



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

August 21, 2013

RE: LORAIN COUNTY  
CARLISLE TWP.  
OBERLIN VFW POST 6273  
CEI  
PERMIT NO. 3PR00539

Mr. Howard Codney, Post Commander  
Oberlin VFW Post 6273  
42369 Oberlin-Elyria Rd.  
Elyria, OH 44035

Dear Mr. Codney:

A Compliance Evaluation Inspection (CEI) was conducted August 1, 2013, on the wastewater treatment plant (WWTP) serving the Oberlin VFW Post 6273. The CEI was conducted this writer, and Mr. John Sabo of the Lorain County Health Department. It is noted the Oberlin VFW Post 6273 is located at 42369 Oberlin-Elyria Road, Carlisle Township, Lorain County.

The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and its compliance with the terms and conditions of the recently effective National Pollutant Discharge Elimination System (NPDES) Permit to discharge (Permit # 3PR00539\*AD) issued for the facility.

At the time of the August 1<sup>st</sup> inspection, the following observations were made:

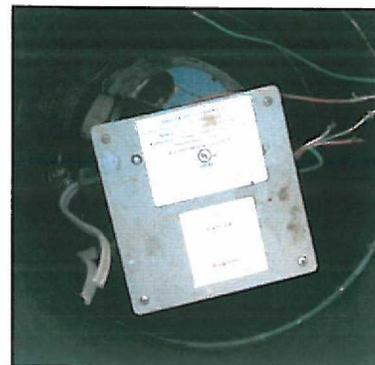
- 1) The trash trap was in use, and contents were typical. No pumping of the trash trap was needed.
- 2) Contents of the extended aeration tank were well aerated, and were watery light brown in color. The return sludge line from the settling tank was operating, returning a very light brown liquid to the aeration tank from the settling tank.

**Aeration of the tank contents appeared to be somewhat excessive, causing a violent mixing of the tank contents. It is recommended the amount of air flow to the aeration tank be lessened, such that proper floc formation can be achieved, and the solids have a better chance of settling in the settling tank.**

- 3) Air to the extended aeration tank is provided by two blower/motors, and both were in operation at the time of the inspection. Use of the blower/motors is controlled by a timer located in the electrical control box.
- 4) The settling tank contents were turbid gray, and the settling tank effluent trough was clean. The skimmer was operating, but was adjusted too high above the surface of the water in the tank, allowing floating scum/solids to be present on the water surface. **The skimmer needs to be adjusted to approximately ¼ inch below the surface of the water.**

There also was a buildup of scum/solids behind the inlet baffle of the settling tank. **The built up and floating scum in the settling tank should be removed and the tank surface kept free of its presence.**

- 5) Both pumps in the sand filter dosing station were set in the 'AUTO' mode, and were operational when tested manually. The high water level alarm was also functional when manually tested.
- 6) The surface sand filter south cell was dosed when the dosing pumps were manually tested. The south filter cell contained some vegetative growth, and the north filter cell was clean. **The filter cells should be kept free of vegetative growth and solids deposition.**
- 7) Disinfection of the treated effluent is accomplished using an Ultra Violet (UV) disinfection unit following the sand filters. The inspection found the electrical wires to the UV unit have been cut, thus rendering the UV unit inoperative, and the effluent not disinfected (see photo). **The electrical supply to the UV unit needs to be repaired immediately.**



**Please be advised that effluent disinfection is required between May 1<sup>st</sup> and October 31<sup>st</sup>, and exceedance of E. coli limits is a violation of the facility's NPDES permit.**

- 8) There was no effluent being discharged from the WWTP at the time of the inspection.

The NPDES permit (3PR00539\*AD) for the Oberlin VFW Post 6273 went effective November 1, 2011. Beginning December 2011, monthly operating reports/data were to have been submitted to the Ohio EPA on a monthly basis. It is noted that submittal of NPDES permit-required monthly operating reports for the facility did not commence until July 2012. **Please be advised that non-submittal of required monthly operating reports is a violation of the NPDES Permit terms and conditions, and is subject to legal enforcement action.**

A review of the data base for your facility indicates that the Certified Operator of Record (ORC) for the facility is Tracey Weller, Class III Wastewater Operator. The ORC notification for your facility was sent in to Ohio EPA on October 28, 2010.

A review of the electronic Discharge Monitoring Reports (eDMR's) which were submitted to the Ohio EPA for the Oberlin VFW Post 6273 WWTP since July 2012, found the following numeric effluent violations for the facility:

