



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

February 14, 2008

RE: LORAIN COUNTY
ELYRIA TOWNSHIP
ELYRIA MOTEL WWTP
(NPDES NO. OH0125806
OHIO EPA NO. 3PT00191)

Mr. Hetal Patel, Owner
Elyria Motel
701 Oberlin Road
Elyria, OH 44035

Dear Mr. Patel:

On February 7, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the Elyria Motel wastewater treatment plant (WWTP) located at 701 Oberlin Road. The purpose of the inspection was to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits, as well as the terms and conditions of the permit.

At the time of the February 7th inspection, maintenance of the plant could be rated as satisfactory. However, based upon analytical data submitted to Ohio EPA, overall operation of the plant could be rated as marginal.

The following items were observed at the Elyria Motel WWTP on February 7, 2008:

- 1) The trash trap was in use and contents were typical. The trash trap had been pumped out in November 2007. As you indicated, the trash trap is pumped out every 6 months.
- 2) The extended aeration tank contents were medium brown in color, and were being well aerated. The suspended solids concentration (MLSS) in the aeration process appeared to be at a satisfactory level, and the return activated sludge (RAS) line was operational. There was no foam present on the surface of the aeration tank contents.
- 3) Settling tank contents were also typical. The skimmer was operating and there were no floating solids on the surface of the water. The effluent trough was clean and free of solids.
- 4) The dosing station pumps were both operational, and the high level alarm light worked when tested.
- 5) The surface sand filters consist of two cells. The west cell was in use at the time of the inspection, and the east cell was free of water and solids. Sand in the filters was replaced in October 2007, with sand purchased at Best Sand.
- 6) The leaking sand filter distribution box was replaced this past summer (2007) with a new concrete box.

- 7) The tablet chlorination/dechlorination unit was not in use, as the required disinfection season was over on November 1st. Three of four tablet tubes were missing a cap, and will need to be replaced prior to being put back into service.

According to our files, the last Compliance Evaluation Inspection (CEI) conducted at the Elyria Motel WWTP was on November 28, 2006. A review of the Monthly Operating Reports (MOR's) submitted for the WWTP since our last inspection found the following final effluent limit numeric violations (January 1, 2006, through February 1, 2008):

ELYRIA MOTEL WWTP
NPDES EFFLUENT LIMIT VIOLATIONS
 (January 1, 2006 through February 1, 2008)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	20.	8/22/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	0.01	.09084	8/22/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	21.	8/15/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	0.01	.09538	8/15/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	10.56	8/8/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	0.01	.04796	8/8/2007
August 2007	Fecal Coliform	7D Conc	2000	2000.	8/8/2007
August 2007	Dissolved Oxygen	1D Conc	6.0	5.7	8/8/2007
August 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	16.424	8/1/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	20.	8/1/2007
August 2007	Nitrogen, Ammonia (NH3-N)	30D Qty	0.01	.0746	8/1/2007
August 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	0.01	.09084	8/1/2007
August 2007	Fecal Coliform	30D Conc	1000	2000.	8/1/2007
March 2007	Total Suspended Solids	30D Conc	12	20.	3/1/2007
March 2007	Total Suspended Solids	7D Conc	18	20.	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	13.9	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	13.9	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	30D Qty	0.02	.0544	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	0.03	.0544	3/1/2007
December 2006	Total Suspended Solids	7D Conc	18	23.	12/8/2006
December 2006	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	13.5	12/8/2006
December 2006	Nitrogen, Ammonia (NH3-N)	7D Qty	0.03	.07532	12/8/2006
December 2006	Total Suspended Solids	30D Conc	12	23.	12/1/2006
December 2006	Total Suspended Solids	30D Qty	0.09	.12832	12/1/2006
December 2006	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	13.5	12/1/2006
December 2006	Nitrogen, Ammonia (NH3-N)	30D Qty	0.02	.07532	12/1/2006
December 2006	CBOD 5 day	30D Conc	10	11.5	12/1/2006
August 2006	Total Suspended Solids	30D Conc	12	13.4	8/1/2006
March 2006	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	16.	3/8/2006
March 2006	Nitrogen, Ammonia (NH3-N)	7D Qty	0.03	.0757	3/8/2006
March 2006	CBOD 5 day	7D Conc	15	23.3	3/8/2006
March 2006	CBOD 5 day	7D Qty	0.11	.11024	3/8/2006
March 2006	Dissolved Oxygen	1D Conc	6.0	4.9	3/8/2006

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2006	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	16.	3/1/2006
March 2006	Nitrogen, Ammonia (NH3-N)	30D Qty	0.02	.0757	3/1/2006
March 2006	CBOD 5 day	30D Conc	10	23.3	3/1/2006
March 2006	CBOD 5 day	30D Qty	0.08	.11024	3/1/2006

Based upon review of MOR data for the WWTP, there appears to be a consistent problem with ammonia removal at the plant. Since the WWTP was originally designed to remove ammonia as part of the treatment process, operational procedures need to be improved.

The NPDES Permit for the plant is currently being renewed. Because of the continued problems being experienced with meeting permit discharge limits, the new NPDES Permit will contain a requirement that the WWTP be under the supervision of a Class I licensed Wastewater Operator. The licensed operator should have the operational knowledge to make improvements which will enable the WWTP to consistently meet its permitted effluent limits.

The renewed NPDES Permit should become effective within the next few months. A period of 6 months from the effective date of the permit is being given to obtain the services of the Class I licensed Wastewater Operator.

If you have any comments or questions regarding this correspondence, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

cc: John Sabo, Lorain County Health Department

File: SP/LorainCounty/ElyriaTwp/ElyriaMotel