



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 Korleski, Director

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

April 8, 2010

Mr. William C. Bennett, Trustee
Norwalk Elks Lodge No. 730
2949 US Route 250 South
Norwalk, OH 44857

Dear Mr. Bennett:

On March 31, 2010, I conducted an inspection of the wastewater treatment plant serving the Norwalk Elks Lodge. At the time of my inspection the plant was operating. 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 grey and a slight musty odor was detected. The rate of aeration appeared to be adequate.
2. The water in the clarifier was grey and murky with a light oil sheen floating on top. This was probably due to grease from the kitchen being discharged to the wastewater treatment system. 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. Some dried solids that have been recently cleaned off of the filters were piled outside of the beds. Please ensure that these solids are cleaned up and properly disposed of as soon as possible. Please make sure to weigh the solids and report the weight on the 2010 Annual Sewage Sludge Report.
4. No discharge was observed from the chlorine contact tank. You are reminded that chlorine and de-chlorination tablets are required to be in place between May 1 and October 31.
5. It was noted that a mailbox has been installed at the plant to house the operation and maintenance log. Please make sure that the arrival and departure times are included in entries made by your operator of record. Although the Lodge was open at the time of our visit, the staff was not able to locate the daily plant inspection sheets so we were unable to review them. Therefore, we request that daily inspection logs also be housed in the mailbox.
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.

Mr. William Bennett
April 8, 2010
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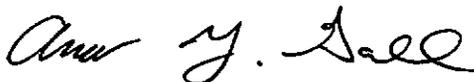
The facility remains in significant non-compliance and in violation of the NPDES schedule of compliance which required the plant to attain compliance with the final effluent limits no later than 12 months after the effective date of the permit. Please be advised that if these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

7. In the response to the March 3, 2010 NOV your operator of record indicated that power outages remain a problem. The operation and maintenance plan that was submitted by Unitech in November, 2007 indicated that daily inspections of the facility will limit "down time" from power outages. Please make sure that the daily inspections are being conducted and documented to ensure that the power is not out and the plant is operating properly.
8. In addition it was indicated that your operator was going to start shutting the plant off when the Lodge is not in use and turning it back on when the Lodge is being used. This type of operation will require significantly more attention from the Lodge and your operator. Given past operation and compliance history we are concerned that this operational method will not improve compliance with permit limits. We strongly recommend that the Lodge install a timer system on the plant in lieu of requiring an operator to be present to turn the plant off and on based on Lodge usage.

We request that 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 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
/lb
Enclosures

pc: Uni-Tech Environmental w/enclosures
Huron County Health Department
~~NWDO-DSW File w/enclosure~~
ec: wcbennett@gmail.com

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 07/31/12
 Facility Address 2949 US Route 250 South Date 9/31/10 Time 2:30 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. _____ (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		<u>None</u>		<u>Colorless</u>
1	Mild						<u>Light Grey</u>
2	Moderate		<u>Light Solids</u>		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 X good _____ 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	
_____	<u>X</u>	Chlorination Tablets
_____	<u>X</u>	Dechlorination Tablets
_____	_____	U.V.

Yes No

4. X Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____
 Chronic Violations X _____ TSS, CBOD₅, NH₃

5. X Adequate plant safety

6. X Operation and Maintenance Service Name Unitech

Frequency of Visits Once/Week

Facility Name: Norwalk Elks Lodge

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment	1	Plant Timer <u>Y</u> X <u>N</u> Motor/ Blower Unit	Cycle Time: <u>On 24 hr 7 days</u>
Secondary Treatment	1	Aeration Tank	Color: <u>Dark Grey - slight Musty odor</u> Adequate Aeration: <u>Y</u> X <u>N</u>
Final Settling	1	Clarifier	<u>Murky, grey, greasy appearance</u>
		Sludge Return	In <u>X</u> Out
		Surface Skimmer	In <u>X</u> Out <u>Set below water line</u>
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	<u>West Filter Online, Solids from</u>
		Polishing Pond	<u>filter should be disposed of properly</u>
		Other	
Disinfection	1	Contact Tank	<u>= Slightly M wtr</u>
	1	Chlorine Tube Feeder	<u>offline - Out of Season</u>
	1	Dechlorination Tube Feeder	<u>offline - Out of Season</u>
		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	<u>→ Lodge Daily Log Not Available</u>
		Spray Irrigation	<u>Mailbox installed @ plant</u>
		Other	<u>ChnTe-6 Onsite 3/6, 3/12, 3/16, 3/25/31</u>

Log for Elks daily readings
should be in notebook

need to include arrival and departure

Detail - Limit Violations

Permit: 2PR00152

Period: 2/1/2010 2/28/2010

Permit No	Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00530	Total Suspended Solids	30D Qty	0.07	.19871	2/1/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00530	Total Suspended Solids	30D Conc	12	35.	2/1/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.017	.14194	2/1/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	25.	2/1/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	80082	CBOD 5 day	30D Qty	0.057	.06245	2/1/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	80082	CBOD 5 day	30D Conc	10	11.	2/1/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00530	Total Suspended Solids	1D Conc	18	35.	2/24/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00530	Total Suspended Solids	1D Qty	0.1	.19871	2/24/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.025	.14194	2/24/2010
2PR00152*BD	Norwalk Elks Lodge No 730 #2	Feb 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	25.	2/24/2010