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Ohio EPA

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State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

Certified Mail #91 7108 2133 3932 4450 4155

June 30, 2008

C K Satyapriya, CEO
CTL Engineering
2860 Fisher Road
Columbus, OH 43204

**Re: CTL Engineering
NPDES permit: 4PX00006**

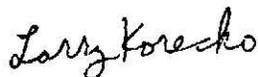
Dear Mr. Satyapriya:

Attached is Ohio EPA's Reconnaissance Inspection Report for the sewage treatment plant serving the CTL facility located at 2860 Fisher Road and operating under NPDES permit 4PX00006.

Note that several items in the Attachment section of the report **require a written response. Please respond in writing within 20 days of the receipt of this letter/report.**

Should you have any questions, please call me at 728-3846.

Sincerely,

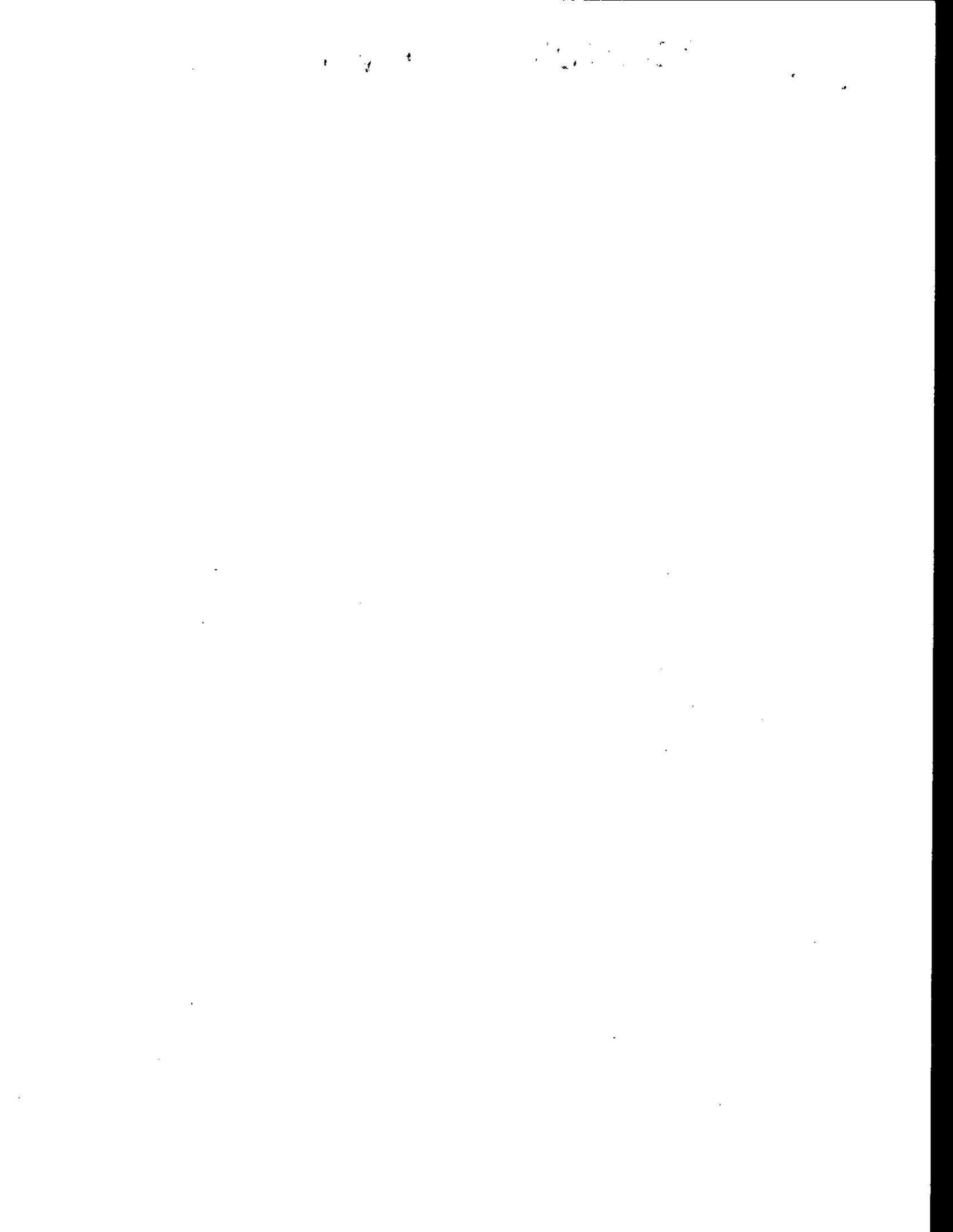


Larry Korecko
Environmental Specialist
Enforcement and Compliance
Division Surface Water
Central District Office

c: Ryan Oates, CTL

LK/nsm CTL Engineering 5-21-08 cover letter

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



NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Insp. Type	Inspector	Fac Type
4PX00006	OH0105970	08/05/21	R	S	2
Watershed	Scioto River				

