



**Environmental
Protection Agency**

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

Re: Sandusky County
Green Creek Township
Club Rog

November 17, 2011

Mr. Roger A. Loose
Club Rog
2460 West McPherson Highway
Fremont, Ohio 43402

Dear Mr. Loose:

On November 1, 2011, an inspection was made of wastewater treatment facilities at Club Rog, located at 2460 West McPherson Highway. Our observations and recommendations are as follows:

1. Aeration was being provided at the time of the inspection.
2. The sludge return was not operating at the time of inspection.
3. The skimmer was not operating at the time of inspection, and should be used as needed.
4. The east sand filter was in use at the time, with some weed growth noted. The west sand filter was clean and ready for use.

Operator Log Requirements

Required recordkeeping and documentation at the facility must be implemented immediately. A log book must be developed to keep an up-to-date record for wastewater system operations and maintenance, which contains, at a minimum, the following information:

- Identification of the sewerage system, or treatment works;
- Date and times of arrival and departure for the operator of record;
- Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage received and/or effluent produced;
- Results of tests performed and samples taken, unless documented on a laboratory bench sheet;
- Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced; and
- Identification of the persons making entries.

The records must be kept up-to-date, contain a minimum of three months of data at all times, and be maintained onsite for at least three years.

Operator of Record (ORC)

Ohio Administrative Code (OAC) Rule 3745-7-02(A) requires *"Each person owning or operating a treatment works or sewerage system ... shall designate one or more operator of record to oversee the technical operation of the treatment works, sewerage system or each wastewater treatment facility. Each*

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operator of record shall have a valid certification of a class equal to or greater than the classification of the treatment works, sewerage system or wastewater treatment facility. Notification shall be made on a form acceptable to the director..."

If you have an appropriately certified ORC, please complete the enclosed ORC Notification Form and fax it to (614) 644-2745 or send via email to daniel.kopec@epa.state.oh.us.

If you do not have an appropriately certified ORC, please hire/appoint an appropriately certified operator and submit the enclosed ORC Notification Form.

OAC Chapter 3745-7: Operator Certification for Public Water Systems and Wastewater Treatment Works is available at: <http://www.epa.ohio.gov/dsw/opcert/opcert.aspx>.

E-DMR – NOV

A review of your monthly discharge monitoring reports (DMRs) has also been conducted. A list of permit violations (March 2008 through September 2011) is enclosed. It is noted that no DMRs were received for the months of May 2010 through September 2011. This represents significant permit violations.

Chlorine (Total Residual) was reported as "AA - Below Detectable Limit" with a reported MDL of 0.10, for the months of September 2008 through October 2009. The indicated MDL is not acceptable for the chlorine permit limit of 0.019 mg/l. No data has been received for the other months as indicated above.

Pursuant to ORC Section 6111.07(A), no person shall violate or fail to perform any duty imposed by ORC Sections 6111.01 to 6111.08 or term or condition of a permit issued or adopted by the Director of Ohio EPA pursuant to those sections. It is noted that Club Rog (R&E Entertainment Inc.) violated terms and conditions of its NPDES permit and each day of violation is a separate offense.

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

Please inform this office in writing within ten days of receipt of this letter as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

If there are any questions, please contact me at 419-373-3014.

Yours truly,



Mary Beth Cohen
Division of Surface Water

/jlm

Enclosure

pc: Sandusky County Health Department
NWDO-DSW file

Club Rog WWTP 2PR00170

No DMR were submitted for the following months:

| Reporting Period | DMR submitted |
|------------------|---------------|
| May 2010 | None |
| June 2010 | None |
| July 2010 | None |
| August 2010 | None |
| September 2010 | None |
| October 2010 | None |
| November 2010 | None |
| December 2010 | None |
| January 2011 | None |
| February 2011 | None |
| March 2011 | None |
| April 2011 | None |
| May 2011 | None |
| June 2011 | None |
| July 2011 | None |
| August 2011 | None |
| September 2011 | None |

Limit Violation Outfall 001 (March 2008 thru September 2011)

| Reporting Period | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|------------------|----------------|-------------------------|------------|-------|----------------|----------------|
| May 2009 | 00530 | Total Suspended Solids | 1D Conc | 18 | 19. | 5/5/2009 |
| January 2010 | 00530 | Total Suspended Solids | 30D Conc | 12 | 13. | 1/1/2010 |
| March 2010 | 00610 | Nitrogen, Ammonia (NH3) | 30D Conc | 3.0 | 14.32 | 3/1/2010 |
| March 2010 | 00610 | Nitrogen, Ammonia (NH3) | 1D Conc | 4.5 | 14.32 | 3/2/2010 |

MDL reported is above the permitted limit of 0.019 mg/l

| Parameter | Reporting Code | Units | Date | Reported Value | A Code | MDL |
|--------------------------|----------------|-------|-----------|----------------|--------|------|
| Chlorine, Total Residual | 50060 | mg/l | 9/2/2008 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 10/7/2008 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 5/5/2009 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 6/2/2009 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 7/7/2009 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 8/4/2009 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 9/1/2009 | | AA | 0.10 |
| Chlorine, Total Residual | 50060 | mg/l | 10/6/2009 | | AA | 0.10 |