



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

May 13, 2013

RE: TRUMBULL COUNTY
MECCA TWP
CORTLAND MOOSE LODGE
NPDES PERMIT NO. OH0133302
OHIO EPA PERMIT NO. 3PR00340
COMPLIANCE EVALUATION INSPECTION

Mr. William Bartholomew, Administrator
Cortland Moose Lodge 1012
6400 State Route 46
Cortland, Ohio 44410

Mr. Bartholomew:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on April 25, 2013. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's overall compliance with the terms and conditions of the NPDES permit.

The existing treatment system consists of a trash trap, 1,500-gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, chlorination, and a final polishing pond. Treated effluent is discharged to a tributary of Mosquito Creek Reservoir.

During the inspection, the following observations and/or deficiencies were noted:

1. The overall operation and maintenance of the treatment works appeared to be marginal. While all treatment components appeared to be in working condition, a number of routine O & M items do not appear to be getting addressed.
2. Tank gratings are quite rusty at the plant.
3. The mixed liquor was quite watery, and greyish in color. The ideal color for mixed liquor is a chocolate brown color.
4. Floating sludge and an elevated sludge blanket were observed in the clarifier.
5. Excessive solids carryover from unsettled sludge was observed in the weir trough.
6. Excessive sludge and vegetation were observed in the dose tank.
7. The sand filter distribution box is cracked, and needs to be repaired or replaced.

8. As has been documented during the last several inspections, solids washouts to the sand filters continues to be a problem. You indicated during the inspection that solids washouts occur during periods of high flow. Being that the system should be isolated to receiving sanitary flow only, any sources of inflow/infiltration must be located, and subsequently eliminated.

Additionally, better operation of the plant, and in particular getting a good settling in the clarifier and ensuring proper wasting occurs, could help address the solids problem in the sand filters.

9. Once the sand filters have been cleaned and raked, please verify the depth of sand. Sand depth must be a minimum of 18 inches.
10. Please note that disinfection season is from May 1 through October 31.
11. A bound and numbered logbook was not observed at the facility. Please ensure that a bound and numbered logbook is maintained on site, and used to document all O & M activities at the treatment plant. Plant O & M personnel should log their time in and out, the date, a brief description of the work performed, and their initials.
12. The final effluent appeared to be relatively clear, and was not causing any immediately-noticeable, adverse impacts to the receiving stream.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period September 2011 – April 2013 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PR00340*BD	March 2012	602	00300	Dissolved Oxygen	1D Conc	6.0	5.6	3/20/2012
3PR00340*BD	August 2012	602	00300	Dissolved Oxygen	1D Conc	6.0	3.2	8/6/2012

The eDMR review also indicated that the facility continues to report "AL," or no discharge, for Station 001, despite past correspondence from this office indicating that this would be highly unlikely. Additionally, most recently, AL was reported for the month of April, despite this office documenting a visible discharge from the polishing lagoon overflow pipe on the day of the inspection (April inspection).

The facility's flow reporting for Outfall 001 is **not** representative of the actual conditions observed at the site, and does not fulfill the monitoring and reporting obligations contained in the NPDES permit. Please note that failure to report the required monitoring information is a violation of the NPDES permit. Please provide to this office, documentation describing exactly how the flow through Outfall 001 is documented and quantified.

In addition to the inspection findings and the eDMR review, this office also noted that your Limited Class "A" wastewater license expired in 2010. Since your wastewater license has expired, and you have not filed for a timely renewal, Cortland Moose Lodge is considered to be without a valid operator since 2010, which violates Part II, A of the NPDES permit. Please submit to Ohio EPA immediately a completed Operator of Record Notification (ORC) form.

This office also noted that Mr. Ed Mosko of Valley Environmental Labs, Inc. has been routinely submitting the facility's eDMR data. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22". 40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative.

As explained in this section:

A person is a duly authorized representative if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

This office has no documentation on file (no ORC form) indicating that Mr. Ed Mosko has been officially designated as an operator of record for the facility. As such, and based on the requirements outlined in 40 CFR 122.22, Mr. Mosko may not submit eDMR data on behalf of Cortland Moose Lodge.

The majority of violations identified in this letter have been documented on multiple occasions during past inspections. Multiple letters over the years identifying these issues and requiring them to be addressed have been sent to The Cortland Moose Lodge. Due to the long-documented history of noncompliance at the site, you can expect that Ohio EPA will be calling in representatives from the Cortland Moose Lodge for a meeting at Ohio EPA's Northeast District Office to discuss the reasoning for the continued noncompliance, and corrective measures that must be implemented to return the facility to compliance with its NPDES permit.

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Additionally, past or current acts of noncompliance can continue as subjects of future enforcement actions. Such enforcement actions can result in fines of up to \$10,000 per day of violation.

Please submit to Ohio EPA, within 14 days' receipt of this notification, written documentation describing the course of action that will be taken, or has been taken, to address the items identified in this letter. Your response shall include specific dates for the initiation and completion of this action plan.

CORTLAND MOOSE LODGE
MAY 13, 2013
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Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,

A handwritten signature in cursive script that reads "Tomás Parry".

Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

Attachment: ORC Form
Photographs

cc: Steve Kramer, R.S., Trumbull County Board of Health
Frank Migliozi, R.S., Trumbull County Board of Health
Valley Environmental Labs, Inc.



