



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

May 17, 2013

Mr. Jim Shade  
Middletown Sportsmen Club  
6943 Michael Road  
Middletown, Ohio 45042

**RE: Butler County, Middletown Sportsmen Club  
Compliance Evaluation Inspection and Notice of Violation**

Dear Mr. Shade:

On May 9, 2013, I conducted a Compliance Evaluation Inspection at the Middletown Sportsmen Club (NPDES Permit No. OH0141283; OEPA Permit No. 1PR00117\*AD). Representing this facility was Mike Erter and Suvoyee Rudd. A copy of my inspection report is enclosed.

The inspection report contains three unsatisfactory areas. The Records / Reports section was rated unsatisfactory as a result of the failure to submit the noted Discharge Monitoring Reports and the annual sludge disposal report. The Compliance Schedule section was rated unsatisfactory as a result of the failure to install the sign required for the WWTP outfall. The Self – Monitoring Program section was rated unsatisfactory as a result of the failure to monitor the discharge from the old and new treatment systems.

Problems with the WWTP operations have also started to occur. The facility must get this treatment system in proper working order as soon as possible.

Finally, the issue of monitoring and reporting the discharge from this facility is a very serious matter. The majority of the reports have not even been submitted at this time. For the submitted reports, no information has been provided on the wastewater sampling results. The facility must immediately start sampling the wastewater and submitting these reports. The failure to comply with these requirements will result in this office's recommendation that enforcement action be pursued in accordance to Ohio Revised Code Chapter 6111.

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The areas noted in the report summary will require a written response by May 31, 2013. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ned Sarle".

Ned Sarle  
Environmental Specialist  
Division of Surface Water – Permits Section

NS/kb

Enclosure



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report  
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PR00117*AD	OH0141283	5/9/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Middletown Sportsmen Club 6943 Michael Road Middletown, Ohio 45042	12:55 P.M.	7/1/2012
	Exit Time	Permit Expiration Date
	2:45 P.M.	6/30/2017
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mike Erter, Club Manager Suvoyee Rudd, Rudd Excavation	(937) 238-2432 (513) 464-3591	
Name, Address and Title of Responsible Official	Phone Number	
Jim Shade, President 6943 Michael Road Middletown, Ohio 45042	(513) 422-5112	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	U	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	

Inspector	Reviewer
 Date 5/17/13	 Date 5/17/13
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 1PR00117\*AD

NPDES #: OH0141283

Average Daily Design Flow:	<b>2500 Gallons/Day</b>
Plant Serves:	Social Club
Average Daily Flow: (Period of Review):	<b>Unknown Gallons/Day</b> ( )
Method of flow monitoring:	<b>elapse time meter for influent pump station</b>
Type of alarms for plant:	<b>High water alarms</b>

### Pretreatment

Type of Pretreatment: **Other**  
Does the Trash Trap need pumped: **N/A**  
Maintenance of pretreatment components is: **Good**

#### Comments/Status:

Wastewater treated via two septic tanks.

### Recirculating Sand Filter Treatment

	Yes	No		Yes	No
Recirculating sand filters:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Subsurface</b>	<input type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Fair**

#### Comments/Status:

The tertiary treatment system consists of two recirculating sand filters.

### Sludge Handling/Storage Disposal

Hauler name:  
Disposal Site:  
Sludge wasted from:  
How often is sludge wasted:  
Sludge drying beds: **No**                      Sludge holding tank: **No**

Overall maintenance of components is: **Fair**

#### Comments/Status:

Sludge is maintained in the two septic tanks.

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**Plant Discharge**

Discharge point is a: **Ditch**  
Name of discharge point: **Great Miami River via unnamed tributary**  
Discharge is visible: **Yes**                      Quality of Effluent: **Cloudy**

**Comments/Status:**

None.

