



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 Korleski, Director

January 29, 2009

RE: SUMMIT COUNTY
CITY OF NORTON
VFW LOYAL OAK POST 4466
OHIO EPA PERMIT NO. 3PR00205*BD
COMPLIANCE EVALUATION INSPECTION

Mr. Charlie Shook
VFW Loyal Oak Post 4466
3069 Houston Road
Norton, OH 44203

Dear Mr. Shook:

On January 27, 2009, a Compliance Evaluation Inspection (CEI) was conducted at the wastewater treatment plant serving the VFW Loyal Oak Post 4466. The purpose of such an inspection is to determine whether the plant is meeting the requirements of its NPDES permit, and to inspect the overall condition of the plant.

According to our files, the existing wastewater treatment system consists of a 500 gallon trash trap, 1500 gallon equalization tank, 1000 gpd extended aeration plant, 500 gallon dosing chamber, 190 square foot surface sand filter, and chlorination/dechlorination.

Because the plant's fence was locked, a thorough inspection could not take place. But the blower motor was heard, which indicates the plant was probably running. The surface sand filters were iced over.

Upon review of the electronic Discharge Monitoring Reports (eDMR's) submitted for the plant from June 1, 2005 through December 2008, the following effluent violations were noted:

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2005	Total Suspended Solids	30D Conc	12	22.	6/1/2005
June 2005	Total Suspended Solids	7D Conc	18	22.	6/8/2005
June 2005	Total Suspended Solids	30D Qty	0.02	.02498	6/1/2005
June 2005	CBOD 5 day	30D Conc	10	11.	6/1/2005
August 2005	Nitrogen, Ammonia (NH3)	30D Conc	1.0	8.78	8/1/2005
August 2005	Nitrogen, Ammonia (NH3)	7D Conc	1.5	8.78	8/22/2005
August 2005	Nitrogen, Ammonia (NH3)	30D Qty	0.002	.00997	8/1/2005
August 2005	Nitrogen, Ammonia (NH3)	7D Qty	0.003	.00997	8/22/2005
December 2005	Total Suspended Solids	30D Conc	12	16.	12/1/2005
June 2006	Chlorine, Total Residu	1D Conc	0.019	1.19	6/26/2006
August 2006	Nitrogen, Ammonia (NH3)	30D Conc	1.0	7.77	8/1/2006
August 2006	Nitrogen, Ammonia (NH3)	7D Conc	1.5	7.77	8/15/2006
August 2006	Nitrogen, Ammonia (NH3)	30D Qty	0.002	.00882	8/1/2006
August 2006	Nitrogen, Ammonia (NH3)	7D Qty	0.003	.00882	8/15/2006
December 2006	Total Suspended Solids	30D Qty	0.02	.03785	12/1/2006
December 2006	Total Suspended Solids	7D Qty	0.03	.03785	12/8/2006
June 2007	Total Suspended Solids	30D Qty	0.02	.03407	6/1/2007

Mr. Charlie Shook
 VFW Loyal Oak Post 4466
 January 29, 2009
 Page 2

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2007	Total Suspended Solids	7D Qty	0.03	.03407	6/15/2007
June 2007	Chlorine, Total Residu	1D Conc	0.019	.3	6/18/2007
December 2007	CBOD 5 day	30D Conc	10	11.	12/1/2007
December 2007	CBOD 5 day	30D Qty	0.02	.04164	12/1/2007
December 2007	CBOD 5 day	7D Qty	0.03	.04164	12/15/2007
June 2008	Total Suspended Solids	30D Qty	0.02	.02725	6/1/2008
June 2008	Fecal Coliform	30D Conc	1000	19000.	6/1/2008
June 2008	Fecal Coliform	7D Conc	2000	19000.	6/15/2008

For the same time period, the following frequency violations were also noted:

