



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 11, 2008

RE: SPREAD EAGLE TAVERN
10150 HISTORIC PLYMOUTH ST.
HANOVER TWP.
COLUMBIANA COUNTY

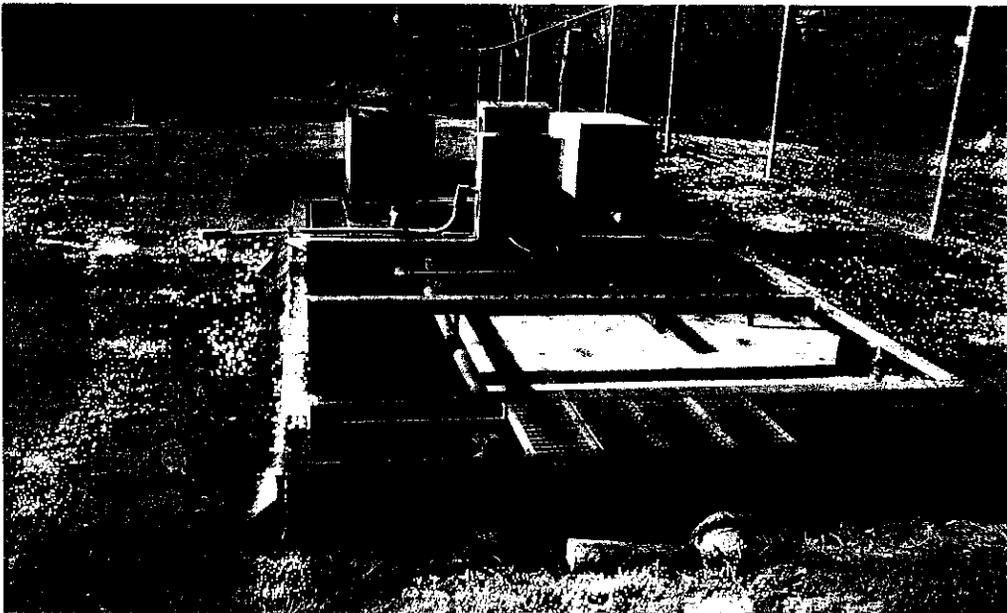
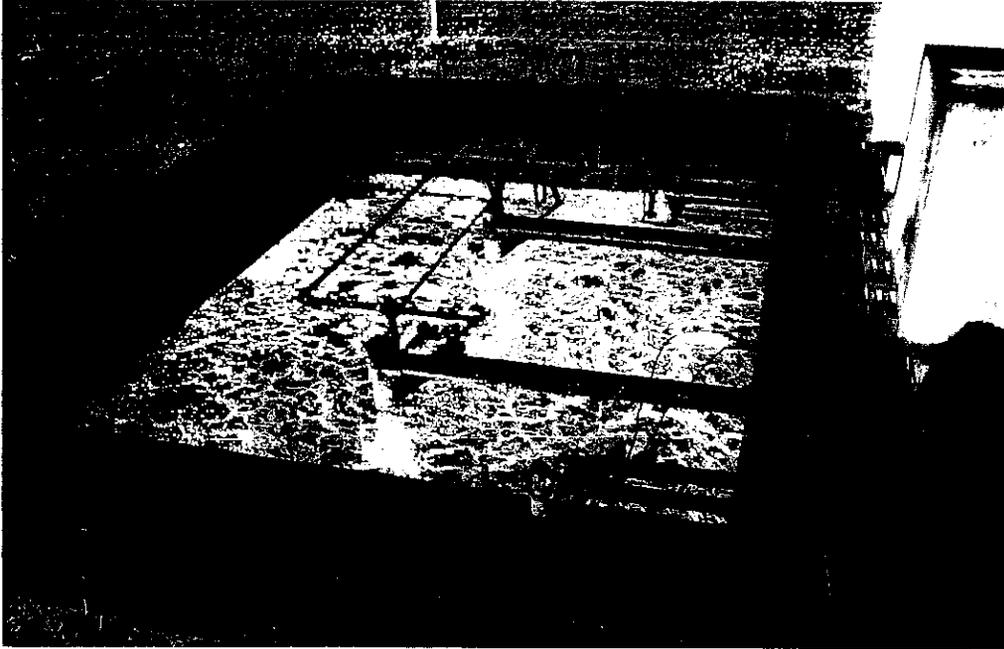
Mr. David Johnson
c/o Summitville Tile Company
State Route 644
Summitville, OH 43692

Dear Mr. Johnson:

