

**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

April 20, 2011

RE: KEIM LUMBER  
NPDES PERMIT NO. 3PR00408  
FFY 2011 CEI

Mr. Leroy J. Yoder  
Keim Lumber  
4465 SR 557  
Charm, OH 44617

Mr. Yoder:

On March 22, 2011, this writer along with Keith Kroeger conducted an inspection of the treatment system for Keim Lumber. Possible upgrades to the Orenco system were also discussed during a conference call with representatives from Orenco.

Observations:

Following are observations made during the inspection.

1. One recirculation pump was out of service at the time of the inspection. You indicated that the pump was on order. It is understood that the pump has since been replaced. As a result of the failed system, it was the understanding of this writer that the pressure at the spray tips of the nozzles was relatively low.
2. The blower unit was out of service at the time of the inspection. It was understood that the unit was also on back order. A representative of Orenco confirmed that both the blowers and the pump were on order. It is understood that the blower has also since been replaced.

It is unknown when the blower unit failed. It was stated by representatives of Orenco that this unit was important for efficient operation of the treatment system.

3. Both the blower and the pump appear to be critical for operation of the treatment system. As critical parts, an extra pump and blower should be maintained on-site along with any other spare parts identified by Orenco as critical for operations.
4. A few weeks ago it was noticed that the effluent ammonia levels began to increase over the past few months. It was understood that a check of the system found that sludge had accumulated to the recirculation pump in the recirculation tank. Because of this, the sludge was being transferred to the fabric system. It is believed that this caused the increase in effluent ammonia concentrations.

In response, you took steps to clean the system and remove the accumulated solids. It was stated that the effluent ammonia levels were still elevated and that the system is still recovering. You also indicated that you are monitoring the system in an effort to establish pumping frequency for the tank.

5. It appeared that several of the spray heads were partially plugged. The wastewater did not appear as though it was being evenly distributed across the fabric. Uneven distribution of the wastewater across the fabric could reduce the efficiency of the system.
6. The fabric did not appear to be as heavily covered with the brown growth as in past inspections. You indicated that a few weeks ago, you had cleaned the system and added an orange solution to control the worms that populate the system. You also have available a new tool to clean the fabric.
7. The recirculation rates should be checked to make sure they are set to optimize the system. The recirculation rates can have a significant impact on the effectiveness of the system.

#### Conference Call:

Following the inspection, a conference call was held with representatives of Orenco. We discussed plans they were considering for upgrade of the system. At the time, they were putting together a report for our review. The report was to provide a proposal to upgrade the system and background information to support the proposal. The report is currently under review by this office.

#### Draft NPDES:

An NPDES Permit has been recently drafted for the Keim Lumber wastewater treatment system. Included in the permit is a schedule to upgrade the system so that the system can consistently comply with the discharge limits. The schedule is intended to give Keim Lumber sufficient time to complete the necessary upgrades. The draft NPDES Permit should be thoroughly reviewed when received so that any questions can be addressed during the 30-day draft period.

#### Compliance Review:

A compliance review of the treatment system was conducted as part of this inspection. The period of review was January 2010 through February 2011. Following are violations reported during the review period.

