

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 3, 2011

RE: CHARM RABER GENERAL STORE
OHIO EPA PERMIT 3PR00415
CLARK TOWNSHIP, HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Ed Raber, Owner
Charm Corporation, Inc.
P.O. Box 25
Charm, OH 44617

Dear Mr. Raber:

On April 27, 2011, a site inspection was conducted at the above referenced facility at 4456 State Route 557, Clark Township, Holmes County. The inspection was conducted by John Schmidt and John Kwolek of this office and Kraig Bucklew of the Holmes County Health Department. Nobody represented Charm Corporation, 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 April 13, 2010.

The system consists of a 1500 gallon flow equalization tank, 500 gpd Orencotm fixed media aeration system, and ultraviolet disinfection. The facility discharges to Doughty Creek south of the facility. No backup power is provided to the facility and the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the treatment system is 500 gallons per day. The plant operates intermittently, with the Orenco system operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. Dean's Backflow Service is listed as the contract operator of record for this facility.
3. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.
4. The overall condition of the treatment plant during this inspection was acceptable in terms of operating condition with the plant is not being properly maintained.

Mr. Ed Raber
Charm Corporation, Inc.
May 3, 2011
Page 2

During the inspection approximately half of the diffusers were inoperable due to plugging. The diffusers which were operating were heavily coated in sludge. The diffusers should be inspected during each visit by your operator, and diffusers need to be cleaned as often as necessary to ensure proper operation.

5. The dosing pumps were cycled and found in operating condition.
6. The ultraviolet disinfection system was not examined due to the inspection occurring outside the disinfection season of May through October. The tank contents were clear, but had a heavy ammonia odor.
7. The final discharge to Doughty Creek south of the plant was observed as discharging. The final effluent was clear and had a strong ammonia odor, and a significant amount of green slime growth had formed at the discharge.
8. Samples are collected by Dean's Backflow Service. Dean's Backflow Service personnel perform on-site analysis of pH and dissolved oxygen, as well as perform observations of flow, color, odor, and turbidity on days they are at the plant. Nobody collects required daily observations of flow, color, odor, and turbidity on days when Dean's Backflow Service is not at the plant.
9. Cosh Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
10. Kevin Dean submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of Homestead Restaurant, Inc. through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

Charm Corporation, Inc. (Charm) operates the Charm-Raber General Store wastewater plant under expired Permit 3PR00415*AD. Charm has submitted an NPDES renewal application to Ohio EPA, but the permit has not been processed due to ongoing compliance issues with the facility. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2010 through April 1, 2011 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 reporting period reviewed:

Mr. Ed Raber
 Charm Corporation, Inc.
 May 3, 2011
 Page 3

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	1000	1200.	5/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.12	5/18/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.96	5/25/2010
001	31616	Fecal Coliform	30D Conc	1000	2100.	6/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.04	6/1/2010
001	31616	Fecal Coliform	7D Conc	2000	2100.	6/8/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.76	6/8/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.81	6/15/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.18	6/22/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.27	7/6/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.61	7/13/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.41	7/20/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.68	7/27/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.94	8/3/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.51	8/9/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.26	8/17/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.81	9/9/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.04	9/16/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.87	9/23/2010
001	00530	Total Suspended Solids	30D Qty	0.023	.02498	10/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.13	10/5/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.84	10/12/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.66	10/19/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.47	10/26/2010
001	00530	Total Suspended Solids	30D Conc	12	21.	11/1/2010
001	00530	Total Suspended Solids	30D Qty	0.023	.04769	11/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.51	11/2/2010
001	00530	Total Suspended Solids	7D Conc	18	21.	11/8/2010
001	00530	Total Suspended Solids	7D Qty	0.034	.04769	11/8/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.74	11/9/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.81	11/16/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.47	11/22/2010
001	00610	Nitrogen, Ammonia	30D Conc	3.0	3.82	12/1/2010
001	00610	Nitrogen, Ammonia	30D Qty	0.0056	.00868	12/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.31	12/7/2010
001	00610	Nitrogen, Ammonia	7D Qty	0.0085	.00868	12/8/2010
001	00610	Nitrogen, Ammonia	30D Conc	3.0	3.36	1/1/2011
001	00610	Nitrogen, Ammonia	30D Qty	0.0056	.00763	1/1/2011
001	00610	Nitrogen, Ammonia	30D Conc	3.0	17.6	2/1/2011
001	00610	Nitrogen, Ammonia	30D Qty	0.0056	.03997	2/1/2011
001	00610	Nitrogen, Ammonia	7D Conc	4.5	17.6	2/8/2011
001	00610	Nitrogen, Ammonia	7D Qty	0.0085	.03997	2/8/2011
001	00610	Nitrogen, Ammonia	30D Conc	3.0	15.1	3/1/2011

