



**Environmental  
Protection Agency**

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

February 16, 2012

RE: LORAIN COUNTY  
ELYRIA TOWNSHIP  
ELYRIA MOTEL WWTP  
701 OBERLIN ROAD  
NPDES NO. 3PR00191

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

Dear Mr. Patel:

On January 31, 2012, a Compliance Evaluation Inspection (CEI) was conducted on the Elyria Motel wastewater treatment plant (WWTP), by this writer, and Mr. John Sabo of the Lorain County Health Department. The facility is located at 701 Oberlin Road, Elyria Township.

The purpose of the inspection was to evaluate the facility's operation and maintenance condition, as well as its compliance with its National Pollutant Discharge Elimination System (NPDES) permit effluent limits. The last CEI conducted at the Elyria Motel was on October 19, 2010.

At the time of the January 31<sup>st</sup> inspection, the following items were observed at the Elyria Motel WWTP:

- 1) The trash trap was in use and its contents were typical. According to previous discussions with you, the trash trap is pumped out approximately every six months.
- 2) The extended aeration tank contents were being well aerated, and were a watery, grayish brown color. Suspended solids concentrations in the aeration tank appeared to be somewhat low, indicating organic underloading. The return activated sludge (RAS) line was operational, returning clear water from the settling tank, and no foam was present on the surface of the aeration tank contents.
- 3) Contents of the settling tank were light gray and slightly turbid, and the skimmer was operating. There was a slight deposition of solids in the settling tank effluent trough.
- 4) The sand filter dosing station pumps were both in the 'AUTO' mode, and were operational when manually tested. The high level alarm light also was operational when manually tested.
- 5) The surface sand filter east cell was in use at the time of the inspection, and the west cell contained solids that were being dewatered. Sand in the filters was free of vegetation and was relatively level.

- 6) The tablet chlorination / dechlorination units were not in use, as disinfection is not required from November 1<sup>st</sup> through April 30<sup>th</sup>. The chlorination and dechlorination units are both two tube units, and both units contained the tubes with caps.

A SWIMS computer search for the operating data submitted for the Elyria Motel WWTP was conducted prior to the January 31<sup>st</sup> inspection. The electronic Discharge Monitoring Report (eDMR) data search covered the period of October 1, 2010, through January 1, 2012. Results of the eDMR data search found the following effluent numeric violations for the period reviewed:

**ELYRIA MOTEL  
 NPDES NO. 3PR00191  
 EFFLUENT NUMERIC VIOLATIONS  
 (OCT. 1, 2010 – JAN. 1, 2012)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	CBOD 5 day	30D Conc	10	13.	12/1/2010
December 2010	Total Suspended Solids	30D Conc	12	26.	12/1/2010
December 2010	Total Suspended Solids	30D Qty	0.09	.09516	12/1/2010
December 2010	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	4.52	12/1/2010
December 2010	Total Suspended Solids	7D Conc	18	26.	12/15/2010
December 2010	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	4.52	12/15/2010
March 2011	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	7.22	3/1/2011
March 2011	Nitrogen, Ammonia (NH3-N)	30D Qty	0.02	.03952	3/1/2011
March 2011	Nitrogen, Ammonia (NH3-N)	7D Qty	0.03	.03952	3/15/2011
March 2011	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	7.22	3/15/2011
June 2011	CBOD 5 day	30D Conc	10	11.8	6/1/2011
June 2011	Fecal Coliform	30D Conc	1000	7500.	6/1/2011
June 2011	Fecal Coliform	7D Conc	2000	7500.	6/15/2011
June 2011	Dissolved Oxygen	1D Conc	6.0	.	6/16/2011
August 2011	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	2.78	8/1/2011
August 2011	Nitrogen, Ammonia (NH3-N)	30D Qty	0.01	.01331	8/1/2011
August 2011	Fecal Coliform	30D Conc	1000	4000.	8/1/2011
August 2011	Chlorine, Total Residual	1D Conc	0.019	.07	8/4/2011
August 2011	Nitrogen, Ammonia (NH3-N)	7D Qty	0.01	.01331	8/8/2011
August 2011	Dissolved Oxygen	1D Conc	6.0	4.8	8/8/2011
August 2011	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	2.78	8/8/2011
August 2011	Fecal Coliform	7D Conc	2000	4000.	8/8/2011

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

Please be advised that your current NPDES Permit contains the requirement that the WWTP be under the supervision of a Class I licensed Wastewater Operator. The licensed Wastewater Operator was to have been under contract by November 1, 2008, and an Operator of Record

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(ORC) Notification Form (ORC Form EPA 5121) was to have been sent to the Ohio EPA at that time. There is no record of this required form having ever been submitted.

You are to acquire the services of a licensed Class I (or higher) Wastewater Operator for your WWTP within 30 days of the receipt of this correspondence. The enclosed ORC Form EPA 5121 is to be completed, and submitted to this office with written correspondence confirming the hiring of the Licensed Operator. The licensed operator should have the operational knowledge to make improvements which will enable the WWTP to consistently meet its permitted effluent limits.

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/cs

Enclosure

cc: John Sabo, Lorain County Health Department