



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

April 9, 2007

**Re:** Athens County  
Cool Spot Convenience Store  
Compliance Evaluation Inspection  
NPDES Permit 0PR00127  
Correspondence (PWW)

Bryan White, Owner  
25780 Brimstone Road  
Coolville, Ohio 45723

Dear Mr. White:

On April 2, 2007, I conducted a Compliance Evaluation Inspection (CEI) for the waste water treatment plant (WWTP) serving the Cool Spot Convenience Store. You and Jerry Smith (Buckeye Environmental Services) accompanied me during the inspection. The purpose of the inspection was to determine compliance with the terms and conditions set forth in the NPDES Permit.

The following are concerns/comments which arose from the inspection.

1. The sludge in the aeration basin appeared to be weaker than normal.
2. During the inspection I observed significant amounts of solids flowing over the clarifier weirs and accumulating on the sand filters.

Comments 1 and 2 above are likely due to improper WWTP operation and characteristics of the incoming waste water. Weak biological growth in the aeration basin leads to poor solids treatment, sludge bulking in clarifiers, clogged sand filters and possible TSS violations. Changes in WWTP operational procedures are recommended in order to remedy the above concerns.

3. During the inspection, you stated the grease trap is pumped every three months, yet the last time it had been pumped was December of 2006. The significant amount of grease floating in the clarifier is evidence that the grease trap is full and needs pumped. Immediately pump the grease trap.
4. We have received your self-monitoring report covering January 2006 to February 2007, for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance and/or deficiencies are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
<b>2006</b>						
<b>January</b>						
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.6	1/1/2006
<b>February</b>						
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.6	2/1/2006
<b>March</b>						
	001	Total Suspended Solids	30D Conc	12	19.	3/1/2006
	001	Total Suspended Solids	7D Conc	18	19.	3/1/2006
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	19	3/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	19	3/1/2006
	001	Nitrogen, Ammonia (NH3)	30D Qty	.040	0.14	3/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Qty	.060	0.14	3/1/2006
	001	CBOD 5 day	30D Conc	10	17.	3/1/2006
	001	CBOD 5 day	7D Conc	15	17.	3/1/2006
<b>April</b>						
	001	Total Suspended Solids	30D Conc	12	34.	4/1/2006
	001	Total Suspended Solids	7D Conc	18	34.	4/1/2006
	001	Total Suspended Solids	30D Qty	.16	0.25	4/1/2006
	001	Total Suspended Solids	7D Qty	.24	0.25	4/1/2006
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	14	4/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	14	4/1/2006
	001	Nitrogen, Ammonia (NH3)	30D Qty	.040	0.1	4/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Qty	.060	0.1	4/1/2006
	001	CBOD 5 day	30D Conc	10	23.	4/1/2006
	001	CBOD 5 day	7D Conc	15	23.	4/1/2006
	001	CBOD 5 day	30D Qty	.13	0.17	4/1/2006
	001	Dissolved Oxygen	1D Conc	6	3.8	4/3/2006
	001	Dissolved Oxygen	1D Conc	6	5.6	4/17/2006
	001	Dissolved Oxygen	1D Conc	6	4.3	4/24/2006
<b>May</b>						
	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	9.8	5/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	9.8	5/1/2006
	001	Nitrogen, Ammonia (NH3)	30D Qty	.013	0.095	5/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Qty	.020	0.095	5/1/2006
	001	Dissolved Oxygen	1D Conc	6	5.4	5/22/2006
<b>June</b>						
	001	Dissolved Oxygen	1D Conc	6	5.2	6/5/2006
	001	Dissolved Oxygen	1D Conc	6	5.9	6/12/2006
	001	Dissolved Oxygen	1D Conc	6	5.6	6/19/2006
	001	Dissolved Oxygen	1D Conc	6	4.7	6/26/2006
<b>July</b>						
	001	Dissolved Oxygen	1D Conc	6	5.	7/5/2006
	001	Dissolved Oxygen	1D Conc	6	1.2	7/17/2006

