



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 19, 2012

RE: GEAUGA COUNTY
MUNSON TWP
MAC'S CONVENIENCE STORE, CIRCLE K
11800 MAYFIELD RD

Ms. Susan Moore, AIA
Arkinetics
3723 Pearl Road
Cleveland, Ohio 44109

Dear Ms. Moore:

On April 11, 2012, this writer met with you to conduct an inspection of the sewage treatment plant serving the above referenced facility. The intent of the inspection was to assess the operations and maintenance of the treatment system for compliance with the National Pollutant Discharge Elimination System (NPDES) permit.

The facility has recently undergone a change in ownership. The new owner of the facility is planning to remodel the interior of the building. According to information submitted to this Agency, the remodel will include new food equipment (pop fountains) which would require floor drains. It is understood the floor drains for the pop fountains will be directly connected to the pop fountains. The drains will not be connected to any type of trench drain or interior floor drain within the store.

According to Agency records, the wastewater treatment system was installed under Ohio EPA permit-to-install (PTI) No. 02-20458, which was effective March 16, 2005. The wastewater system includes a 500-gallon trash trap (existing from previous system), a 1,600-gallon aeration tank, a final settling tank, a 150-gallon dosing tank, a 74 square foot surface sand filter, a 345-gallon chlorination/dechlorination tank. Below are the findings and recommendations from the inspection:

INSPECTION SUMMARY

The wastewater treatment system is located adjacent to the store and a parking lot for a car repair shop. The treatment system is currently not fenced in and therefore is subject to tampering and potential damage from cars. It is recommended the treatment system be fenced in to prevent any potential damage to the treatment units.

The aeration tank appeared to be provided with adequate air supply and the contents of the tank were a dark brown color. The sludge return line was in operation. The settling chamber appeared clear with minimal solids accumulation on the surface of the tank. The skimmer was set beneath the surface of the water and should be located within 1/8-inch from the surface of the water. The effluent weir was free of any solids accumulation.

This facility hauls solids offsite for further treatment/handling. At the time of the inspection, it was not known what hauler is used and where the solids are hauled. This information must be obtained and forwarded to this office. According to your NPDES permit, you are permitted to haul solids to another NPDES permitted facility. You are currently not permitted to land apply solids to fields. If the hauler you are currently using land applies your solids, you must cease this activity immediately as this is a violation of your NPDES permit and subject to enforcement action by this office.

The dosing station appeared to be in good condition. The surface sand filters were in satisfactory condition. The south sand filter was in use and had some vegetative growth present. The north sand filter was in adequate condition. The sidewalls of the surface sand filter showed signs of deterioration and must be fixed. These cracks could potentially cause irreversible structural damage to the filter, which could prevent effective treatment of the wastewater.

The chlorination system was not in operation because it is outside the disinfection season. The chlorination system appeared to be intact but the dechlorination system is missing. Your NPDES permit contains both chlorine and bacteria limits which require you to chlorinate (and subsequently dechlorinate) from May through October each year. The final effluent from the wastewater treatment plant looked satisfactory.

NPDES PERMIT COMPLIANCE

According to discharge monitoring report data, the flow to the wastewater plant over the past three years averaged 2000 gpd. The discharge monitoring data shows the same flow of 2000 gallons has been reported every day for over a year. More recently, the flow monitoring has not been reported as the flow meter has been out of service for over two months. Flow monitoring is a requirement in the NPDES permit and must be reported. The NPDES permit for this facility requires flow to be monitored once a day with an estimate.

Upon further review of your NPDES permit, it was noted a compliance schedule is located within Part I, C of the current NPDES permit. The compliance schedule is for the submittal of a PTI for the installation of dechlorination at this facility. The compliance schedule also includes an evaluation of your disinfection facilities for compliance with the new e.coli bacteria limit. The new e.coli bacteria limit will be in the final effluent limits and monitoring requirements table (outfall 001). A copy of your compliance schedule has been attached to this letter.

Your wastewater treatment system qualifies as a Class A Wastewater Treatment system. Our records indicate Steve Howe, Charles Newman and Donald Velisek of AKE laboratory are the certified operator of record (ORC) for this facility. The wastewater treatment plant log book was located onsite in a mailbox at the treatment plant. The log book was reviewed during the inspection and found to be in satisfactory condition.

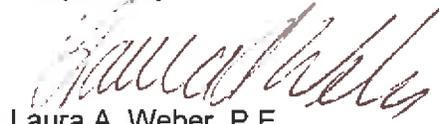
VIOLATION SUMMARY

No wastewater treatment plant discharge and frequency violations were noted for the period of January 1, 2009 through April 1, 2012.

MAC'S CONVENIENCE STORE, CIRCLE K
APRIL 19, 2012
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Should you have any comments or questions regarding this letter, please contact this office at (330)963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

cc: AKE Environmental & Construction Services, Inc.
Dave Sage, Geauga County Health Department

Part I, C - Schedule of Compliance

Municipal Construction Schedule

This entity shall attain compliance with the final effluent limitations of the permit as expeditiously as practicable, but not later than the dates developed in accordance with the following schedule:

- a. Submit detail plans for dechlorination facilities at the wastewater treatment plant as soon as possible, but not later than 5 months from the effective date of this permit .
(Event Code 01299)
- b. Commence construction as soon as possible, but not later than eight months from the effective date of this permit. (Event Code 03099)
- c. Notify the appropriate Ohio EPA District Office within seven days of construction initiation
- d. Complete construction as soon as possible, but not later than ten months from the effective date of this permit. (Event Code 04599)
- e. Attain operational level of the treatment works and meet final effluent limitations as soon as possible, but not later than twelve months from the effective date of this permit.
(Event Code 05599)

E.coli Monitoring and Limits

1. The permittee shall evaluate the ability of its existing treatment facilities to meet the final effluent limit for E. coli at outfall 3PR00525001.
2. Six months from the effective date of this permit, the permittee shall submit to the Ohio EPA Northeast District Office a brief status report on the ability of its existing treatment facilities to meet the final effluent limit for E. coli. (Event Code 95999)
3. If the permittee determines that its existing treatment facilities are not capable of meeting the final effluent limit for E. coli, not later than 8 months from the effective date of this permit, the permittee shall submit an approvable Permit To Install for plant improvements necessary to meet the final effluent limit for E. coli.
4. Not later than twelve months from the effective date of this permit, the permittee shall achieve the final effluent limit for E. coli at outfall 3PR00525001. (Event code 05699)
5. The permittee shall notify the Ohio EPA Northeast District Office in writing within 7-days of achieving compliance with the final effluent limit for E. coli.