



**Environmental
Protection Agency**

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

September 10, 2012

RE: TRUMBULL COUNTY
BAZETTA TOWNSHIP
LTC SUPPLY CORPORATION
2472 NILES-CORTLAND RD AND
2332 CADWALLADER-SONK RD
NPDES PERMIT NO. OH0139327
OHIO EPA PERMIT NO. 3PR00440

The LTC Companies
Attn: Jim Renacci
P.O. Box 240
Wadsworth, Ohio 44282

CERTIFIED MAIL

Mr. Renacci:

Ohio EPA and the Trumbull County Health Department performed an inspection of the wastewater treatment works serving the above-referenced facility on August 20, 2012. The inspection was performed to evaluate the operation and maintenance of the treatment system, and determine the facility's overall compliance status with its National Pollutant Discharge Elimination System (NPDES) permit.

The newly-constructed wastewater treatment system was installed to service two buildings contained on a single parcel. The treatment system consists of a 1,000-gallon trash trap for the office building, an existing septic tank of unknown capacity for the home, a prefabricated 750-gpd EnviroGuard aerobic treatment unit, a 500-gallon dosing chamber, dual-unit surface sand filters, and ultraviolet effluent disinfection. The EnviroGuard unit itself consists of an integral 490-gallon trash trap and a 525-gallon dose tank. Treated effluent is discharged to the Big Run tributary of Mosquito Creek.

During the inspection, the following observations and/or deficiencies were noted:

1. Construction of the wastewater treatment system had recently been completed.
2. It appears that during construction, a number of changes were made to the approved design without prior authorization from Ohio EPA. Please refer to the attached list of construction inspection comments issued by the Trumbull County Health Department on August 15, 2012. Each of the inspection comments must be addressed. Please note that unauthorized construction changes may require an application for an As-Built PTI.
3. Sediment was observed in the sample well.
4. The effluent appeared to be clear, and was not causing any immediately noticeable, adverse impacts to the receiving stream.
5. Please keep a bound and numbered logbook at the facility to record all operation and maintenance work performed at the treatment plant. Logbooks shall contain, at a minimum, the date, arrival and departure time of operation and maintenance personnel, a description of the work performed, and initials of the person performing the work.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) indicated that there has been no reporting data submitted on behalf of the facility since the permit went effective in March 2007. Further review also indicated that the LTC Supply Corporation has not: 1) Set up an online eBusiness account to submit the required reporting data electronically, or 2) applied for a Personal Identification Number to electronically sign and certify reporting data. Failure to submit required reporting data is a violation of the terms and conditions of the NPDES permit.

Part I, C of the NPDES permit contains a compliance schedule that required a new wastewater treatment system be installed in accordance with PTI No. 557201, and made operational by no later than six months from the effective date of the NPDES permit. The necessary wastewater treatment system upgrades were not made until August 2012, and were constructed in accordance with a new PTI. PTI No. 818707 was necessary because PTI No. 557201 had expired. Failure to meet the requirements of a compliance schedule is a violation of the terms and conditions of the NPDES permit.

In addition to the items identified above, please be aware that NPDES renewal applications are required to be submitted at least 180 days in advance of the expiration date of the current permit, which in this case was February 29, 2012. The paperwork for NPDES renewal applications is mailed out by Ohio EPA's central office well in advance of the existing permit's expiration date. Discharging treated or partially treated wastewater to waters of the state without a valid NPDES permit is a violation of Ohio Revised Code 6111 and Ohio Administrative Code 3745. To date, this office has not yet received an NPDES renewal application.

Please complete and submit the enclosed NPDES application forms. The LTC Supply Corporation must also submit with the application a \$200 application fee in the form of a check made payable to "Treasurer – State of Ohio." Please note that once a new NPDES permit is issued, it will contain, among other things, numeric effluent limits, operator requirements, and outfall signage requirements.

Part II, A of the existing NPDES permit requires that a renewable contract be maintained with a certified wastewater operator. This office has no documentation on file demonstrating that this requirement has been satisfied. The new NPDES permit will also contain specific language requiring that the LTC Supply Corporation contract with a certified wastewater operator to oversee regular operation and maintenance of the facility.

