

**Environmental
Protection Agency**

Rep. Schickel, Governor
Lee Fisher, Lt. Governor
Chris Komesar, Director

May 19, 2010

RE: EASTON SERVICE - CULLIGAN WATER
OHIO EPA PERMIT NO. 3IE00032
COLEBROOK TWP., ASHTABULA CO.
COMPLIANCE EVALUATION INSPECTION

Mr. Leland Easton, Secretary
Easton Service Inc.
DBA Culligan Water Conditioning
1427 U.S. Route 322 East
Orwell, OH 44076-9368

Dear Mr. Easton:

On April 27, 2010, a site inspection was conducted at the above referenced facility at 1427 U.S. Route 322 East, Colebrook Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you represented Easton Service Inc. during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on October 31, 2007.

You facility has two onsite wastewater treatment systems. One system accepts sanitary wastes from the office building and restroom in the shop, and consists of a 750 gallon septic tank and a 1,000 gallon septic tank in series, existing leach bed, dosing tank, and an evapo-transpiration field with a curtain drain. There is no discharge from this system evident from the inspection. The industrial wastewater treatment system consists of the backwash brine from softening water deionizing water, and green sand filters, and consists of five tanks in series each 4,000 to 5,000 gallons in capacity. There is no aeration and the system relies solely upon mechanical settling. The industrial wastewater flows through piping where it joins dilution water pumped from a nearby pond and groundwater from field tiles on the property in a manhole, and is discharged to an unnamed tributary of Mosquito Creek.

Observations

The following observations were made during the inspection.

1. The design flow of the industrial wastewater treatment system is 12,000 gpd for tank backwash and 5,000 gpd for regeneration. The plant was operating at the time of the inspection, producing a clear effluent.
2. A manhole located northeast of the office building combines the flows from the industrial wastewater effluent, ground water intercepted by field tiles installed in the 1950s, and a parking area catch basin.

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3. The specific conductance of the wastewater flow in the manhole was measured by Ohio EPA to be 1261 Umho/Cm. The meter is a YSI 33, A1897 and was calibrated at Ohio EPA Northeast District Office at 1.289 Umho/Cm.
4. The final discharge at the tributary to Mosquito Creek was not observed due to high flows and the discharge being submerged.
5. During the inspection you noted that you submit the flow rate, specific conductivity and pH readings, while Microbac reports remaining report data on the electronic discharge monitoring reports (eDMRs) on your behalf for this facility.

NPDES Permit Compliance Review

Easton Service Inc. operates under Permit 3IE00032*ED. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2007 through March 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00515	Residue, Total Dissolv	30D Conc	1500	1530.	8/1/2009
001	50060	Chlorine, Total Residu	1D Conc	0.019	.16	11/18/2009
001	50060	Chlorine, Total Residu	1D Qty	0.0022	.00727	11/18/2009
001	00515	Residue, Total Dissolv	1D Conc	3000	3840.	3/4/2009
001	00515	Residue, Total Dissolv	30D Conc	1500	2385.	3/1/2009

An explanation as to why these exceedances occurred must be provided.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

No "other" violations were noted for the reporting period reviewed.

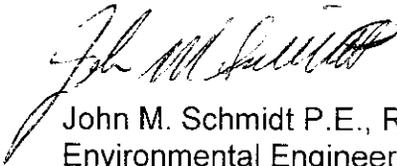
Based on the above information, Easton Service, Inc. is considered to be in substantial compliance with the terms and conditions of the NPDES permit. However, the above items must be addressed.

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Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

File: Industrial/Easton Service Inc. (Colebrook Twp.)/PC