On January 22, 2008, this office received a comment letter regarding the draft National Pollutant Discharge Elimination System (NPDES) permit for the Spread Eagle Tavern. The following are the responses to your concerns:

1. Since the Columbiana County Engineers are currently running this plant the Class I licenses are appropriate. Their staff currently exceed the Class I requirement. Also, past operations at this facility (see our previous inspection letters) warrant a Class I licenses. This is not a standard plant with carbon filters and therefore more complex than the typical plants this size. Furthermore, any current staff at the restaurant would have to meet the following to qualify for the Class A licenses: *the operator must have been designated by the owner of the wastewater treatment works to make decisions regarding the daily operational activities of the specific class A wastewater treatment works for at least the twelve month period immediately preceding the date the complete application.* This will be a first time permit at this location and the plant has no documented history of compliance. If at the end of this permit cycle the plant has a good compliance history this office would not object to converting to a Class A licenses, provided the restaurant has personnel that qualify.
2. The comment regarding "daily observations" of plant effluent and less mandatory time at the plant site is mute since daily oversight is necessary for the plant to achieve compliance with NPDES permit limits. The time required by operators is only for sampling and adjustments to the system for compliance. The day to day activities, checking mechanical equipment, adjusting sludge pumps, checking the clarifier, scraping the hopper, etc., must be completed by maintenance staff. Since somebody must be at the plant for daily maintenance, the daily observations are no burden. All plants this size have these parameters. If this facility does not have a flow meter, then elapsed time meters must be installed on the dosing pumps. This value must also be recorded daily for permit monitoring, except those times when the plant is not normally staffed.
3. The grease trap has been an on-going issue. The following are pictures from the April 19, 2007 inspection:

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This office considers this a grease problem. Mr. Flory indicated that the discrepancy in the ratio of the grease to the available food entering the plant was the problem. Aerated treatment plants are not designed to remove grease. Grease removal is a physical process and must be accomplished prior to the aeration tank. The Ohio EPA design manual for small treatment systems where public sewers are not available, "Sewage: Collection, Treatment, and Disposal" (green book) requires the installation of a scum tank to remove grease from the system. Page 17, final settling tanks, item nine; scum skimmers for food service operations must discharge to a separate scum holding tank of at least 500 gallons, but not less than 5 percent of the food service daily hydraulic flow

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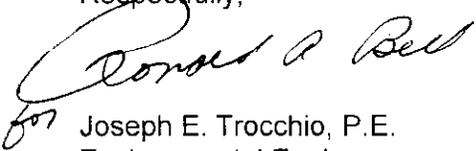
and be provided with a means of recirculating the subnatant to the aeration tank. This is done to remove grease from the system since it cannot be treated by the aeration tank. Also, in the Ohio EPA guidance for operation and maintenance of package extended aeration treatment plants, page six, "excessive grease or scum must be removed from the plant", and hauled away. This office can find no reference that the aeration system will treat grease; furthermore, our original suggestion to remove it at the restaurant would be best. This office will evaluate any proposal to remove grease from the system. A copy of the operation and maintenance manual has been included for your reference.

4. Mr. Flory suggested the installation of time lapsed meters on the dosing pumps. As indicated above this office agrees with this suggestion and is necessary for flow monitoring for the NPDES permit. The flow data with some influent monitoring results will give an accurate indication of the loading on the plant.
5. The district has concerns with the "grease-eating" enzymes. Our concern is that the grease is dispersed long enough to pass through the plant and then reform in the stream. A complete review of the product should be done and an evaluation of other facilities using it before its use at this location.

The final issue was to delay issuing the NPDES permit until arrangements could be made for the Columbiana County Engineers could take over ownership of the plant. This facility should have had a permit under Chapter 6111 of the Ohio Revised Code for the last 17 years. There does not need to be any delay since if the county decides to take over ownership of the plant it is a simple matter to apply for a permit transfer. This transfer does not have any associated fees and is simple one page form.

If we can be of any further assistance in this matter you may contact this office at (330) 963-1193 to discuss any questions you may have.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

enclosures

cc: Lori J. Barnes, Columbiana County Health Dept.
Don Harrison, Columbiana County Engineers
Troy Graft, P.E., P.S., Columbiana County Engineers

ec: Ronald A. Bell, Enforcement Coordinator, Ohio EPA, DSW, NEDO

File: Semipublic/Columbiana County/Hanover Township/Spread Eagle Tavern

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Sent To **DAVID JOHNSON**
 Street, Apt. No., or PO Box No. **C/O SUMMITVILLE TILE CO**
 City, State, ZIP+4 **SPREAD EAGLE TAVERN**