



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

May 17, 2013

RE: EASTON SERVICE - CULLIGAN WATER
OHIO EPA NPDES PERMIT 3IE00032
COLEBROOK TWP., ASHTABULA CO.
COMPLIANCE EVALUATION INSPECTION

Mr. Leland Easton, Secretary
Easton Service Inc.
DBA Culligan Water Conditioning
1427 U.S. Route 322 East
Orwell, OH 44076-9368

Dear Mr. Easton:

On May 16, 2013, a site inspection was conducted at the above referenced facility at 1427 U.S. Route 322 East, Colebrook Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you represented Easton Service Inc. 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 April 11, 2012.

Your facility has two onsite wastewater treatment systems. One system accepts sanitary wastes from the office building and restroom in the shop, and consists of a 750-gallon septic tank and a 1,000-gallon septic tank in series, existing leach bed, dosing tank, and an evapo-transpiration field with a curtain drain. There is no discharge from this system evident from the inspection. The industrial wastewater treatment system consists of the backwash brine from softening water deionizing water, and green sand filters, and consists of five tanks in series each 4,000 to 5,000 gallons in capacity. There is no aeration and the system relies solely upon mechanical settling. The industrial wastewater flows through piping where it joins dilution water pumped from a nearby pond and groundwater from field tiles on the property in a manhole, and is discharged to an unnamed tributary of Mosquito Creek.

Observations

The following observations were made during the inspection:

1. The design flow of the industrial wastewater treatment system is 12,000 gpd for tank backwash and 5,000 gpd for regeneration. The plant was operating at the time of the inspection, with wastewater is processed in batches.
2. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.
3. The overall condition of the treatment plant during this inspection was satisfactory.

4. Samples are collected by Microbac Laboratories of Erie, PA. Microbac personnel perform on-site analysis of pH and specific conductivity. Easton submits report data on the electronic discharge monitoring reports (eDMRs) on your behalf for this facility.
5. A manhole located northeast of the office building combines the flows from the industrial wastewater effluent, ground water intercepted by field tiles installed in the 1950s, and a parking area catch basin. The industrial plant effluent has an outfall in the manhole that can be sampled separately prior to combining with storm water and ground water.
6. The industrial final effluent in the manhole located northeast of the office building could be observed as a small trickle, but was observed in acceptable visual quality. The final effluent was clear as observed in a manhole between the plant and the final outfall. The final discharge at the stream bank could not be observed as it was partially submerged by the tributary to Mosquito Creek.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2012 through May 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violation was noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	70300	Residue, Total Filterable	30D Conc	1500	1775.	12/1/2012
001	70300	Residue, Total Filterable	30D Qty	68.0	80.6205	12/1/2012
001	00940	Chloride, Total	1D Conc	0.019	2.	2/20/2013
001	00940	Chloride, Total	1D Qty	0.0008	.09084	2/20/2013

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of the violations, along with measures taken to ensure that they are not repeated. Easton Service provided an explanation for the December 2012 violations on January 14, 2013. No additional information is needed to respond to the December 2012 violations. Ohio EPA did not receive an explanation for the February 2013 violations. A fact sheet on this requirement may be found online at:

http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf.

Noncompliance Notification forms may be found online at:

<http://epa.ohio.gov/dsw/permits/individuals.aspx>.

Ohio EPA must receive notification for the February 2013 violations, along with measures to ensure that they are not repeated.

Reporting Violations

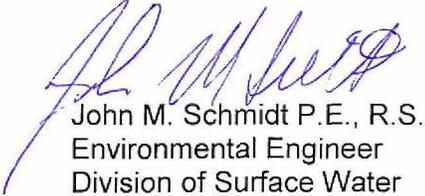
No reporting frequency violations or reporting code violations were noted for the period reviewed.

Compliance Schedule

Ohio EPA notes that milestones listed in your compliance schedule have been completed.

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

File/Industrial/Easton Service Inc. (Colebrook Twp.)/PC