



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

March 8, 2013

RE: TRUMBULL COUNTY  
BRISTOLVILLE  
6233 SR 45  
BRISTOL INN  
NPDES PERMIT NO. OH0144495  
OHIO EPA PERMIT NO. 3PR00559

Wes Mahan  
5183 Old Lake Rd.  
Geneva, OH 44041

Mr. Mahan:

On May 7, 2012, this office responded to a complaint against the property alleging that raw sewage was being discharged onto the ground surface behind the facility. The inspection performed on May 7, 2012, confirmed the allegations. As a result, you were called into Ohio EPA's Northeast District Office for a meeting to discuss what needed to be done to address this illicit discharge.

One of the immediate, temporary remedies was to have you reconnect the building's sanitary effluent pipe to some existing septic tanks (later determined by Trumbull County Board of Health dye test to be discharging to a nearby drainage ditch) to capture solids, floatables, etc. You also applied for an individual National Pollutant Discharge Elimination (NPDES) permit to authorize the discharge. Your application was approved, and your NPDES permit became effective on September 1, 2012.

Most recently, Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on February 28, 2013. The inspection was performed to evaluate the overall operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of the NPDES permit.

Please note that the NPDES permit contains a compliance schedule with multiple milestone dates for upgrading the facility's treatment works to current standards. The compliance schedule milestones include:

1. *Submit detail plans for plant improvements as soon as possible, but not later than 6 months from the effective date of this permit (Event Code 01299). – **Missed***
2. *Advertise for construction bids, receive bids, and award contracts as soon as possible, but not later than 9 months from the effective date of this permit. (Event Code 01899). – **Not Achieved Yet***

3. *Commence construction as soon as possible, but not later than 12 months from the effective date of this permit (Event Code 03099). - **Not Achieved Yet***
4. *Notify the appropriate Ohio EPA District Office within seven days of construction initiation. - **Not Achieved Yet***
5. *Complete construction as soon as possible, but not later than 15 months from the effective date of this permit (Event Code 04599). - **Not Achieved Yet***
6. *Notify the appropriate Ohio EPA District Office within seven days of construction completion. - **Not Achieved Yet***
7. *Attain operational level of the treatment works and meet final effluent limitations as soon as possible, but not later than 18 months from the effective date of this permit (Event Code 56599). - **Not Achieved Yet***
8. *Notify the appropriate Ohio EPA District Office within seven days of attaining operational level. - **Not Achieved Yet***

Please note that you have already failed to meet the requirements of milestone 1 in the compliance schedule. Failure to comply with the requirements of an NPDES compliance schedule is a violation of the terms and conditions of the NPDES permit.

In addition to missing compliance schedule milestone 1, a review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) for the period September 2012 – January 2013 indicated that you have failed to submit any of the required reporting data since the NPDES permit became effective. Ohio EPA has mailed out multiple notices in the past advising you of the need to submit the required monitoring and effluent sampling data. Failure to submit reporting data as required by the NPDES permit is a violation of the terms and conditions of the NPDES permit.

To submit the required monitoring and sampling data, you must set up an eBusiness account on Ohio EPA's website. Please visit the provided weblink to set up your eBusiness account. For specific questions regarding setting up your account or submitting reporting data, please contact James Roberts at 614-644-2054.

<https://ebiz.epa.ohio.gov/>

Due to the missed deadline date of compliance schedule milestone 1, and the failure to submit the required eDMRs, Bristol Inn is considered to be in **significant noncompliance** with the terms and conditions of the NPDES permit. As such, you must immediately devise, and then execute, a corrective plan of action to address these items. Your corrective plan of action must include the immediate submittal of a Permit to Install (PTI) application.

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Please consult with a registered, professional engineer to design an appropriate, upgraded wastewater treatment system. The engineer will need to submit their design to Ohio EPA for review and approval in the form of a PTI application package. Please note that a PTI is necessary before any type of upgrades to the treatment works can be made.

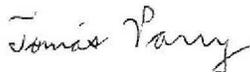
Part II, J of the NPDES permit also requires that an outfall marker be erected no later than 4 months from the effective date of the permit. During the inspection, no such outfall marker was observed. Please refer to the above-referenced section of the NPDES permit for specific instructions regarding the sizing, positioning, and what information must be displayed on the marker.

Please note that failure to comply with the terms and conditions of the NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that have been taken, or will be taken, to address the items described in this letter. Your response shall include specific dates for the initiation and completion of this action plan.

Should you have any questions or concerns regarding this letter, please contact this office at 330-963-1120.

Respectfully,



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

TP:bo

pc: Steve Kramer, R.S., Trumbull County Health Department