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2005	Water Temperature	1/Week	1	0	06/01/2005
June 2005	Water Temperature	1/Week	1	0	06/08/2005
June 2005	Water Temperature	1/Week	1	0	06/15/2005
June 2005	Water Temperature	1/Week	1	0	06/22/2005
June 2005	Fecal Coliform	1/Quarter	1	0	06/01/2005
June 2005	Chlorine, Total Residu	1/Quarter	1	0	06/01/2005
June 2005	pH	1/Quarter	1	0	06/01/2005
July 2005	Water Temperature	1/Week	1	0	07/01/2005
July 2005	Water Temperature	1/Week	1	0	07/08/2005
July 2005	Water Temperature	1/Week	1	0	07/15/2005
July 2005	Water Temperature	1/Week	1	0	07/22/2005
August 2005	Fecal Coliform	1/Quarter	1	0	08/01/2005
August 2005	Chlorine, Total Residu	1/Quarter	1	0	08/01/2005
August 2005	pH	1/Quarter	1	0	08/01/2005
August 2005	Water Temperature	1/Week	1	0	08/01/2005
August 2005	Water Temperature	1/Week	1	0	08/08/2005
August 2005	Water Temperature	1/Week	1	0	08/15/2005
August 2005	Water Temperature	1/Week	1	0	08/22/2005
September 2005	Water Temperature	1/Week	1	0	09/15/2005
September 2005	Water Temperature	1/Week	1	0	09/22/2005
September 2005	Water Temperature	1/Week	1	0	09/01/2005
September 2005	Water Temperature	1/Week	1	0	09/08/2005
October 2005	Water Temperature	1/Week	1	0	10/01/2005
October 2005	Water Temperature	1/Week	1	0	10/08/2005
October 2005	Water Temperature	1/Week	1	0	10/15/2005
October 2005	Water Temperature	1/Week	1	0	10/22/2005
November 2005	Water Temperature	1/Week	1	0	11/01/2005
November 2005	Water Temperature	1/Week	1	0	11/08/2005
November 2005	Water Temperature	1/Week	1	0	11/15/2005
November 2005	Water Temperature	1/Week	1	0	11/22/2005
June 2006	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	06/01/2006
October 2006	Color, Severity	1/Week	1	0	10/01/2006
October 2006	Color, Severity	1/Week	1	0	10/08/2006

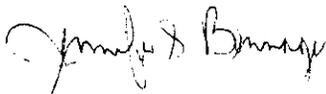
Mr. Charlie Shook
 VFW Loyal Oak Post 4466
 January 29, 2009
 Page 3

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2006	Color, Severity	1/Week	1	0	10/15/2006
October 2006	Odor, Severity	1/Week	1	0	10/01/2006
October 2006	Odor, Severity	1/Week	1	0	10/08/2006
October 2006	Odor, Severity	1/Week	1	0	10/15/2006
October 2006	Turbidity, Severity	1/Week	1	0	10/01/2006
October 2006	Turbidity, Severity	1/Week	1	0	10/08/2006
October 2006	Turbidity, Severity	1/Week	1	0	10/15/2006
August 2007	CBOD 5 day	1/Quarter	1	0	08/01/2007
August 2007	Chlorine, Total Residu	1/Quarter	1	0	08/01/2007
September 2007	Water Temperature	1/Week	1	0	09/01/2007
September 2007	Color, Severity	1/Week	1	0	09/01/2007
September 2007	Odor, Severity	1/Week	1	0	09/01/2007
September 2007	Turbidity, Severity	1/Week	1	0	09/01/2007
March 2008	Water Temperature	1/Week	1	0	03/01/2008
March 2008	Color, Severity	1/Week	1	0	03/01/2008
March 2008	Odor, Severity	1/Week	1	0	03/01/2008
March 2008	Turbidity, Severity	1/Week	1	0	03/01/2008
May 2008	Water Temperature	1/Week	1	0	05/15/2008
May 2008	Color, Severity	1/Week	1	0	05/15/2008
May 2008	Odor, Severity	1/Week	1	0	05/15/2008
May 2008	Turbidity, Severity	1/Week	1	0	05/15/2008
October 2008	Turbidity, Severity	1/Week	1	0	10/15/2008

Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111.

Also, upon review of the eDMR's, it was noted that the facility's reported flow values are well over the 500 gpd allowed per your NPDES permit. It is directed you and your treatment plant operator respond to this letter in writing by February 10, 2009, explaining the reasons for the high flows, numerous effluent limitation violations, and frequency violations. In the future, your wastewater treatment plant operator shall notify this office in writing each month of the various effluent/frequency violations, the reasons for the violations, and the planned actions to alleviate the violations. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
 Environmental Engineer
 Division of Surface Water

JSB/mt

cc: Tom LaPlante, Summit County Health Dept.