Section B: Facility Data

Facility Name: CTL Engineering / ETI Corp	Entry Time	Permit Eff. Date
Address: 2860 Fisher Road		03/01/08
City/State/Zip: Columbus, Ohio 43204	Exit Time	Permit Exp. Date
		02/28/13

On-Site Representatives Contract Operator-

Name: Mark Winterstein, Ryan Oates
Title: CTL employees
Phone: 276-8123

Responsible Official

Name/Title: CK Satyapriya, CEO
Address: 2860 Fisher Road, Columbus, Ohio 43204
Phone: 276-8123

Section C: Areas Evaluated During Inspection:

(S=Satisfactory, U=Unsatisfactory, N=Not-Evaluated, Marginal)

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

Section D: Summary of Findings/Comments:

- * See Attachment for more details
- Submit monthly progress reports regarding connection to sanitary sewer
- Determine if Permit to Install needed from Ohio EPA
- Why have flows increased and have you determined if high ammonia wastes are entering sewage treatment plant?

Name of Inspector: Larry Koecko Ohio EPA, Central District Office

Signature: *Larry Koecko* **Date:** 6-26-08

Name of Reviewer: Erin Sherer Ohio EPA, Central District Office

Signature: *Erin Sherer* **Date:** 6-30-08

ATTACHMENT

General

The decision has been made to connect to the Columbus sanitary sewer. Information provided by CTL and its attorney indicate that if things go smoothly annexation may take place by late September 2008 and that sewer connection construction may be able to begin in July or August if there are no complications. **Have you obtained a statement from Columbus Sewers and Drains that this will be considered a sewer tap or is it considered a sewer extension? If it is a sewer extension, besides getting approvals and permits from the City of Columbus you will need to obtain a Permit to Install (PTI) from Ohio EPA. Please respond in writing.**

It is important in light of all the NPDES permit limit violations that CTL connect as quickly as possible. **I ask that CTL send me monthly progress reports on connection to sanitary sewer with the first report due July 15, 2008 and continuing every 30 days until connection is made. Please confirm in writing that CTL will do this.**

Effluent Violations

There continues to be many violations of NPDES permit limitations. These are listed on an attached page for the months of March 2007 through April 2008.

The fact that facility only samples quarterly makes these violations even more significant. It can be reasonably concluded that in the intervening months, violations are probably occurring.

Flow and Collection System

Average daily flow has exceeded design flow of sewage plant for 10 consecutive months (August 07 through May 08). **What measures if any have been attempted to lower the flow? Why did flow increase so substantially from May-June-July 2007 to August 2007? Please respond in writing.**

Operation and Maintenance

New filter sand from Mechanicsburg Sand & Gravel was put into the sand beds in February 2008.

The extremely high effluent ammonia value of 62.4 mg/l on June 1, 2007 suggests that either lab wastes or janitorial cleanup may be causing problems to the sewage treatment system. **Has this been looked into? Please respond in writing.**

CTL ENGINEERING

~~Get New Data~~

VIOLATIONS

JANUARY 2007 THROUGH MAY 2008

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PX00006*AD	March 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.6	3/1/2007
4PX00006*AD	March 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	11.6	3/1/2007
4PX00006*AD	March 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	.02	.03859	3/1/2007
4PX00006*AD	March 2007	001	00610	Nitrogen, Ammonia (NH3	7D Qty	.03	.03859	3/1/2007
4PX00006*AD	December 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	22.7	12/1/2007
4PX00006*AD	December 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	22.7	12/15/2007
4PX00006*AD	June 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	62.4	6/1/2007
4PX00006*AD	June 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	62.4	6/1/2007
4PX00006*AD	June 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	.01	.11148	6/1/2007
4PX00006*AD	June 2007	001	00610	Nitrogen, Ammonia (NH3	7D Qty	.01	.11148	6/1/2007
4PX00006*AD	June 2007	001	31616	Fecal Coliform	30D Conc	1000	5500.	6/1/2007
4PX00006*AD	June 2007	001	31616	Fecal Coliform	7D Conc	2000	5500.	6/1/2007
4PX00006*AD	June 2007	001	50060	Chlorine, Total Residu	1D Conc	.019	.1	6/1/2007
4PX00006*AD	June 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	6/1/2007
4PX00006*BD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.66	3/17/2008
4PX00006*BD	March 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.66	3/1/2008
4PX00006*BD	March 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	3/17/2008
4PX00006*AD	August 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	24.6	8/1/2007
4PX00006*AD	August 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	24.6	8/15/2007
4PX00006*AD	August 2007	001	00610	Nitrogen, Ammonia (NH3	30D Qty	.01	.24684	8/1/2007
4PX00006*AD	August 2007	001	00610	Nitrogen, Ammonia (NH3	7D Qty	.01	.24684	8/15/2007
4PX00006*AD	August 2007	001	80082	CBOD 5 day	30D Qty	.08	.09031	8/1/2007
4PX00006*AD	August 2007	001	50060	Chlorine, Total Residu	1D Conc	.019	.1	8/16/2007