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
	001	Dissolved Oxygen	1D Conc	6	1.5	7/24/2006
<b>August</b>						
	001	Dissolved Oxygen	1D Conc	6	4.9	8/7/2006
	001	Dissolved Oxygen	1D Conc	6	5.4	8/14/2006
	001	Dissolved Oxygen	1D Conc	6	5.6	8/21/2006
	001	Chlorine, Total Residual	1D Conc	.019	.06	8/21/2006
	001	Dissolved Oxygen	1D Conc	6	5.1	8/28/2006
<b>September</b>						
	001	Chlorine, Total Residual	1D Conc	.019	.07	9/5/2006
	001	Dissolved Oxygen	1D Conc	6	5.5	9/18/2006
<b>October</b>						
	001	Chlorine, Total Residual	1D Conc	.019	.06	10/2/2006
<b>December</b>						
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	7.4	12/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	7.4	12/1/2006
	001	Nitrogen, Ammonia (NH3)	30D Qty	.040	0.061	12/1/2006
	001	Nitrogen, Ammonia (NH3)	7D Qty	.060	0.061	12/1/2006
<b>2007</b>						
<b>January</b>						
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	18	1/1/2007
	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	18	1/1/2007
	001	Nitrogen, Ammonia (NH3)	30D Qty	.040	0.13	1/1/2007
	001	Nitrogen, Ammonia (NH3)	7D Qty	.060	0.13	1/1/2007
<b>February</b>						
	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	18	2/1/2007
	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	18	2/1/2007
	001	Nitrogen, Ammonia (NH3)	30D Qty	.040	0.13	2/1/2007
	001	Nitrogen, Ammonia (NH3)	7D Qty	.060	0.13	2/1/2007

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please inform this office, in writing, within thirty (30) days of receipt of this notification 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.

5. Please be aware, the Ohio EPA has recently finalized new operator certification rules which set requirements for minimum staffing requirements among other things. The final rule is Ohio Administrative Code (OAC) 3745-07 and can be viewed in its entirety at <http://www.epa.state.oh.us/ddagw/oac.html#374507>. The minimum staffing requirements will not be effective until the Cool Spot WWTP

NPDES Permit is renewed, but all other aspects of the new rule were effective December 21, 2006. Of note, these new rules require the Operator of Record (Mr. White) maintain a log book documenting daily activities at the plant. The specific requirements of the log book are listed in the rule. Also, per the draft NPDES Permit, a Class A certified operator will be required for the Cool Spot WWTP. I encourage you to read the rule and contact me with any questions you may have.

Please respond, in writing, within thirty (30) days of receipt of this letter addressing comments 1, 2, 3 and 5 above.

Should you have any questions or concerns, feel free to contact me at (740) 380-5226.

Sincerely,



Patrick Hudnall  
District Representative  
Division of Surface Water

PH/dh

Enclosure

c: Jerry Smith, Buckeye Environmental Services

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPR00127	OH0124621	April 2, 2007	C	S	1

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Cool Spot Convenience Store WWTP	10:00 AM	June 1, 2002
	Exit Time	Permit Expiration Date
	10:45 AM	May 31, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Bryan White, Owner/Operator Jerry Smith, Tech Assistance/Sampling	740-667-6100 740-342-9191
Name, Address and Title of Responsible Official	Phone Number
Bryan White, Owner/Operator	740-667-6100

**C. AREAS EVALUATED DURING INSPECTION**

<u>  </u> S Permit	<u>  </u> S Flow Measurement	<u>  </u> N Pretreatment
<u>  </u> M Records/Reports	<u>  </u> N Laboratory	<u>  </u> S Compliance Schedules
<u>  </u> M Operations & Maintenance	<u>  </u> M Effluent/Receiving Waters	<u>  </u> S Self-Monitoring Program
<u>  </u> M Facility Site Review	<u>  </u> M Sludge Storage/Disposal	<u>  </u> Other
<u>  </u> S Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated)

**D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)**

See attached inspection letter

  
Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

4/9/07  
Date

  
Timothy M Campbell, Reviewer, Ohio EPA, Southeast District Office

4/9/07  
Date