

**Environmental
Protection Agency**

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

May 3, 2011

RE: BELLSTORES MILLERSBURG WEST
OHIO EPA PERMIT 3PR00195
HARDY TOWNSHIP, HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Robert D. Engel, Vice President
Campbell Oil Company, Bellstores, Inc.
P.O. Box 907
Massillon, OH 44648

Dear Mr. Engel:

On April 27, 2011, a site inspection was conducted at the above referenced facility at 8490 State Route 39, Hardy 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 Campbell Oil Company / Bellstores, 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 630 gallon trash trap, 2,500 gpd extended aeration system with clarifier, 1500 gallon lift station/dosing chamber, surface sand filtration, chlorine disinfection, dechlorination, and post-disinfection aeration. Sludge management consists of sludge removal from a 1500 gallon aerated sludge holding tank when needed to another POTW. The facility discharges to storm sewers along State Route 39 north to the facility and ultimately to Sapps Run. 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 extended aeration plant is 2,100 gallons per day. The extended aeration plant operates on a timer, with the sand filter operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. Ohio EPA records do not indicate an operator of record for this facility. From information provided to Ohio EPA, Dean's Backflow Service is apparently acting as the operator of record.
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 satisfactory with the exception of the sand filters.
5. Collected trash was containerized for disposal at a solid waste landfill.

6. The content of the aeration tank had a dark brown to grey color and good mixing. Sludge returns were a dark brown color with minimal foaming. This is an indication of a plant that may need solids wasted from the system. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The surface sand filter doing pumps discharge to the filters when enough water accumulates to pump. The pumps were tested and found operable. The alarms were tested and found in operating condition.
8. The surface of the clarifier was reasonably clear. Effluent channels and weirs were reasonably clean. The sludge return lines were cycled and found operating properly at the time of the inspection. The skimmer was activated and found in operable condition at the time of the inspection.
9. Surface sand filters were not in acceptable condition. The east sand filter was noted as plugged with turbid water and overflowing the wall at the distribution box when the dosing pumps were activated. During the inspection, the flow was diverted to the west sand filter. The effluent discharged to the west sand filter during the inspection was clear and free of color and turbidity. The wastewater does not percolate freely through the sand indicating that the beds are clogged. Sludge was noted as mixed in with the filter media, requiring the sand filter media to be replaced.
10. Chlorination and dechlorination systems were examined and found not stocked with the appropriate chemicals. The disinfection system must be operable prior to the commencement of the disinfection season (May 1). The tank contents were turbid, and the tank needs to be cleaned of vegetation and leaves.
11. The final discharge to the storm sewer manholes was observed as not discharging.
12. Samples are collected by Dean's Backflow Service. Dean's Backflow Service personnel perform on-site analysis of pH and DO and 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.
13. Ohio EPA notes that sludge has not been removed from this facility since 2006. Sludge should be removed from the facility at least annually.
14. Cosh Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
15. Kevin Dean submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of Bellstores, Inc. through Ohio EPA's Web-based application.

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NPDES Permit Compliance Review

Campbell Oil Company / Bellstores, Inc. operates the Bellstores Millersburg West wastewater plant under Permit 3PR00195*CD. 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:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	9.17	8/1/2010
001	00610	Nitrogen, Ammonia (NH3-N)	30D Qty	0.008	.03471	8/1/2010
001	00610	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	9.17	8/8/2010
001	00610	Nitrogen, Ammonia (NH3-N)	7D Qty	0.0012	.03471	8/8/2010
001	00610	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	8.3	3/1/2011
001	00610	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	8.3	3/1/2011
001	80082	CBOD 5 day	30D Conc	10	24.	3/1/2011
001	80082	CBOD 5 day	7D Conc	12	24.	3/1/2011

These effluent limit violations should be explained, along with measures to ensure that they are not repeated.

Reporting Violations

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

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.

Compliance Schedule Violations

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

Other NPDES Permit Violations

Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Part II, Item B requires you to designate an operator of record and notify Ohio EPA of the designated operator of record. Ohio EPA understands that Campbell Oil Company / Bellstores, Inc. contracts with Dean's Backflow Service as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this

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facility. I have attached an operator of record form which must be completed and returned to Ohio EPA at the address listed on the form. As a courtesy, please provide a copy of this form in your response to this office.

Annual Sludge Report

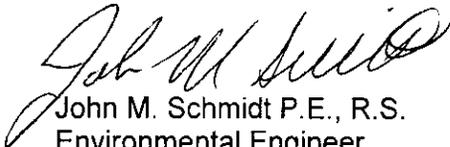
Ohio EPA notes that Part II, Item K of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. Ohio EPA's files reflect that Charm Corporation has never submitted this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

Based on the above information, Campbell Oil Company / Bellstores, Inc. is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its Bellstores Millersburg West facility; however the above items must be addressed.

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

att: Operator of Record Notification Form, rev 02/2008

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

File: Semipublic/Holmes/Hardy Twp/Bellstores – Millersburg West (3PR00195)