**OBERLIN VFW POST 6273**  
**NPDES NO. 3PR00539**  
**NUMERIC EFFLUENT VIOLATIONS**  
**(NOV. 1, 2011 – JUL. 1, 2013)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	Total Suspended Solids	7D Conc	18	81.5	7/15/2012
July 2012	Total Suspended Solids	7D Conc	18	109.4	7/22/2012
July 2012	Total Suspended Solids	30D Conc	12	95.45	7/1/2012
July 2012	Total Suspended Solids	30D Qty	0.159	.18064	7/1/2012
July 2012	CBOD 5 day	7D Conc	15	34.	7/15/2012
July 2012	CBOD 5 day	30D Conc	10	17.5	7/1/2012
July 2012	E. coli	7D Conc	362	518.	7/22/2012
July 2012	E. coli	30D Conc	161	518.	7/1/2012
August 2012	Total Suspended Solids	7D Conc	18	76.1	8/1/2012
August 2012	Total Suspended Solids	7D Conc	18	137.	8/8/2012
August 2012	Total Suspended Solids	7D Qty	0.239	.33705	8/8/2012
August 2012	Total Suspended Solids	30D Conc	12	74.475	8/1/2012
August 2012	Total Suspended Solids	7D Conc	18	78.2	8/22/2012
August 2012	Total Suspended Solids	30D Qty	0.159	.18323	8/1/2012
August 2012	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	28.	8/15/2012
August 2012	Nitrogen, Ammonia (NH3-N)	7D Qty	0.0199	.06889	8/15/2012
August 2012	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	9.387	8/1/2012
August 2012	Nitrogen, Ammonia (NH3-N)	30D Qty	0.0133	.02309	8/1/2012
August 2012	E. coli	7D Conc	362	2420.	8/15/2012
August 2012	E. coli	30D Conc	161	2420.	8/1/2012
September 2012	Total Suspended Solids	7D Conc	18	111.	9/1/2012
September 2012	Total Suspended Solids	7D Conc	18	77.3	9/8/2012
September 2012	Total Suspended Solids	7D Conc	18	30.7	9/15/2012
September 2012	Total Suspended Solids	7D Conc	18	36.3	9/22/2012
September 2012	Total Suspended Solids	30D Conc	12	63.825	9/1/2012
October 2012	Total Suspended Solids	7D Conc	18	138.	10/8/2012
October 2012	Total Suspended Solids	7D Qty	0.239	.3134	10/8/2012
October 2012	Total Suspended Solids	7D Conc	18	70.	10/15/2012
October 2012	Total Suspended Solids	30D Conc	12	61.3	10/1/2012
October 2012	Total Suspended Solids	7D Conc	18	34.	10/22/2012
November 2012	Total Suspended Solids	7D Conc	18	59.	11/8/2012
November 2012	Total Suspended Solids	7D Conc	18	96.	11/15/2012
November 2012	Total Suspended Solids	30D Conc	12	56.825	11/1/2012
November 2012	Total Suspended Solids	7D Conc	18	68.	11/22/2012
December 2012	Total Suspended Solids	7D Conc	18	18.8	12/1/2012
December 2012	Total Suspended Solids	7D Conc	18	26.8	12/8/2012
December 2012	Total Suspended Solids	7D Conc	18	42.9	12/15/2012
December 2012	Total Suspended Solids	7D Conc	18	39.7	12/22/2012
December 2012	Total Suspended Solids	30D Conc	12	32.05	12/1/2012
January 2013	Total Suspended Solids	7D Conc	18	20.	1/1/2013
January 2013	Total Suspended Solids	7D Conc	18	76.9	1/8/2013
January 2013	Total Suspended Solids	30D Conc	12	53.625	1/1/2013

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2013	Total Suspended Solids	7D Conc	18	106.7	1/22/2013
January 2013	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	4.82	1/1/2013
January 2013	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	4.58	1/15/2013
January 2013	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	4.7	1/1/2013
February 2013	Dissolved Oxygen	1D Conc	6.0	5.1	2/6/2013
February 2013	Total Suspended Solids	7D Conc	18	34.	2/1/2013
February 2013	Total Suspended Solids	7D Conc	18	70.	2/15/2013
February 2013	Total Suspended Solids	30D Conc	12	33.825	2/1/2013
February 2013	Total Suspended Solids	7D Conc	18	21.	2/22/2013
February 2013	CBOD 5 day	7D Conc	15	18.	2/1/2013
February 2013	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	14.7	2/1/2013
February 2013	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	8.93	2/1/2013
March 2013	Dissolved Oxygen	1D Conc	6.0	4.8	3/6/2013
March 2013	Dissolved Oxygen	1D Conc	6.0	5.8	3/13/2013
March 2013	Dissolved Oxygen	1D Conc	6.0	5.9	3/20/2013
March 2013	Total Suspended Solids	7D Conc	18	20.7	3/1/2013
March 2013	Total Suspended Solids	7D Conc	18	47.3	3/8/2013
March 2013	Total Suspended Solids	7D Conc	18	18.5	3/15/2013
March 2013	Total Suspended Solids	30D Conc	12	24.575	3/1/2013
March 2013	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	6.94	3/1/2013
March 2013	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	8.4	3/15/2013
March 2013	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	7.67	3/1/2013
April 2013	Dissolved Oxygen	1D Conc	6.0	5.1	4/3/2013
April 2013	Total Suspended Solids	7D Conc	18	193.	4/1/2013
April 2013	Total Suspended Solids	7D Conc	18	56.	4/8/2013
April 2013	Total Suspended Solids	30D Conc	12	65.725	4/1/2013
May 2013	Total Suspended Solids	30D Conc	12	13.4	5/1/2013
June 2013	Total Suspended Solids	7D Conc	18	20.3	6/22/2013
June 2013	E. coli	30D Conc	161	2420.	6/1/2013
June 2013	E. coli	7D Conc	362	2420.	6/22/2013

**\*\*NOTE: Data submittal started July 2012.**

**Improved operation and maintenance practices need to be implemented, which will enable the Oberlin VFW Post 6273 WWTP to continuously meet its NPDES Permit effluent limits. Those maintenance items outlined above in bold text need to be addressed immediately.**

Please contact this office in writing, within 14 days of the receipt of this letter, with the status of the O&M issues. A follow-up inspection by this writer, or Mr. Sabo, will be conducted to verify the corrections.

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If there are questions or comments regarding the contents of this letter, please contact this office.

Respectfully,



Charles E. Allen  
Environmental Engineer  
Division of Surface Water

CEA/cs

cc: John Sabo, Lorain County Health Department