamation, including removal of any remaining coal and all previously-existing structures. This portion of the property has already been parceled off and sold to Avon Lake Regional Water.

Demolition of the main power plant, located on the north side of Lake Road, was completed on July 1, 2025. The remaining site structures have been demolished except for one (1) of the original smokestacks, the former transformer building, docks, and paved surfaces. The property is surrounded with security fence. Most recently the 43.23-acre site was rezoned to a Special Commerce District by Avon Lake City Council. Specific redevelopment alternatives for the site appear to still be in the planning stages.

Historically, discharge from the ponds was controlled through a pumping process following treatment. All treatment units and pumps were removed in accordance with the approved Permit-to-Install (DSWPTI-250321). To eliminate discharge to the Combined (Primary and Secondary Ponds) and Low Volume (Oily Waste Pond) treatment ponds, all vaults, manholes and auxiliary piping were filled with flowable fill and capped. The ponds were dredged and the excavated sludge was hauled off-site for disposal at a solid waste landfill. The closure report submitted by The Deigan Group detailed that all confirmation samples from the Oily Waste Pond and Secondary Treatment Pond were below the Ohio VAP Standards for Industrial Commercial Property Uses. Two (2) of the seventeen (17) samples collected from the Primary Treatment Pond had detections of Arsenic above the industrial/ commercial standards. These two (2) areas of detection were covered with clean fill soil to eliminate exposure. The Combined treatment ponds were partially graded and backfilled with clean off-site fill to provide gentler bank slopes and promote stability.

Findings and Observations:

At the time of the inspection, the following findings and/or observations were noted:

1. It was confirmed that the former treatment building, all treatment equipment, and pumps were demolished and cleared. The Primary and Secondary Ponds and Oily Waste Pond remain. With the drainageways filled, the ponds solely receive rainwater. The ponds are not able to discharge via outfalls 002 and outfall 004 unless pumped.
2. No discharge was noted from Outfalls 002 and 004.
3. It was observed that the banks of the Primary and Secondary Ponds were graded and stabilized. The fill used for the banks of the ponds appeared to be relatively coarse with pebble and crushed rock, making it difficult to establish grass, particularly on the Secondary Pond which has steeper slopes. There was also some rill erosion occurring around the secondary pond. **Please correct spots where erosion has occurred and reseed barren areas.** Stabilization and vegetation appeared to be successful around the Primary Pond.

Summary:

Based on the inspection findings, this office plans to forward the Termination Request to our Central Office for processing.

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

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Zoldak". The signature is written in a cursive style and is enclosed within a thin blue rectangular border.

Elizabeth Zoldak
Environmental Specialist II
Ohio EPA Division of Surface Water
Northeast District Office

EZ/al

ec: Bryan Peter, Deigan and Associates, LLC – Environmental Specialist,
Cullen Brown, Deigan and Associates, LLC - Environmental Specialist,
Walter Ariss, Ohio EPA, CO – DSW, Manager-Permits Program
Chris Moody, Ohio EPA, NEDO - DSW, Environmental Specialist III

Attachments: Attachment 1: Photograph Log

Attachment 1: Photograph Log

Photograph 1 – Taken By: Elizabeth Zoldak on 07/14/2026	
	Orientation: West
	Description: Secondary Pond

Photograph 2 – Taken By: Elizabeth Zoldak on 07/14/2026



Orientation:

North

Description:

Secondary Pond which would discharge to Outfall 002.

Photograph 3 – Taken By: Elizabeth Zoldak on 07/14/2026



Orientation:

Southwest

Description:

Primary Pond.

Photograph 4 – Taken By: Elizabeth Zoldak on 07/14/2026



Orientation:

Northeast

Description:

Former location of treatment building and Oil Waste Pond.

Photograph 5 – Taken By: Elizabeth Zoldak on 07/14/2026



Orientation:

Southwest

Description:

Overview of rubble and demolished plant.