



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Huron County
Norwalk Elks Lodge No. 730
Notice of Violation (NOV)

October 29, 2008

Mr. Tom Berry, Exalted Ruler
Norwalk Elks Lodge No. 730
2949 US Route 250 South
Norwalk, OH 44857

Dear Mr. Berry:

On October 7, 2008, I conducted an inspection of the wastewater treatment plant serving the Norwalk Elks Lodge. 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 brown with slight foam. The rate of aeration appeared to be adequate.
2. The clarifier contained floating solids. There was some sludge and algae build up in the clarifier weir. The sludge return was clear, indicating that sludge was not being returned to the aeration tank from the clarifier. We suggest that the walls of the clarifier be gently scraped downward to direct the sludge towards the return pump. In addition we recommend that the clarifier effluent weir be cleaned of the sludge build up.
3. The sand filters appeared to be online, however; no discharge to the filters was observed during the inspection.
4. No de-chlorination tablets were in the de-chlorinator. Tablets are required to be in place from May 1 through October 31. This violation has been noted several times during inspections that have been conducted over the past few years. In order to prevent future violations of this requirement we suggest that the lodge inspect the tablet feeders and refill them as part of the daily inspections that are outlined in the operations and maintenance plan that was submitted to our office in November, 2007.

Mr. Tom Berry
October 29, 2008
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5. A log book was not accessible onsite in order to determine compliance with the recordkeeping requirements of Ohio Administrative Code (OAC) Chapter 3745-7-09. A copy of OAC 3745-7-09 is enclosed for your review so that you can begin keeping the necessary records and make them easily accessible onsite for 24 hour inspection by Ohio EPA personnel.

6. A review of the discharge monitoring reports (DMR) shows that your facility continues to have effluent limit violations of the Nitrogen Ammonia (NH₃), CBOD and Total Suspended Solids parameters of your permit. In addition, a DMR was not received for June, 2008. There have also been numerous frequency violations since our last inspection. A copy of the violations is enclosed. The facility is in significant non-compliance and in violation of the NPDES schedule of compliance which required the plant to attain compliance with the final effluent limits no later than 12 months after the effective date of the permit.

Within fourteen (14) days of receiving this inspection letter, please submit a signed and dated written response indicating how the above noted permit violations will be addressed and compliance with final effluent limits will be attained. Please be aware that the response letter is not deemed appropriate unless it is signed and dated. 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

/csl

Enclosures

pc: Uni-Tech Environmental w/enclosures
Huron County Health Department
DSW, NWDO File

Get New Data

Norwalk Elks - Effluent Limit Violation October 2007 - September 2008

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PR00152*BD	October 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.17	10/1/2007
2PR00152*BD	October 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.005	.00664	10/1/2007
2PR00152*BD	November 2007	001	00530	Total Suspended Solids	30D Conc	12	23.	11/1/2007
2PR00152*BD	November 2007	001	00530	Total Suspended Solids	30D Qty	0.07	.13058	11/1/2007
2PR00152*BD	November 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.7	11/1/2007
2PR00152*BD	November 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.017	.03804	11/1/2007
2PR00152*BD	November 2007	001	00530	Total Suspended Solids	1D Conc	18	23.	11/29/2007
2PR00152*BD	November 2007	001	00530	Total Suspended Solids	1D Qty	0.1	.13058	11/29/2007
2PR00152*BD	November 2007	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.7	11/29/2007
2PR00152*BD	November 2007	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.025	.03804	11/29/2007
2PR00152*BD	January 2008	001	00530	Total Suspended Solids	30D Conc	12	16.	1/1/2008
2PR00152*BD	January 2008	001	00530	Total Suspended Solids	30D Qty	0.07	.09084	1/1/2008
2PR00152*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	40.5	1/1/2008
2PR00152*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.017	.22994	1/1/2008
2PR00152*BD	January 2008	001	80082	CBOD 5 day	30D Conc	10	21.	1/1/2008
2PR00152*BD	January 2008	001	80082	CBOD 5 day	30D Qty	0.057	.11923	1/1/2008
2PR00152*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	40.5	1/31/2008
2PR00152*BD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.025	.22994	1/31/2008
2PR00152*BD	January 2008	001	80082	CBOD 5 day	1D Conc	15	21.	1/31/2008
2PR00152*BD	January 2008	001	80082	CBOD 5 day	1D Qty	0.085	.11923	1/31/2008
2PR00152*BD	February 2008	001	00530	Total Suspended Solids	30D Conc	12	33.	2/1/2008
2PR00152*BD	February 2008	001	00530	Total Suspended Solids	30D Qty	0.07	.18736	2/1/2008
2PR00152*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	8.9	2/1/2008
2PR00152*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.017	.05053	2/1/2008
2PR00152*BD	February 2008	001	80082	CBOD 5 day	30D Conc	10	18.	2/1/2008
2PR00152*BD	February 2008	001	80082	CBOD 5 day	30D Qty	0.057	.1022	2/1/2008
2PR00152*BD	February 2008	001	00530	Total Suspended Solids	1D Conc	18	33.	2/27/2008
2PR00152*BD	February 2008	001	00530	Total Suspended Solids	1D Qty	0.1	.18736	2/27/2008
2PR00152*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	8.9	2/27/2008
2PR00152*BD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.025	.05053	2/27/2008
2PR00152*BD	February 2008	001	80082	CBOD 5 day	1D Conc	15	18.	2/27/2008
2PR00152*BD	February 2008	001	80082	CBOD 5 day	1D Qty	0.085	.1022	2/27/2008
2PR00152*BD	May 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.8	5/1/2008
2PR00152*BD	May 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.005	.01022	5/1/2008
2PR00152*BD	May 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	1.8	5/29/2008
2PR00152*BD	May 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.008	.01022	5/29/2008
2PR00152*BD	July 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	6.35	7/1/2008
2PR00152*BD	July 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.005	.03605	7/1/2008
2PR00152*BD	July 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	6.35	7/31/2008
2PR00152*BD	July 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.008	.03605	7/31/2008
2PR00152*BD	August 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.005	.00511	8/1/2008
2PR00152*BD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.08	9/1/2008
2PR00152*BD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.005	.01181	9/1/2008
2PR00152*BD	September 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	2.08	9/25/2008
2PR00152*BD	September 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.008	.01181	9/25/2008

