



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korfeski, Director

Re: Huron County
Norwalk American Legion, Post 41
Notice of Violation (NOV)

April 8, 2010

Mr. Ray Baldwin, Finance Officer
Norwalk American Legion, Post 41
1544 U.S. Route 20 West
Norwalk, Ohio 44857

Dear Mr. Baldwin:

On March 31, 2010, I conducted an inspection of the wastewater treatment plant serving the Norwalk American Legion Post 41. At the time of my inspection the plant was operating, however no effluent was observed being discharged to the river. No samples were taken to verify compliance with permit limits. Our observations and recommendations are as follows:

1. The contents of the aeration tanks were a very light grey color with a layer of foam on the top. The rate of aeration appeared to be adequate. The return sludge line from the clarifier was discharging clear water.
2. The water in the clarifier had light floating solids and the water discharging from the clarifier appeared turbid.
3. The sand filters appeared to be online, however; no discharge to the filters was observed during the inspection. The east bed had significant sludge build up. The inspection log indicated that the west bed had been cleaned and put online on March 25.
4. A one page monthly operations sheet that is maintained by your operator was contained in the control box. In order to comply with record keeping requirements of OAC 3745-7-09 there should be a minimum of the previous three months of operation and maintenance records available for inspection by Ohio EPA at all times. In addition, the rule requires that your operator of record indicate dates and times of arrival and departure on the operations sheet.
5. Our review of the records indicates that your contract operator only visits the plant a few times per month. Please be aware that Part II.A.3 of your NPDES permit requires your operator of record to be physically present at the facility a minimum of 3 days per week for a minimum of 1.5 hours per week. The permit also requires daily inspections of the plant effluent for color, odor and turbidity. This daily visual inspection should be conducted by a member of the legion and recorded on the operation sheet. The member completing the inspection should initial the entry and be sure to indicate the times of arrival and departure.

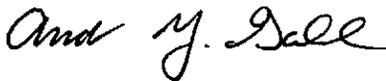
Mr. Ray Baldwin
April 8, 2010
Page Two

6. A review of the February 2010 discharge monitoring report (DMR) shows continued effluent limit violations of the Nitrogen Ammonia (NH₃), CBOD and Total Suspended Solids parameters of your permit. A copy of the violations is enclosed. Your certified operator receives a monthly Preliminary Compliance Report (PCR) email notifying them of the violations. If you would like Ohio EPA to forward a copy of these reports to you please provide us an email address with your written response to this letter. **The facility remains in significant non-compliance and in violation of the NPDES permit.** Please be advised that if these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

7. In a letter from your operator of record dated March 22, 2010, it was indicated that the plant would be pumped out and additional sodium bicarbonate would be added to the plant in order to address the violations. We request that additional follow up information be submitted indicating what portions of the plant were pumped out and where it was hauled. In addition we request information be submitted indicating how much sodium bicarbonate is added to the plant and how often it is added.

Within fourteen (14) days of receiving this inspection letter, please submit a signed and dated written response indicating how the above noted issues will be addressed and what operation improvements can/will be made to attain compliance with permit limits. If you have any questions regarding the inspection or this letter, please contact me at (419) 373-3003 or via email at andrew.gall@epa.state.oh.us

Sincerely,



Andrew Y. Gall
Environmental Specialist II
Division of Surface Water

/lb

Enclosures

pc: Eastwood Environmental w/enclosures
Huron County Health Department

DSW: NWDO: File: [redacted]

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PR00183

Facility Name Norwalk American Legion Expiration Date 3/31/13
 Facility Address 1544 US Rt 20 West Date 3/31 Time 3:00 am
 City Norwalk County Huron Township _____
 Name and Address of Owner SAME

Person Contacted _____ Owner Phone _____

Flow: Design _____ GPD Present _____ GPD (metered - estimated)

Trib. Pop. Varies (actual - estimated) Weather at time of inspection: Temp 70 Sunny

OEPA Personnel Andrew Gall District NWDO

1. Plant Effluent - Mark Severity No.

| No. | Severity Description | No. | Turbidity | No. | Odor | No. | Color |
|-----|----------------------|-----|--------------|-----|--------|-----|------------|
| 0 | None | | Clear | | None | | Colorless |
| 1 | Mild | | | | | | Light Grey |
| 2 | Moderate | | Light Solids | | Musty | | Grey |
| 3 | Serious | | | | | | |
| 4 | Extreme | | Heavy Solids | | Septic | | Black |

