



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

July 16, 2012

RE: GENEVA MOTEL  
OHIO EPA PERMIT 3PR00549  
GENEVA TOWNSHIP, ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Trupti Kapasi, Owner  
Geneva Motel  
P.O. Box 2402  
Streetsboro, OH 44241

Dear Ms. Kapasi:

On July 12, 2012, a site inspection was conducted at the above referenced facility at 3935 North Broadway, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Sandy Korn, Motel Manager, represented Geneva Motel 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. This is the first compliance inspection for this facility.

An inspection of the site indicates that the plant has not yet been constructed. The system is proposed to consist of a 2,000-gallon flow equalization tank, 1,000-gallon single compartment septic tank, a 2,000-gallon dual compartment septic tank, a 4,000-gallon dosing/recirculation tank, two 360 SF recirculating sand filters in parallel, a 1,806 SF vegetated submerged bed (constructed wetland), and an ultraviolet disinfection system, with a discharge to an unnamed tributary to Cowles Creek. The average daily design flow is 1,800 gpd. The system is proposed to serve an existing 12-unit motel with three-bedroom manager's office/apartment in Geneva Township, Ashtabula County. The system is proposed north of the current motel. No backup power is proposed to the facility and the facility will be provided with alarms.

**Observations**

The following observations were made during the inspection:

1. The plant has yet to be constructed, and a vacant mobile home occupies the area for the proposed wastewater treatment facility. Ms. Korn is unaware of any proposed construction of a wastewater treatment plant, referring any questions to Ms. Kapasi.
2. No operator of record is designated for this facility.
3. Log books and the operation and maintenance manual could not be located at the site and were not available for inspection.
4. It is unknown who will be submitting the required electronic discharge monitoring reports (eDMRs) to Ohio EPA on behalf of Sombrero Properties, LLC through Ohio EPA's Web-based application.

**NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2012 through June 1, 2012 indicates that eDMR data has not been submitted for this facility.

**Limit Violations**

No limit violations were noted for the time period reviewed.

**Reporting Violations**

No reporting code or reporting frequency violations were noted for the reporting period reviewed. Ohio EPA notes that your first eDMR report is due to be submitted by July 20, 2012 and per your NPDES permit, was to include flow readings, observations, and analytical monitoring. As the plant has not been constructed yet, the report should indicate no flow.

**Compliance Schedule Violations**

Your NPDES permit does not contain a compliance schedule.

**Other Violations**

1. **Failure to Construct a Wastewater Treatment Facility**

As you are aware, you must construct a wastewater treatment facility as soon as possible. Please provide a schedule of when the wastewater treatment facility will be constructed.

**Comments**

1. **Designate an Operator of Record**

Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. No official designation has been received by Ohio EPA Central Office. Ohio EPA's operator of record designation form may be found at:

[http://epa.ohio.gov/portals/28/documents/opcert/Operator\\_of\\_Record\\_Notification\\_Form.pdf](http://epa.ohio.gov/portals/28/documents/opcert/Operator_of_Record_Notification_Form.pdf).

Although the plant is not yet constructed, Ohio EPA recommends that you designate an Operator of Record so that they may commence operations as soon as this plant is constructed. Please complete the operator of record form and return to Ohio EPA Central Office. Please provide this office with a courtesy copy of the ORC form in replying to this letter.

2. **Facility Log Book**

Please be aware that records required pursuant to OAC 3745-7-09(A)(3) must be maintained at the facility and made available for inspection as required by rule which includes a log book, copy of the contract, and a copy of the NPDES permit. A log book must be maintained at the WWTP and available for inspection 24 hours a day. This is typically accomplished by posting a mailbox or some other weather-tight container at the WWTP. The log book must include dates, sign-in and sign-out times to demonstrate that minimum staffing requirements are being met under OAC 3745-7-04. Your facility must be staffed by a licensed operator twice weekly for a total of an hour.

3. Annual Sludge Report

Ohio EPA notes that Part II, Item I of your NPDES permit requires you to submit a report no later than January 31<sup>st</sup> summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year.

4. Outfall Signage

Ohio EPA notes that Part II, Item J of your NPDES permit requires you to post a sign at your outfall along the unnamed tributary to Cowles Creek. This sign must be posted by September 1, 2012.

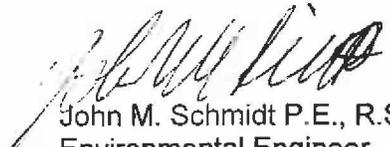
5. Monitoring Data Reporting

Part III, Item 4 of your NPDES permit requires you to report data to Ohio EPA electronically. Data is due by the 20<sup>th</sup> of the month for the preceding month (i.e the June 2012 eDMR is due to Ohio EPA no later than July 20, 2012). Instructions for establishing an eDMR account to submit data may be found under Part II, Item 4 of your NPDEs permit on page 12.

***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: Martha Horvitz, Ohio EPA, Legal, CO  
Rachel DeMuth, Ohio EPA, DSW, CO  
Casey Chapman, AGO-EES  
Christine Rideout, AGO-EES

File: Semipublic/Ashtabula/Geneva Twp/Geneva Motel (3PR00549)