



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

November 5, 2007

RE: TOWN AND COUNTRY CO-OP  
PERMIT NO. 3IG00085  
LORAIN COUNTY

Ms. Pamela Gray  
Elyria Site Manager  
Town and Country Co-op, Inc.  
210 Huron St.  
Elyria, Ohio 44035

Dear Ms. Gray:

On October 25, 2007, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Dave Mole and you. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The manhole where the oil/water separator discharge pipe and two other pipes empty into was examined. No oil sheen was observed.
2. Northcoast Lab provides sample containers with preservative in them.
3. The samples are iced down and shipped overnight to the laboratory or sometimes the laboratory will pick them up.
4. Based on previous correspondence, the stormwater samples from the oil/water separator are now being collected by a swing sampler. The samples are collected in plastic containers which have been purchased for the swing sampler. The samples are then transferred into their respective sample containers supplied by the lab. **This collection method is not acceptable for the collection of oil & grease and chemical oxygen demand (COD). Oil & grease and COD samples should never be collected in a plastic container.** For accurate results, the sample should be collected directly into a glass sample container. You indicated that the containers purchased were the ones that fit the swing sampler. Glass containers which fit the swing sampler should be purchased or the swing sampler should be modified so that the glass sample containers the laboratory supplies fit. Previously, you indicated that the sample containers supplied by the laboratory were not used because the laboratory supplies the containers with the preservative already in them and the preservative splashes out during sampling. This can be prevented by having the laboratory provide ampoules of the appropriate preservative. The preservative can then be added after the sample is collected.

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5. Although there are no numerical limits for total suspended solids, several of the values being reported are excessively elevated (742mg/l). Better house keeping operations in the areas where the oil/water separator collects the stormwater should help reduce the total suspended solids in the effluent. Continued instances of elevated total suspended solids may require the installation of a solids control device.

This office has recently reviewed your self-monitoring reports covering the period October 1, 2006 thru September 30, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instance of noncompliance is as follows:

<b>Violation Date</b>	<b>Station</b>	<b>Reporting Code</b>	<b>Parameter</b>	<b>Sample Frequency</b>	<b>Expected</b>	<b>Reported</b>
8/1/2007	001	00400	pH	1/Month	1	0

No Limit violations were noted.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at 330-963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS:bo