Pursuant to Ohio Administrative Code 3745-7-04, the facility will be classified as a Class A treatment works. Operators must be present at Class A treatment works twice a week for a minimum of one hour total. Once the LTC Supply Corporation obtains coverage under the new NPDES permit, it must designate an operator on the enclosed Operator of Record Notification (ORC) form.

In addition to the operator requirements, the LTC Supply Corporation will also be required to install an outfall marker at the discharge location. Part II of the new permit will contain language describing the outfall marker requirements.

Based on the findings of the inspection and the reporting data review, the LTC Supply Corporation is considered to be in **significant non-compliance** with the terms and conditions of the NPDES permit. This matter will be referred to our legal section for appropriate enforcement action.

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that will be taken, or have been taken, to address the above-referenced violations and/or deficiencies. The response shall include specific dates for the initiation and completion of this action plan.

Should there be any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry, P.E.,
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: ORC form
NPDES application forms
Trumbull County Health Department construction inspection letter

cc: Steve Kramer, R.S., Trumbull County Health Department
Frank Migliozi, R.S., Trumbull County Health Department

ec: Dean Stoll, P.E., Ohio EPA, DSW, NEDO

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PS Form 3800, August 2006	
See Reverse for Instructions	



JAMES J. ENYEART, M.D.
Trumbull County Health Commissioner
TRUMBULL COUNTY HEALTH DEPARTMENT
176 Chestnut N.E. • Warren, Ohio 44483
www.tcbh.org

RECEIVED

AUG 17 2012

OHIO DEPARTMENT OF HEALTH

August 15, 2012

Tomas Parry
OEPA/NEDO
2110 East Aurora Rd.
Twinsburg, OH 44087

Re: The LTC Companies, 2472 Niles Cortland Rd., Bazetta Twp.

Dear Mr. Parry:

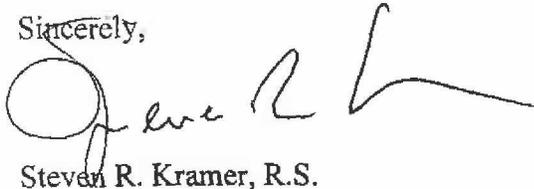
This letter is in regard to noted items at the above reference property which were achieved during more recent installation inspections. All information is regarding Application No. 818707.

- Influent piping from #2332 structure to 1000 gallon trash trap is 4" diameter as is effluent piping. This increases to the 6" diameter lateral.
- At the Enviroguard trash trap, the lateral is reduced from 6" to 4". The pvc outlet tee is 4" and the required 30-50 percent of tank depth extension of this T was not verified.
- The orientation of the following components varies from the design: 1) Enviroguard system – trash trap and dosing tank are orientated north/south on their centerline, the 750 gpd treatment tank and lift tank are adjacent and west of these. 2) The distribution lateral for the sand filters is north of them, adjacent to the driveway (possibly at risk of damage) and the uv sterilizer/sample well is east of the filter.
- The structural integrity of the (believed to have been a McGill design ATU) tank at the #2472 structure was not demonstrated. The effluent outlet was compromised. Photos taken to document. Re-establishment of the outlet is depicted. Copies of photos enclosed.
- A 4" clean out was installed adjacent to this location.
- The joint at the uv unit to the lateral was made utilizing a cement product. Per Trumbull County Health Department plumbing inspector Bob O'Connell, the state of Ohio plumbing code does not approve this. Two dissimilar materials are being joined.
- The joint at the clay discharge lateral to the State Route 46 catch basin was sealed with tar.
- The #2472 structure's wall mounted electrical control indicates model # FTB0.5, 500 gpd capacity.

- The nomenclature at the 750 gpd treatment tank reads model # FTB0.75.
- Grading had been completed but seeding was not evident.

If you have any questions, please call me at (330) 675-7813 Monday through Friday between 2:30 p.m. and 4:00 p.m. If any as-built revisions were made, please forward to the Trumbull County Health Department for record update when/if available.