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2010	Nitrogen, Ammonia	30D Conc	3.0	19.6	1/1/2010
January 2010	Nitrogen, Ammonia	30D Qty	0.079	.17063	1/1/2010
January 2010	CBOD 5 day	30D Conc	10	17.	1/1/2010
January 2010	Nitrogen, Ammonia	7D Conc	4.5	19.6	1/8/2010
January 2010	Nitrogen, Ammonia	7D Qty	0.12	.17063	1/8/2010
January 2010	CBOD 5 day	7D Conc	15	17.	1/8/2010
February 2010	Nitrogen, Ammonia	30D Conc	3.0	44.3	2/1/2010
February 2010	Nitrogen, Ammonia	30D Qty	0.079	.25151	2/1/2010
February 2010	CBOD 5 day	30D Conc	10	12.	2/1/2010
February 2010	Nitrogen, Ammonia	7D Conc	4.5	44.3	2/8/2010
February 2010	Nitrogen, Ammonia	7D Qty	0.12	.25151	2/8/2010
March 2010	Total Suspended Solids	30D Conc	12	20.	3/1/2010
March 2010	Nitrogen, Ammonia	30D Conc	3.0	17.3	3/1/2010
March 2010	Nitrogen, Ammonia	30D Qty	0.079	.1768	3/1/2010
March 2010	Total Suspended Solids	7D Conc	18	20.	3/8/2010
March 2010	Nitrogen, Ammonia	7D Conc	4.5	17.3	3/8/2010
March 2010	Nitrogen, Ammonia	7D Qty	0.12	.1768	3/8/2010
May 2010	Total Suspended Solids	30D Conc	12	17.	5/1/2010
May 2010	Nitrogen, Ammonia	30D Conc	1.0	12.4	5/1/2010
May 2010	Nitrogen, Ammonia	30D Qty	0.026	.09387	5/1/2010
May 2010	Fecal Coliform	30D Conc	1000	2900.	5/1/2010
May 2010	Nitrogen, Ammonia	7D Conc	1.5	12.4	5/8/2010
May 2010	Nitrogen, Ammonia	7D Qty	0.04	.09387	5/8/2010
May 2010	Fecal Coliform	7D Conc	2000	2900.	5/8/2010
June 2010	Nitrogen, Ammonia	30D Conc	1.0	2.47	6/1/2010
June 2010	Fecal Coliform	30D Conc	1000	5400.	6/1/2010
June 2010	Dissolved Oxygen	1D Conc	6.0	5.67	6/1/2010
June 2010	Nitrogen, Ammonia	7D Conc	1.5	2.47	6/8/2010
June 2010	Fecal Coliform	7D Conc	2000	5400.	6/8/2010
July 2010	Nitrogen, Ammonia	30D Conc	1.0	1.34	7/1/2010
July 2010	Fecal Coliform	30D Conc	1000	2300.	7/1/2010
July 2010	Fecal Coliform	7D Conc	2000	2300.	7/8/2010
July 2010	Dissolved Oxygen	1D Conc	6.0	5.07	7/13/2010
July 2010	Dissolved Oxygen	1D Conc	6.0	5.27	7/27/2010
August 2010	Nitrogen, Ammonia	30D Conc	1.0	8.98	8/1/2010
August 2010	Fecal Coliform	30D Conc	1000	8500.	8/1/2010
August 2010	Nitrogen, Ammonia	7D Conc	1.5	8.98	8/8/2010
August 2010	Fecal Coliform	7D Conc	2000	8500.	8/8/2010
August 2010	Dissolved Oxygen	1D Conc	6.0	5.91	8/10/2010
August 2010	Dissolved Oxygen	1D Conc	6.0	5.89	8/17/2010
September 2010	Total Suspended Solids	30D Conc	12	15.	9/1/2010
October 2010	Total Suspended Solids	30D Conc	12	15.	10/1/2010
October 2010	Nitrogen, Ammonia	30D Conc	1.0	12.5	10/1/2010

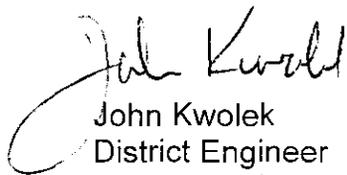
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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2010	Fecal Coliform	30D Conc	1000	3900.	10/1/2010
October 2010	Nitrogen, Ammonia	7D Conc	1.5	12.5	10/8/2010
October 2010	Fecal Coliform	7D Conc	2000	3900.	10/8/2010
November 2010	Total Suspended Solids	30D Conc	12	16.	11/1/2010
November 2010	Nitrogen, Ammonia	30D Conc	3.0	25.	11/1/2010
November 2010	Nitrogen, Ammonia	7D Conc	4.5	25.	11/8/2010
November 2010	pH	1D Conc	6.5	6.4	11/16/2010
December 2010	Nitrogen, Ammonia	30D Conc	3.0	43.5	12/1/2010
December 2010	pH	1D Conc	6.5	6.4	12/7/2010
December 2010	Nitrogen, Ammonia	7D Conc	4.5	43.5	12/8/2010
January 2011	Nitrogen, Ammonia	30D Conc	3.0	35.1	1/1/2011
January 2011	Nitrogen, Ammonia	7D Conc	4.5	35.1	1/8/2011

The data demonstrates that Keim Lumber is in Significant Noncompliance (SNC) with the NPDES Permit. It is important that we continue to discuss the wastewater treatment system and to come up with solutions to the compliance problems in the very near future.

You may contact this writer at (330) 963-1251 or at [john.kwolek@epa.state.oh.us](mailto:john.kwolek@epa.state.oh.us) to discuss any questions you may have.

Respectfully,



John Kwolek  
District Engineer  
Division of Surface Water

JK/mt