



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.state.oh.us

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

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

June 5, 2009

Mr. Tom Berry, Exalted Ruler
Norwalk Elks Lodge No. 730
2949 U.S. Route 250 South
Norwalk, Ohio 44857

Dear Mr. Berry:

On May 5, 2009, Ohio EPA representatives Ryan Gierhart and 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, all of the tanks were approximately half full. Based on this fact we assume that the contents of the plant were recently pumped out by a septic hauler. 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 light grey with white foam. The rate of aeration appeared to be adequate.
2. The water level in the clarifier was well below the effluent weir. A layer of scum was floating on top of the water. No discharge was observed from the tank.
3. The sand filters appeared to be online, however; no discharge to the filters was observed during the inspection. Dried solids appeared to have been recently cleaned off of the filters and were piled along the outside of the beds. These solids must be cleaned up and properly disposed of as soon as possible. Please make sure to weigh the solids and report the weight on the 2009 Annual Sewage Sludge Report.
4. The chlorine contact tank was empty and no discharge was observed. You are reminded that chlorine and de-chlorination tablets are required to be in place between May 1 and October 31. Please make sure that the tablets are put in the feeders prior to a discharge occurring from the tank.
5. The Lodge was not open at the time our visit, so we were unable to inspect the daily inspection sheets.

Once again we request that you make provisions to comply with the operator recordkeeping requirements of Ohio Administrative Code (OAC) 3745-7-09(A) which states the following:

(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.

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. A copy of the violations is enclosed. The facility remains 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.

Mr. Tom Berry, Exalted Ruler
June 4, 2009
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Within 14 days of receiving this letter please inform this office in writing as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions. Please be advised that continued failure to comply with the effluent limitations of your NPDES permit will be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111 in order to achieve compliance.

We will await your written response indicating what steps will be taken to address the above noted concerns. Please submit a copy of your response to my attention at: Ohio EPA, Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Please be aware that the response letter is not deemed appropriate unless it is signed and dated.

A copy of our inspection checklist has been included for your review. 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

/llr

Enclosures

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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

NPDES Permit No. 2PR00152

Facility Name Norwalk Elks Lodge Expiration Date _____

Facility Address 2949 US Route 250 S, Norwalk Date 5/5/09 Time 2:30 am 10pm

City Norwalk County Huron Township Norwalk

Name and Address of Owner _____

Person Contacted NONE Owner Phone _____

Flow: Design 1500 GPD Present Unknown GPD (metered - estimated)

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp _____ ° _____

OEPA Personnel Andrew Gall, Ryan Gierhart District NWDO

1. Plant Effluent - Mark Severity No. Not Discharging from Clarifier

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

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

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

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	
_____	_____	Chlorination Tablets <u>Disinfectant</u>
_____	_____	Dechlorination Tablets <u>Tank was</u>
_____	_____	U.V. <u>Empty</u>

Yes No

4. X Compliance with NPDES Permit

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

5. X Adequate plant safety

6. X Operation and Maintenance Service Name Un. - Tech

Frequency of Visits ??

Facility Name: Norwalk Elks Lodge

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	/	Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment		Plant Timer <u>Y</u> X N Motor/ Blower Unit	Cycle Time:
Secondary Treatment	/	Aeration Tank	Color: <u>Grey, white foam</u> <i>Appears to have been upset</i> Adequate Aeration: <u>Y</u> X N <u> </u>
Final Settling	/	Clarifier	<i>Low water level - 1/2 Full plant pumped down completely</i> No Discharge from tank Layer of scum
		Sludge Return	In Out
		Surface Skimmer	In Out
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	<i>Solids buildup raked out and placed next to bed, needs to be cleaned</i>
		Polishing Pond	<i>up and put in dumpster</i>
		Other	
Disinfection	/	Contact Tank	<i>Tank Empty - no Discharge</i>
		Chlorine Tube Feeder	
		Dechlorination Tube Feeder	
		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	
		Spray Irrigation	
		Other	<i>Open Burning / Grass Clippings</i>

Detail - Limit Violations

Permit: 2PR00152

Period: 11/1/2008 4/30/2009

Permit No	Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00530	Total Suspended Sol	30D Qty	0.07	.1022	11/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00530	Total Suspended Sol	30D Conc	12	18.	11/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00610	Nitrogen, Ammonia (30D Conc	3.0	21.6	11/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00610	Nitrogen, Ammonia (30D Qty	0.017	.12263	11/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	80082	CBOD 5 day	30D Conc	10	12.	11/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	80082	CBOD 5 day	30D Qty	0.057	.06813	11/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00530	Total Suspended Sol	1D Qty	0.1	.1022	11/13/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00610	Nitrogen, Ammonia (1D Qty	0.025	.12263	11/13/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Nov 2008	001	00610	Nitrogen, Ammonia (1D Conc	4.5	21.6	11/13/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00530	Total Suspended Sol	30D Qty	0.07	.12491	12/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00530	Total Suspended Sol	30D Conc	12	22.	12/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00610	Nitrogen, Ammonia (30D Conc	3.0	20.	12/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00610	Nitrogen, Ammonia (30D Qty	0.017	.11355	12/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	80082	CBOD 5 day	30D Conc	10	21.	12/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	80082	CBOD 5 day	30D Qty	0.057	.11923	12/1/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00530	Total Suspended Sol	1D Qty	0.1	.12491	12/11/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00530	Total Suspended Sol	1D Conc	18	22.	12/11/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00610	Nitrogen, Ammonia (1D Conc	4.5	20.	12/11/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	00610	Nitrogen, Ammonia (1D Qty	0.025	.11355	12/11/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	80082	CBOD 5 day	1D Conc	15	21.	12/11/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Dec 2008	001	80082	CBOD 5 day	1D Qty	0.085	.11923	12/11/2008
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Jan 2009	001	00530	Total Suspended Sol	30D Conc	12	30.	1/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Jan 2009	001	00530	Total Suspended Sol	30D Qty	0.07	.17033	1/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Jan 2009	001	00530	Total Suspended Sol	1D Conc	18	30.	1/29/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Jan 2009	001	00530	Total Suspended Sol	1D Qty	0.1	.17033	1/29/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00530	Total Suspended Sol	30D Conc	12	38.	2/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00530	Total Suspended Sol	30D Qty	0.07	.21575	2/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00610	Nitrogen, Ammonia (30D Conc	3.0	20.25	2/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00610	Nitrogen, Ammonia (30D Qty	0.017	.11497	2/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00300	Dissolved Oxygen	1D Conc	5.0	4.8	2/26/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00530	Total Suspended Sol	1D Qty	0.1	.21575	2/26/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00530	Total Suspended Sol	1D Conc	18	38.	2/26/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00610	Nitrogen, Ammonia (1D Qty	0.025	.11497	2/26/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2009	001	00610	Nitrogen, Ammonia (1D Conc	4.5	20.25	2/26/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Apr 2009	001	00530	Total Suspended Sol	30D Conc	12	14.	4/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Apr 2009	001	00530	Total Suspended Sol	30D Qty	0.07	.07949	4/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Apr 2009	001	00610	Nitrogen, Ammonia (30D Conc	3.0	4.9	4/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Apr 2009	001	00610	Nitrogen, Ammonia (30D Qty	0.017	.02782	4/1/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Apr 2009	001	00610	Nitrogen, Ammonia (1D Qty	0.025	.02782	4/24/2009
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Apr 2009	001	00610	Nitrogen, Ammonia (1D Conc	4.5	4.9	4/24/2009