2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/23/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/23/2008
2PR00152*BD	May	2008	001	00010	Water Temperature	1/Day	1	0	05/25/2008
2PR00152*BD	May	2008	001	00083	Color, Severity	1/Day	1	0	05/25/2008
2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/25/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/25/2008
2PR00152*BD	May	2008	001	00010	Water Temperature	1/Day	1	0	05/26/2008
2PR00152*BD	May	2008	001	00083	Color, Severity	1/Day	1	0	05/26/2008
2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/26/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/26/2008
2PR00152*BD	May	2008	001	00010	Water Temperature	1/Day	1	0	05/27/2008
2PR00152*BD	May	2008	001	00083	Color, Severity	1/Day	1	0	05/27/2008
2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/27/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/27/2008
2PR00152*BD	May	2008	001	00010	Water Temperature	1/Day	1	0	05/28/2008
2PR00152*BD	May	2008	001	00083	Color, Severity	1/Day	1	0	05/28/2008
2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/28/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/28/2008
2PR00152*BD	May	2008	001	00010	Water Temperature	1/Day	1	0	05/30/2008
2PR00152*BD	May	2008	001	00083	Color, Severity	1/Day	1	0	05/30/2008
2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/30/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/30/2008
2PR00152*BD	May	2008	001	00010	Water Temperature	1/Day	1	0	05/31/2008
2PR00152*BD	May	2008	001	00083	Color, Severity	1/Day	1	0	05/31/2008
2PR00152*BD	May	2008	001	01330	Odor, Severity	1/Day	1	0	05/31/2008
2PR00152*BD	May	2008	001	01350	Turbidity, Severity	1/Day	1	0	05/31/2008

Recordkeeping requirements and responsibilities of a certified operator.

- (A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment works, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.
- (1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
 - (2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.
 - (3) At a minimum, the following information shall be recorded:
 - (a) Identification of the public water system, sewerage system, or treatment works;
 - (b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
 - (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;
 - (d) Results of tests performed and samples taken, unless documented on a laboratory sheet;
 - (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and
 - (f) Identification of the persons making entries.
 - (4) The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.

(B) A certified operator shall:

- (1) Perform their duties in a responsible and professional manner consistent with standard operating procedures and best management practices;
- (2) Operate and maintain public water systems, sewerage systems, treatment works, and appurtenances so as not to endanger the health or safety of persons working in or around the facility, the public at large, or the environment due to negligence or incompetence; and
- (3) Report all instances of noncompliance with applicable regulations to the operator of record or facility supervisor.

(C) The duties of an operator of record shall include, but not be limited to, those outlined in paragraphs (B)(1) to (B)(3) of this rule and the following additional duties and responsibilities:

- (1) Responsible and effective on site management and supervision of the technical operation of the public water system, treatment works, or sewerage system;
- (2) Immediately notifying the permittee or owner of a public water system, sewerage system, or treatment works, and ensuring the agency and, if applicable, the local regulatory agency, is notified of items that require notification in accordance with sections 6109. or 6111. of the Revised Code, the rules adopted thereunder, or the facility's NPDES permit; and

(D) In the event that there are issues related to paragraphs (A) to (C) of this rule that are within the area of responsibility of, but beyond an operator of record or a certified operator's ability to address, it shall be the operator's responsibility to document any efforts to rectify the problem.

Effective: 12/21/2006

R.C. 119.032 review dates: 12/21/2011

Promulgated Under: 119.03

Statutory Authority: RC Sections 6111.46, 6109.04

Rule Amplifies: RC Sections 6111.46, 6109.04