Mr. Ed Raber
Charm Corporation, Inc.
May 3, 2011
Page 4

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia	7D Conc	4.5	15.1	3/1/2011
001	00610	Nitrogen, Ammonia	30D Qty	0.0056	.03429	3/1/2011
001	00610	Nitrogen, Ammonia	7D Qty	0.0085	.03429	3/1/2011
001	80082	CBOD 5 day	30D Conc	10	14.	3/1/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	5.87	3/1/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	5.12	3/8/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	1.17	3/18/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	4.76	3/22/2011

Ohio EPA notes that this facility has been largely unable to meet its NPDES permit limits for ammonia, suspended solids, dissolved oxygen, and bacteria from the date of installation. This has been acknowledged between Ohio EPA and Charm. As noted during the April 2010 inspection, the compliance history of this facility continues to place Charm in significant noncompliance.

Pursuant to a telephone call with this office, in 2010 you initially indicated that you were pursuing the purchase of property to convert the system from a discharging system to a system that discharges to an onsite leach bed or other soil dissipation system, with plant modifications envisioned for the summer of 2010. Ohio EPA understands that currently there are discussions about providing sewerage to the Charm area, thus eliminating the need for an onsite or discharging system. Based upon discussions with neighboring Keim Lumber, it appears that any sanitary sewers for Charm may be several years away. Therefore, Ohio EPA will expect that you will follow through with your plan to

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Reporting Violations

No reporting code or reporting frequency violations were noted for the reporting period reviewed.

Compliance Schedule Violations

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

Mr. Ed Raber
Charm Corporation, Inc.
May 3, 2011
Page 5

Other Violations

Ohio EPA notes that Part II, Item J of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. Ohio EPA's files reflect that Charm Corporation has never submitted this report since the NPDES permit was issued in 2005. Please submit the report as prescribed by your NPDES permit.

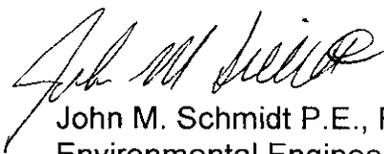
NPDES Permit Status

Ohio EPA notes that Charm Corporation has submitted its NPDES renewal application for the Raber General Store, with the renewal application received on May 28, 2010. As long as Charm Corporation remains in significant noncompliance with its current permit, Ohio EPA cannot process the renewal application. If sanitary sewers are provided or Charm Corporation converts the discharging system to an onsite system discharging into the ground, then Ohio EPA can issue a no permit required.

Based on the above information, Charm Corporation, Inc. is considered to be in significant noncompliance with the terms and conditions of its NPDES permit for your Charm-Raber General Store facility. **Please provide Ohio EPA with an update of either abandoning this system and connecting to sanitary sewers or a schedule of eliminating the discharge from this system by connecting to an on-site dissipation system (leach bed, drip distribution) through the Holmes County Health Department.**

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

pc: Kraig Bucklew, Holmes County Health Department
Kevin Dean, Dean's Backflow Service

File: Semipublic/Holmes/Clark Twp/Charm-Raber General Store (3PR00415)