



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 27, 2008

RE: LAKE COUNTY
MADISONTOWNSHIP
STEWART LODGE
NPDES PERMIT NO. 3PR00332
APPLICATION NO. OH0133132

NOTICE OF VIOLATION

Mr. John Dalsky, Administrator
Stewart Lodge
7774 Warner Drive
Madison, OH 44057

Dear Mr. Dalsky:

On June 17, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves Stewart Lodge. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. Mr. Robert Fobes, of the Maintenance Department, was present during the inspection, performing operation and maintenance work at the plant.

At the time of inspection the plant was producing an effluent free of suspended solids, debris, and oil and grease. The following observations were noted:

- The flow equalization tank was in operation. The belt on the flow equalization blower had just been replaced by Mr. Fobes.
- The aeration tank was in operation. The mixed liquor suspended solids concentration appeared high.
- The settling tank was very turbid. The tank contents had been agitated. Mr. Fobes had just wasted sludge to the sludge holding tank. An excessive amount of sludge was accumulated behind the baffles of the aeration tank. The accumulated sludge behind the baffles must be removed.
- Each of the filter beds had an excessive amount of sludge, twigs and leaves on its surface. The filter sand was not spread level across the surface. The sludge, debris and solids laden sand must be removed and replaced with clean sand. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on both beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed.
- The chlorinator and dechlorinator contained chlorine tablets and sulfite tablets, respectively.
- An excessive amount of grass clippings was contained in the chlorine contact chamber. The clippings should be removed and care must be taken when cutting the grass to prevent the clippings from entering the chamber.

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- The sludge holding tank contained sludge that was being aerated at the time. Mr. Fobes stated that he does not normally aerate the sludge holding tank. Be advised that the sludge holding tank must be aerated at all times, in accordance with the PTI that was issued by this Agency.
- The plant grounds, as a whole, were in marginal condition. Excessive clutter, debris and unused equipment litter the plant grounds. The clutter and debris should be removed in order to provide a clutter-free and safe area for your operator of record to perform his duties.

The above referenced items must be corrected immediately.

A review of the discharge monitoring reports covering the period of April 2007 through April 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia-NH3	30D Conc	1.0	1.12	6/1/2007
001	00610	Nitrogen, Ammonia-NH3	30D Qty	0.021	.02365	6/1/2007
001	00530	Total Suspended Solids	30D Conc	12	21.	8/1/2007
001	00530	Total Suspended Solids	7D Conc	18	21.	8/8/2007

The average daily design flow of the wastewater treatment plant continues to be reported on the discharge monitoring reports as the daily estimated flow. This practice must cease. As stated on Page 2 of your NPDES permit, acceptable methods for estimating daily flow at plants are, in order of preference: 1) elapsed time meters on sand filter dosing pumps; 2) elapsed time meters on influent pumps; or 3) water use records.

Also, this Agency has not received the discharge monitoring reports for May 2008. As stated in Part III of your NPDES permit, monitoring data that is submitted electronically must be transmitted to Ohio EPA by the 20th day of the month following the month-of-interest. Monitoring data that is submitted in the hardcopy format on Ohio EPA 4500 report forms are to be received no later than the 15th day of the month following the month-of-interest.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code Chapter 6111.

This writer was unable to determine the location of the operation and maintenance record, required pursuant to Ohio Administrative Code (OAC) 3745-7-09 and described in this writer's letter dated April, 2007. Please notify this office, in writing, of the location of the operation and maintenance record. At a minimum, the log book must contain:

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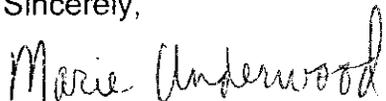
1. The identification of the sewage treatment works;
2. Date and times of arrival and departure for the operator of record and any other operator required by the administrative code.
3. Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced;
4. Results of tests performed and samples taken, unless documented on a laboratory sheet;
5. 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 conveyed, effluent produced; and
6. Identification of the persons making entries.

The administrative code must be carefully reviewed for information on all requirements.

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/mt