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## **Summary of Findings / Comments**

### Areas Requiring a Response

We have attempted to review your Discharge Monitoring Reports (DMRs) covering the months of July 2012 through March 2013 for the referenced facility. The July, August and December 2012 and the January, February and March 2013 DMRs were noted as not having been submitted as required by your NPDES Permit. The September, October and November 2012 DMRs were submitted as required by your NPDES Permit. However, these reports noted that your treatment system did not discharge. This is not correct. The old treatment system was still discharging until the new treatment system construction was completed in December 2012. Action must be taken to start submitting the DMRs immediately.

The facility has contracted with Sharon Vaughn to be the certified operator of this treatment system. She is a Class III wastewater operator. An Operator of Record form must be submitted by the facility. This form must indicate that she is the Operator of Record. This form may be found at the following location: <http://epa.ohio.gov/ddagw/opcert.aspx>. Please submit this form immediately. The Operator of Record is also required to be at the site two days a week for a minimum of one hour. The Operator of Record should also be assisting in the WWTP operation and getting it to operate correctly.

An Operator of Record logbook must be maintained at the treatment system and contain the following information:

1. Identification of treatment works.
2. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7.
3. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.).
4. Laboratory results (unless documented on bench sheets).
5. Identification of person making entries.

The WWTP discharge is required to be monitored and reported in accordance to the NPDES Permit. The facility must comply with these requirements immediately.

An annual sludge disposal report must be submitted by January 31 of each year. This requirement is addressed in Part II, Section N of your NPDES Permit. Please submit this report immediately.

A sign must be posted at the WWTP discharge location. This is addressed in Part II, Section P of your NPDES Permit. This sign has not been installed as required by the NPDES Permit. The facility must install this sign as soon as possible.

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The treatment system consists of an influent pump station, force main, two septic tanks, a recirculation dosing tank, two recirculating sand filters and an ultraviolet disinfection system. The PTI for this treatment system was approved on July 16, 2012. The WWTP construction was completed in late December 2012. Rudd & Sons Excavation dug the necessary excavations, constructed the WWTP piping and constructed the recirculating sand filters. Beckman Environmental set the treatment tanks and installed the necessary pumps and pump controls.

The treatment system seemed to be operating in a suitable manner until the third week of April. At that time, the wastewater started to pond on the recirculating sand filters and came close to overflowing these filters. A slim buildup was noted on the surface of the recirculating sand filters. The facility has requested assistance in operating this treatment system. Based on my observations, the following items should be evaluated and / or addressed:

1. The wastewater seems to be draining very slowly through the recirculating sand filters. The sand also appeared to have a lot of fine material. Excessive fine material could cause the filters to drain slowly. We recommended that the sand be tested by an environmental testing company to ensure it complied with the sand specifications. During the inspection, a sample of the sand was collected and was to be sent to Bowser Morner Inc. The testing results must be provided to the Ohio EPA.
2. The two dosing pumps for the recirculating sand filter appears to operate at the same time. This is not acceptable. The pumps were designed to alternate in operation. Please ensure that these pumps are operating correctly.
3. One dosing pump should operate once every 20 minutes and should run for approximately 3 minutes. This should result in 208 gallons of wastewater being dosed for each event. In the dosing tank, the liquid level should drop by about 4 inches for each dosing event.
4. During the inspection, the recirculation valve appears to allow wastewater at the same time to flow to both the UV disinfection system and the recirculation tank. The recirculation valve in the recirculating dosing tank should be checked to ensure it is operating correctly.
5. As an interim action, the slim layer at the top of the recirculating sand filter should be removed to ensure that the wastewater flows through these filters as quickly as possible.
6. The treatment system was designed for an average daily flow of 2500 gpd. The flow records should be checked to ensure the amount of wastewater being generated is within the design of the treatment system.

#### Areas not Requiring a Response

The recirculating sand filters are adjacent to the shooting range. The Ohio EPA recommends enclosing the treatment system with a security fence to prevent unauthorized entry to the treatment system. The fence could also be used to screen this area from view.