



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 16, 2012

RE: STARLITE LOUNGE AND BANQUET HALL
OHIO EPA PERMIT 3PR00543
GENEVA TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Randy Brooks, Owner
RL Holdings, LLC
3978 North Broadway
Geneva, OH 44041

Dear Mr. Brooks:

On July 12, 2012, a site inspection was conducted at the above referenced facility at 3750 North Broadway, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Marlene Knopsnider represented Lewis Wastewater Management, the contract operator, and Randy Brooks represented RL Holdings, LLC, owner, 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 December 29, 2011.

The system consists of a 450-gallon trash trap, followed by two 2,000-gallon septic tanks in series, a 2,000-gallon holding/recirculation tank, 675 SF recirculating sand filter, and an ultraviolet disinfection system. The system has a design flow of 1,140 gpd. The system discharges to Cowles Creek east 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 plant operates intermittently, with the recirculating sand filter operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. As of February 14, 2012, the plant is operated by Marlene Knopsnider and Dustin Lewis of Lewis Wastewater Services on behalf of RL Holdings, LLC.
3. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. The log book is compliant with Ohio Administrative Code (OAC) 3745-7-09.
4. The overall condition of the treatment plant during this inspection was satisfactory.
5. The trash trap was functioning properly during the inspection. Collected trash was containerized for disposal at a solid waste landfill.
6. The alarms were tested and found in operating condition.
7. The ultraviolet disinfection system was examined and found in operating condition.

8. The final discharge to Cowles Creek east of the plant was observed as discharging, with the discharge observed as of acceptable visual quality. The outfall signage has been posted.
9. Marlene Knopsnider performs on-site analysis of pH and dissolved oxygen, as well as performs observations of flow, color, odor, and turbidity. Lewis Wastewater Management performs laboratory analysis of collected samples.
10. Lewis Wastewater Management submits the data to Ohio EPA's electronic discharge monitoring report (eDMR) system on behalf of Starlite Lounge through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

A review of the eDMRs received by Ohio EPA for the period December 1, 2011 through June 1, 2012 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Effluent Limit Violations

No effluent limit violations were noted for the time period reviewed.

Reporting Violations

Ohio EPA notes that the December 2011, January 2012, and February 2012 eDMRs were not submitted to the agency, and the May 2012 eDMR reports no flow. You provided a response on January 25, 2012 indicating that you were in the process of securing a contract operator, and according to the Operator of Record (ORC) notification, a licensed operator commenced operating your plant on February 14, 2012. The log book reflects the plant being overseen by your ORC as of February 14, 2012. Monitoring data should have been collected between February 14 and February 29 and reported on the February 2012 eDMR. Part III, Item 12 requires prompt notification of noncompliance. Please provide a written explanation for the missing data.

Compliance Schedule Violations

Permit No	Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Milestone
3PR00543	11/01/2011	10/31/2016	12/01/2011	9/30/2011	01899	Construction	Advertise for Bids
3PR00543	11/01/2011	10/31/2016	12/01/2011	9/30/2011	03099	Construction	Start construction
3PR00543	11/01/2011	10/31/2016	12/07/2011	12/28/2011	----	Construction	Notify Ohio EPA
3PR00543	11/01/2011	10/31/2016	02/01/2012	12/28/2011	04599	Construction	Complete construction
3PR00543	11/01/2011	10/31/2016	12/07/2011	12/28/2011	----	Construction	Notify Ohio EPA
3PR00543	11/01/2011	10/31/2016	11/01/2012	03/30/2012	05599	Construction	Attain Oper. Level
3PR00543	11/01/2011	10/31/2016	11/01/2012	N/A	----	Construction	Submit PTI if needed

From discussions with your consultant, it appears that milestone 01899 and 03099 were completed sometime in September-October, 2011, and that milestone 04599 was completed before November 1, 2011. Ohio EA received notification that the plant was installed on December 28, 2011. While milestones were completed, some milestones were not completed by the prescribed dates. No additional information is needed to respond to these violations.

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Other Violations

1. Failure to Report Monitoring Data: Part III, Item 4 of your NPDES permit requires you to report data to Ohio EPA electronically. A review of Ohio EPA files finds no data reported for the months of December 2011, January 2012, and February 2012. Ohio EPA acknowledges that data does not exist from December 2011 through February 13, 2012; however, data collected since February 14, 2012 must be reported. This information must be submitted as soon as possible.

Comment

During the site visit, Ohio EPA noted a significant amount of debris accumulated at the final outfall and along the stream bank to the south of the outfall (glass beer bottles, old tire, and general refuse). This material must be removed as disposed of in accordance with federal and state regulations.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions 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/cs

cc: Dustin Lewis, Lewis Wastewater Management
Marlene Knopsnider

File: Semipublic/Ashtabula/Geneva Twp/Starlite Lounge (3PR00543)