



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korieski, Director

October 22, 2010

RE: BUCKEYE DELI
OHIO EPA PERMIT 3PR00447
WASHINGTON TWP., HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Steve Miller
Buckeye Deli
122 State Route 39
Nashville, OH 44661

Dear Mr. Miller:

On October 19, 2010, a site inspection was conducted at the above referenced facility at 122 State Route 39, Washington Township, Holmes County. The facility is owned by Steve Miller, dba Buckeye Deli and operated by Kevin Dean of Dean's Backflow Service. The inspection was conducted by John Schmidt of this office, as well as Kraig Bucklew and Vaughn Anderson of the Holmes County Health Department. 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 29, 2008.

The system consists of a trash trap, extended aeration system with clarifier. Sludge management consists of sludge removal from the clarifier when needed to another POTW. The facility discharges to a storm sewer which flows to Crab Run south of the facility. No backup power is provided to the facility and the facility is provided with no alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 1,500 gallons per day. The extended aeration plant operates continuously. The plant was not discharging at the time of the inspection.
2. The grease trap needs to be cleaned out.
3. The content of the aeration tank had a slight septic odor, medium brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. The plant color and aeration is an indicator of an improperly operating aeration system.
4. The surface of the clarifier was full of grease (see attached pictures). Effluent channels and weirs were in need of cleaning. The sludge return lines were operating properly at the time of the inspection, however the return lines indicate that the clarifier needs to be scraped to divert the sludge to the bottom of the hopper.

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5. The rock filter was full of solids carryover from the final clarifier. This needs to be cleaned immediately.
6. The final discharge pipe at the catch basin to the southeast of the property was not observed due to an accumulation of leaves and other debris in the catch basin (see attached pictures).
7. Ohio EPA understands that Kevin Dean of Dean's Backflow Service monitors the facility, and performs the routine sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

Buckeye Deli WWTP operates under Permit 3PR00447*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 through October 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 reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	1D Conc	18	25.	12/1/2008
001	00530	Total Suspended Solids	30D Conc	12	25.	12/1/2008
001	80082	CBOD 5 day	1D Conc	15	17.	12/1/2008
001	80082	CBOD 5 day	30D Conc	10	17.	12/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	4.32	12/1/2008
001	00530	Total Suspended Solids	1D Conc	18	84.	6/2/2010
001	00530	Total Suspended Solids	30D Conc	12	84.	6/1/2010
001	00530	Total Suspended Solids	1D Qty	0.10	.19076	6/2/2010
001	00530	Total Suspended Solids	30D Qty	0.068	.19076	6/1/2010
001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	22.5	6/2/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	22.5	6/1/2010
001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.0085	.0511	6/2/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.0057	.0511	6/1/2010
001	31616	Fecal Coliform	30D Conc	1000	2600.	6/1/2010
001	31616	Fecal Coliform	7D Conc	2000	2600.	6/1/2010
001	80082	CBOD 5 day	1D Conc	15	72.	6/2/2010
001	80082	CBOD 5 day	30D Conc	10	72.	6/1/2010
001	80082	CBOD 5 day	1D Qty	0.085	.16351	6/2/2010
001	80082	CBOD 5 day	30D Qty	0.057	.16351	6/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	1.31	6/2/2010
001	00530	Total Suspended Solids	1D Conc	18	66.	8/9/2010
001	00530	Total Suspended Solids	30D Conc	12	66.	8/1/2010