2. Effect of effluent on Receiving Stream Name: Not Observed

| No. | Severity Description | No. | Turbidity | No. | Odor | No. | Color |
|-----|----------------------|-----|--------------|-----|--------|-----|-----------|
| 0 | None | | Clear | | None | | Colorless |
| 1 | Mild | | | | | | |
| 2 | Moderate | | Light Solids | | Musty | | Grey |
| 3 | Serious | | | | | | |
| 4 | Extreme | | Heavy Solids | | Septic | | Black |

3. a. Plant has _____ excellent _____ good X fair _____ poor operation
 b. Plant has _____ excellent _____ good X fair _____ poor maintenance
 c. Sand filters have _____ excellent _____ good X fair _____ poor maintenance

Trash Bags Piled in Corner

d. Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/ solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) _____

Disinfection: (Required May 1 thru Oct.31.)

| | | |
|-------|----------|------------------------|
| IN | OUT | |
| _____ | <u>X</u> | Chlorination Tablets |
| _____ | <u>X</u> | Dechlorination Tablets |
| _____ | <u>X</u> | U.V. |

4. X Yes X No Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____
 Chronic Violations X _____ TSS, CBOD, NH3

5. X Adequate plant safety Fenced

6. X Operation and Maintenance Service Name Eastwood

Frequency of Visits 3/15 and 3/25
Added 2 Bags Biocarb

Facility Name: Norwalk American Legion

| Process | # Units | Unit | If Needed - Description and Comments |
|---------------------|---------|--------------------------------------------|-----------------------------------------------------------------------------------|
| Preliminary | 1 | Trash Trap | Pumping Frequency: ^{Plant} Adkins Pumped 3/25 |
| | | Grease Trap | Pumping Frequency: |
| | | Bar Screen | |
| | | Comminutor | |
| | — | Flow Equalization | — |
| Aeration Equipment | 1 | Plant Timer <u>Y</u> X <u>N</u> | Cycle Time: |
| | | Motor/ Blower Unit | Constant On, Diffuser Replaced 3/25 |
| Secondary Treatment | 1 | Aeration Tank | Color: Very Light Grey, Foam Adequate Aeration: <u>Y</u> X <u>N</u> |
| Final Settling | 1 | Clarifier | Light solids, murky |
| | 1 | Sludge Return | In X Out Clear |
| | 1 | Surface Skimmer | In X Out Clear |
| | | Fixed Media Clarifier | |
| Tertiary Treatment | 2 | Surface Sand Filter | Sand bed Switche 3/25 and Cleaned |
| | | Polishing Pond | East bed has sludge Buildup |
| | | Other | |
| Disinfection | 1 | Contact Tank | |
| | 1 | Chlorine Tube Feeder | Offline - Out of Season |
| | 1 | Dechlorination Tube Feeder | Offline - Out of Season |
| | | Ultraviolet (UV) | |
| Flow Metering | | Elapsed Pump Time | |
| | | Recorder. (continuous total) | |
| Pumps | | Raw Wastewater. (type) | |
| | | Sand Filter Effluent Dosing. | |
| Sludge Handling | | Aerated Storage Tank | |
| | | Sludge Drying Bed | |
| Sludge Disposal | | Municipal POTW | |
| | | Landfill | |
| | | Land Application. | |
| Advanced Treatment | | Post Aeration | - No Daily Insp. Logs |
| | | Spray Irrigation | - No Time In Time Out on logs |
| | | Other | |

Detail - Limit Violations

Permit: 2PR00183

Period: 9/1/2009 2/28/2010

| Permit No | Facility | Report Period | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-----------|---------------------------------|---------------|---------|----------------|-------------------------|------------|-------|----------------|----------------|
| 2PR00183 | Norwalk American Legion Post 41 | Feb 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3) | 30D Conc | 3.0 | 38.2 | 2/1/2010 |
| 2PR00183 | Norwalk American Legion Post 41 | Feb 2010 | 001 | 80082 | CBOD 5 day | 30D Conc | 10 | 33. | 2/1/2010 |
| 2PR00183 | Norwalk American Legion Post 41 | Feb 2010 | 001 | 00530 | Total Suspended Solids | 1D Conc | 18 | 48. | 2/26/2010 |
| 2PR00183 | Norwalk American Legion Post 41 | Feb 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3) | 1D Conc | 4.5 | 38.2 | 2/26/2010 |
| 2PR00183 | Norwalk American Legion Post 41 | Feb 2010 | 001 | 80082 | CBOD 5 day | 1D Conc | 15 | 33. | 2/26/2010 |