

**Environmental
Protection Agency**

Governor
Lt. Governor
Director



October 14, 2011

RE: TRUMBULL COUNTY
MECCA TOWNSHIP
CORTLAND MOOSE LODGE
NPDES PERMIT NO. OH0133302
OHIO EPA PERMIT NO. 3PR00340

Mr. William Bartholomew, Administrator
Cortland Moose Lodge 1012
6400 State Route 46
Cortland, Ohio 44410

Dear Mr. Bartholomew:

On October 12, 2011, Ohio EPA conducted an inspection of the wastewater treatment plant (WWTP) located at the above referenced address. The undersigned represented Ohio EPA and you represented the facility. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The current treatment system consists of a trash trap, 1,500 gpd extended aeration activated sludge package plant, final settling tank, slow surface sand filtration, chlorination, and final polishing pond. The final polishing pond discharges to a tributary of Mosquito Creek Reservoir.

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

1. As was documented in Ohio EPA's last inspection letter from December 12, 2008, solids washout to the sand filters continues to be a problem. You indicated during the inspection that solids washouts only occur during periods of high flow. Should the problem persist, the Ohio EPA will require that the facility install a flow equalization tank to protect against these solids washouts.
2. Part II, A of the facility's current NPDES permit requires that the facility Owner designate an Operator of Record with a minimum Class "A" wastewater operator's license. During the inspection, you mentioned that you had obtained a Limited Class "A" license, which is a site-specific license given to individuals with documented experience in operating a specific facility's wastewater treatment works. Please supply to this office, documentation verifying that the Class "A" license was obtained.
3. A leak was observed in the piping inside the sand filter dose tank when the pumps were cycled. Please see to it that this leak is repaired immediately.
4. There was no visit/maintenance log book on site. Bound and numbered log books should be kept on site as a means to record all site visits by maintenance and operating personnel.

- Any and all work or maintenance done at the plant along with any readings that were taken should be recorded in these log books, along with the times of arrival and departure of maintenance personnel. Operation and maintenance personnel should initial each entry.
5. For the periods 11/01/08 – 11/01/09 and 01/01/10 – 08/01/11, the facility reported "AL", or no discharge, for Outfall 001. It is highly unlikely that the polishing lagoon went without a single discharge during these timeframes. Additionally, for the period 12/01/09 – 12/31/09, the facility reported a discharge of 1,500 gpd, which is the approved design flow. For Outfall 001, flows must be a 24-hr total estimate when discharging. Please refer to the Part I, A footnotes for Outfall 001 for a listing of acceptable flow estimation methods.
 6. For the period 09/01/09 – 08/31/11, the flow values for the facility reported in the Electronic Discharge Monitoring Reports (eDMRs) were 1,500 gallons per day, which is the facility's approved design flow. The facility's NPDES permit requires that flow be estimated daily using acceptable engineering practices. Please refer to the Part I, A footnotes for Outfall 602 in the NPDES permit for a listing of acceptable flow estimation methods.
 7. A large amount of plant growth was observed in the final clarifier. Please ensure that the clarifier is kept as clean as possible.
 8. The final effluent being discharged through Outfall 001, while minimal, was clear. No adverse impacts to the receiving stream were observed.

A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period, November 2008 – September 2011 indicated the following violations of the terms and conditions contained in the NPDES permit:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	602	00300	Dissolved Oxygen	1D Conc	6.0	5.3	8/02/2010

During the inspection, you mentioned that you handle the operation and maintenance duties for the plant, and Valley Environmental Labs, Inc. performs the necessary sampling and laboratory analyses. We also understand that Valley Environmental Labs, Inc. is currently submitting the electronic DMRs (eDMRs) for the facility. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 Code of Federal Regulations (CFR) 122.22". 40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

A person is a duly authorized representative if:

- (1) *The authorization is made in writing by a person described in paragraph (a) of this section;*

- (2) *The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and;*
- (3) *The written authorization is submitted to the Director.*

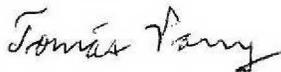
Based on the requirements outlined in 40 CFR 122.22, Valley Environmental Labs, Inc. may not submit eDMR data on behalf of Cortland Moose Lodge 1012.

Please be advised that past or current violations of the terms and conditions of the NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code (ORC). Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office in writing, within 14 days' receipt of this notification, as to the reasons for the above violations and/or deficiencies, and actions that will be undertaken, or have been taken, to remedy them. Your response shall include specific dates for initiation and completion of this action plan.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Attachment: photos

cc: Steve Kramer, R.S., Trumbull County Health Department

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