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	1D Qty	0.10	.14989	8/9/2010
001	00530	Total Suspended Solids	30D Qty	0.068	.14989	8/1/2010
001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	3.25	8/9/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.25	8/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.0057	.00738	8/1/2010
001	80082	CBOD 5 day	1D Conc	15	34.	8/9/2010
001	80082	CBOD 5 day	30D Conc	10	34.	8/1/2010
001	80082	CBOD 5 day	30D Qty	0.057	.07721	8/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	1.19	8/2/2010
001	00530	Total Suspended Solids	1D Conc	18	37.	8/3/2009
001	00530	Total Suspended Solids	30D Conc	12	37.	8/1/2009
001	00530	Total Suspended Solids	30D Qty	0.068	.08403	8/1/2009
001	31616	Fecal Coliform	30D Conc	1000	10400.	8/1/2009
001	31616	Fecal Coliform	7D Conc	2000	10400.	8/1/2009
001	80082	CBOD 5 day	1D Conc	15	32.	8/3/2009
001	80082	CBOD 5 day	30D Conc	10	32.	8/1/2009
001	80082	CBOD 5 day	30D Qty	0.057	.07267	8/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	1.36	8/3/2009
001	00530	Total Suspended Solids	1D Conc	18	88.	12/2/2009
001	00530	Total Suspended Solids	30D Conc	12	88.	12/1/2009
001	00530	Total Suspended Solids	1D Qty	0.10	.19985	12/2/2009
001	00530	Total Suspended Solids	30D Qty	0.068	.19985	12/1/2009
001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	11.	12/2/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.	12/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.017	.02498	12/1/2009
001	80082	CBOD 5 day	1D Conc	15	29.	12/2/2009
001	80082	CBOD 5 day	30D Conc	10	29.	12/1/2009
001	80082	CBOD 5 day	30D Qty	0.057	.06586	12/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	1.36	12/2/2009
001	00530	Total Suspended Solids	1D Conc	18	30.	3/1/2010
001	00530	Total Suspended Solids	30D Conc	12	30.	3/1/2010
001	00530	Total Suspended Solids	30D Qty	0.068	.06813	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	26.5	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	26.5	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.026	.06018	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.017	.06018	3/1/2010
001	80082	CBOD 5 day	30D Conc	10	13.	3/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	3.31	3/4/2010
001	00530	Total Suspended Solids	1D Conc	18	39.	3/2/2009
001	00530	Total Suspended Solids	30D Conc	12	39.	3/1/2009
001	00530	Total Suspended Solids	30D Qty	0.068	.08857	3/1/2009
001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.79	3/2/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.79	3/1/2009

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	1D Conc	15	30.	3/2/2009
001	80082	CBOD 5 day	30D Conc	10	30.	3/1/2009
001	80082	CBOD 5 day	30D Qty	0.057	.06813	3/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.03	3/5/2009
001	00530	Total Suspended Solids	1D Conc	18	57.	6/1/2009
001	00530	Total Suspended Solids	30D Conc	12	57.	6/1/2009
001	00530	Total Suspended Solids	1D Qty	0.10	.12945	6/1/2009
001	00530	Total Suspended Solids	30D Qty	0.068	.12945	6/1/2009
001	80082	CBOD 5 day	1D Conc	15	22.	6/1/2009
001	80082	CBOD 5 day	30D Conc	10	22.	6/1/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	.98	6/11/2009

These effluent limit violations should be explained, along with specific 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. E-mailing 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

The following compliance schedule violations were noted for the reporting period reviewed:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
01/01/2007	12/31/2011	07/01/2007	08/14/2008	1799	Construction	Complete Plans and Specs
01/01/2007	12/31/2011	01/01/2008	Not Started	3099	Construction	Begin Construction
01/01/2007	12/31/2011	05/01/2008	Not Started	4599	Construction	Complete Construction
01/01/2007	12/31/2011	07/01/2008	Not Started	5699	Construction	Attain Compliance with Final Limits

Please provide Ohio EPA with the dates that construction commenced and was completed for the surface sand filters and ultraviolet disinfection systems approved through PTI 665117 on September 5, 2008. The missed compliance deadlines should be explained.

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Based on the above information, you are considered to be in marginal compliance with the terms and conditions of its NPDES permit for your Buckeye Deli WWTP; however the above items must be addressed.

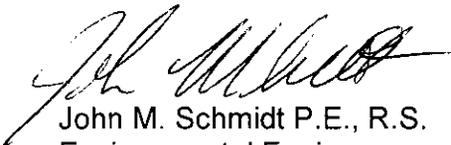
Comments

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. Ohio EPA understands that Buckeye Deli contracts with Deans Backflow Services as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA.

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

File: Semipublic/Holmes/Washington Twp/Buckeye Deli



Accumulation of Grease in Final Clarifier



Catch Basin for Final Discharge