



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

July 30, 2013

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 29, 2013, 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. Prior to the inspection, I spoke briefly with Sandy Korn, Motel Manager, who represented Geneva Motel. Nobody represented either Geneva Motel or Northridge Music Center 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 comprehensive compliance inspection for this facility was completed on July 12, 2013.

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.

Currently, the motel discharges to an existing wastewater treatment system owned by Northridge Music Center (NMC), located northeast of the motel building and north of a vacant mobile home. The existing system is located on the Northridge Music Center property. No discharges were noted from the tank or dry well opening on the NMC property.

Observations

The following observations were made during the inspection:

1. The plant has yet to be constructed, and a vacant mobile home continues to occupy the area for the proposed wastewater treatment facility. Ms. Korn is unaware of any proposed construction schedule for the wastewater treatment plant (WWTP), referring any questions to Ms. Kapasi.

2. Dustin Lewis of Lewis Wastewater Services became the designated Operator of Record (ORC) on September 12, 2012. The plant will be operated by Mr. Lewis on behalf of Geneva Motel. It is unknown who will operate the plant on days when the plant is not seen by Lewis Wastewater Services.
3. Log books and the operation and maintenance manual could not be located at the site and were not available for inspection. A log book will be maintained once the plant is constructed and the plant commences operation.
4. No construction schedule has been provided by Geneva Motel of when construction will commence on the WWTP; therefore, it is unknown when construction will commence or when construction will be completed and compliance final effluent limits will be achieved. As noted in Casey Chapman's July 23, 2013 letter, construction must commence as soon as possible in order to have a system that is fully operational by the end of the year.
5. Onsite samples are envisioned to be collected and analyzed by the Lewis Wastewater Services. Laboratory analysis will also be performed by Lewis Wastewater Services. Data is reported by the Lewis Wastewater Services on behalf of Geneva Motel on the electronic discharge monitoring reports (eDMRs).

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2012 through July 1, 2013 indicates eDMRs reflect that no flow has been reported to Ohio EPA as expected.

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.

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.
2. **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. Per your permit requirements, signage should have been posted no later than September 1, 2012.

Comment

1. **Facility Log Book**
Once the plant is constructed, 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. Once the plant commences operation, your facility must be staffed by a licensed operator twice weekly for a total of an hour.

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)