



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

August 5, 2013

RE: HARTSGROVE BP CONVENIENCE STORE
AND CIRCLE CREEK RESTAURANT
NPDES PERMIT NO. 3PR00214
HARTSGROVE TWP., ASHTABULA CO.
COMPREHENSIVE EVALUATION INSPECTION

Mr. David Nye, Owner
Hartsgrove BP Convenience Store
5599 Hambden-Andover Road (U.S. Route 6)
Rome, OH 44085

Dear Mr. Nye:

On August 1, 2013, a site inspection was conducted at the above referenced facility at 5599 Hambden-Andover Road (U.S. Route 6), Hartsgrove Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, with Mr. Ritch Nasca and James Hall representing Hartsgrove BP and Circle Creek Restaurant. 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 August 7, 2012.

Observations and Notations

Following are observations and notations made during the inspection:

1. The majority of the flow to this wastewater treatment facility originates from the Circle Creek Restaurant prior to December 24, 2012. The restaurant has been closed since. Currently, there is a single restroom in the BP station that flows to the wastewater treatment plant.
2. The plant is operated by Mr. Nasca, Mr. James Berkey, and Mr. David Nye. Mr. Nasca and Mr. Berkey typically perform routine onsite analyses of pH, dissolved oxygen, temperature, and conductivity and submit this data to the electronic discharge monitoring system (eDMR). Microbac Laboratories performs the remaining off-site analysis and submits the eDMR data to the on behalf of Hartsgrove BP Convenience Store.
3. Log books and the operation and maintenance manual are maintained at the site. A copy of the NPDES permit and contract with your operator could not be located. A copy of the permit, contract, and operation and maintenance manual must be kept in the same location as the log book, and the log book must be in bound format with numbered pages. All data not represented by laboratory bench sheets must be in the log. The information was found compliant with Ohio Administrative Code (OAC) 3745-7-09. The plant is currently seen twice weekly by the Ohio Revised Code (ORC).
4. The influent pump station and equalization basin pumps and associated alarms could not be cycled due to a lack of power to the control panel. Therefore, their operating condition is unknown. Discussions with Mr. Nasca indicated that the panel operates on a timer attached

to the fuse box. Follow-up discussions with you indicated that the power was temporarily disabled to the control panel due to work on a soft-serve machine inside the BP station. As the control panel contains high level alarms, any time must be attached at the control panel to ensure that the high level alarms are operational at all times.

5. Due to a lack of power, the aeration tank was acting as a pass-through device. Due to a lack of power at the control panel, the aeration blowers could not be cycled and their operating condition is unknown.
6. The clarifier functions as a flow through unit tributary to the biological filter. The tank appeared in acceptable condition. The return sludge line was found in operable condition.
7. The dosing pumps were cycled and found in operating condition along with the associated alarms.
8. The 5,000-gpd titan membrane biological filter was examined and found in operating condition.
9. The plant microfiltration system does not require disinfection to meet its NPDES effluent requirements. The existing chorine contact tank is used as a chlorine backwash tank for the membrane filter.
10. The final effluent discharge to the unnamed tributary to Hoskins Creek north of the wastewater plant was observed to be of acceptable visual quality.

NPDES Permit Compliance Review

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

Limit Violations

No limit violations are noted for the time period reviewed.

Reporting Violations

No reporting limit or reporting code violations are noted for the time period reviewed.

Compliance Schedule:

No compliance schedule violations are noted for the time period reviewed; milestones have been completed.

Other Violations:

Information to Maintain at the WWTP: OAC 3745-7-09 requires you to maintain a copy of the NPDES permit and a copy of the contract with your operator of record at the wastewater treatment facility. Please ensure that this information is available at the wastewater treatment facility and available for future inspections. The log book required by OAC 3745-7-09 was individual pages stapled together. This information must be maintained in a bound log book with sequentially numbered pages. The loose leaf sheets may be tape bound and sequentially numbered at any office supply store to meet this requirement.

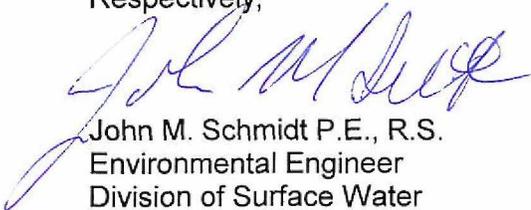
Failure to Maintain WWTP: During the inspection, the power was not available to the control panel that controls the flow equalization high level alarms, pumps, and aeration tank blowers. The explanation offered was that this equipment is redundant with the microfiltration system and operates on a timer at the control panel. Until Ohio EPA approves a permit-to-install, these components must remain in operation. The control panel must be rewired to ensure that the control panel functions at all times, and if a timer is desired the timer must be wired at the control panel.

Comments

1. During the inspection, conversations with your operator indicated that the plant microfiltration system does not function as well with the extended aeration plant in operation, and that these structures should be removed. As long as the restaurant is attached to this treatment system, the flow equalization tank will need to remain a part of this treatment system. If you desire to remove the extended aeration tank and clarifiers as treatment units by either removing the tanks or piping through them, Ohio EPA will need to review the proposed changes as a part of a permit-to-install.
2. According to the Operator of Record notification, Jim Berkey is listed as the sole operator of this facility. If the primary operator is primarily Mr. Nasca, then Ohio EPA will need to be notified through the Operator of Record notification form. Ohio EPA acknowledges that Mr. Nye has submitted an Operator of Record notification form to add himself as a licensed operator. The notification form should be amended to add Mr. Nasca if he serves as the primary operator of the facility.

If you have any questions or comments regarding this notification, 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/SP/Ashtabula Co./Hartsgrove Twp/Hartsgrove BP Convenience Store (3PR00214)