Sincerely,

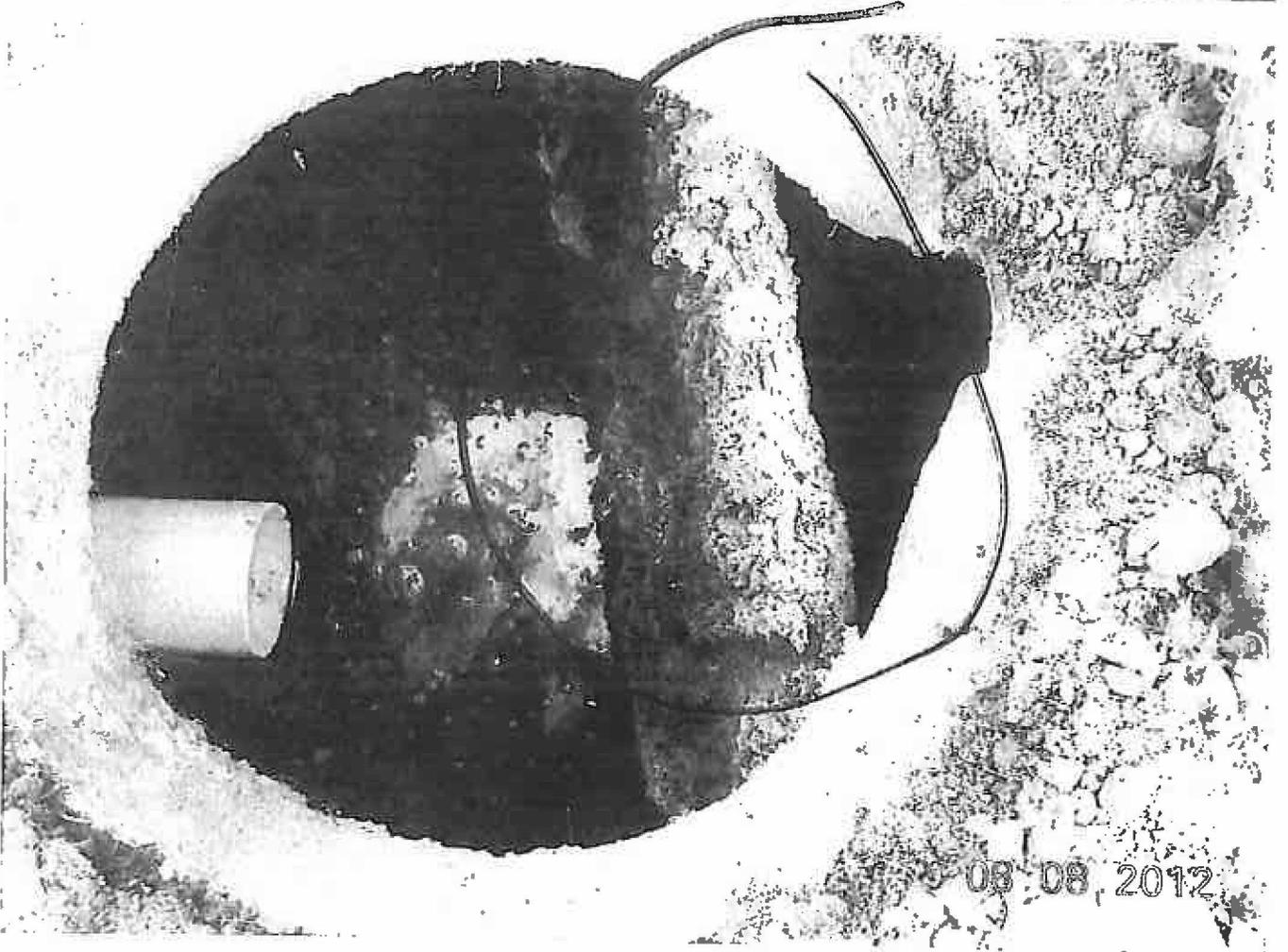
A handwritten signature in black ink, appearing to read "Steven R. Kramer". The signature is fluid and cursive, with a large initial "S" and "K".

Steven R. Kramer, R.S.
Public Health Sanitarian
Trumbull County Health Department

Cc: William R. Makosky P.E., Lynn, Kittinger & Noble, Inc., Consulting Engineers



08/08/2012



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