



Environmental  
Protection Agency

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

September 30, 2011

E.C. Babbert, Owner  
7415 Diley Road  
Canal Winchester, OH 43110

**Re: E. C. Babbert WWTP  
NPDES Permit 4IM00104/ OH0136531  
Reconnaissance Inspection  
Fairfield County**

Dear Mr. Babbert:

On August 30, 2011, a Reconnaissance Inspection was conducted at the WWTP located on your property. Present for the inspection were Mike Jeffers, the operator of the plant, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

**Findings:**

1. Attached are effluent violations between October 2009 and August 2011. There are a few discrepancies with the manner that the eDMRs have been submitted.
  - a. When reporting parameters on days which the plant is not normally staffed such as weekends or holidays, **the code AN should be used instead of a numerical value.**
  - b. The eDMR of May 2011 had reporting errors relating to chlorine residual, fecal coliform, and total dissolved oxygen. The chlorine results (see Finding 2 for more about this parameter) were transcribed from the flow rates resulting in violations; the fecal coliform results were transcribed from either color, turbidity, or odor, and should have only two results listed. The total dissolved oxygen does not include the results of one analysis. **The eDMR should be resubmitted for these parameters for May 2011.**
  - c. This office does not have reports from June 2010, September 2010, and June 2011 on record. **The eDMRs must be submitted for these months.**

2. The facility installed an ultraviolet disinfection system in lieu of installing a dechlorination system. The current permit requires analyzing total residual chlorine monthly which is no longer necessary. **I recommend using the code AH for chlorine until the permit is renewed in October 2012.** The AH code should always be used with an explanation, in this case you should state that UV disinfection is installed and that chlorine is no longer used.

The tablet-fed chlorination unit is still located on-site as a backup to the UV system in the event of failure. Ohio EPA understands the benefits of the redundant system but in this case, the chlorination unit should not be used because of the lack of dechlorination system. **The chlorination system should be removed by expiration of the permit which is September 30, 2012.**

3. There is room for improvement with records retention. The NPDES permit requires retention of records of between three to five years. The operator primarily manages older records through e-mails and has the ability to request lab results from MASI. I recommend creating a folder on the computer or a hardcopy of the reports specifically regarding the NPDES permit. **Please note that the next inspection will include a more rigorous assessment of records.**
4. The plant appeared to be operating properly and the effluent looked clear and was free of solids and odor. Also, the facility has properly installed a sign at the outfall as required by the permit.

Attached is the Reconnaissance Inspection Report which includes no additional items which require comment. **I request a notification by October 28 regarding the submittal of the eDMRs.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,



Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

ec: Cole Miller

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IM00104	OH0136531	RI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
8/30/2011	10:00 AM	10:45 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
E C Babbert 7415 Diley Road Canal Winchester, OH 43110	10/1/2007
	Permit Expiration Date
	9/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Mike Jeffers, Operator	(614) 837-4539
Name and Title of Responsible Official	Phone Number
E.C. Babbert, Owner	(614) 837-8444

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	Room for improvement with records and reporting,
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	The dosing station pump is used to determine flow.
S	Receiving Waters	
N	Laboratory	

Comments:

The facility has greatly improved compliance with the effluent permit limits but could improve the compliance with the reporting aspects of the NPDES permit. Most importantly, the missing months of DMRs must be submitted as soon as possible.

Signatures			
	8/31/11		9/2/11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

## Compliance Data for E C Babbert between 10/1/2009 to 8/1/2011

### Summary

Permit Effluent Limit Violations: 48

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: \* 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2009	001	Chlorine, Total Residu	1D Conc	0.019	1.	10/12/2009
May 2010	001	Chlorine, Total Residu	1D Conc	0.019	.18	5/14/2010
May 2010	001	Dissolved Oxygen	1D Conc	6.0	5.2	5/14/2010
July 2010	001	Chlorine, Total Residu	1D Conc	0.019	2.2	7/15/2010
July 2010	001	Dissolved Oxygen	1D Conc	6.0	5.1	7/16/2010
August 2010	001	Chlorine, Total Residu	1D Conc	0.019	4.3	8/16/2010
October 2010	001	Fecal Coliform	30D Conc	1000	6000.	10/1/2010
October 2010	001	Fecal Coliform	1D Conc	2000	6000.	10/5/2010
November 2010	001	CBOD 5 day	30D Conc	10	50.	11/1/2010
November 2010	001	CBOD 5 day	30D Qty	0.08	.14194	11/1/2010
November 2010	001	CBOD 5 day	1D Conc	15	50.	11/5/2010
November 2010	001	CBOD 5 day	1D Qty	0.11	.14194	11/5/2010
January 2011	001	Dissolved Oxygen	1D Conc	6.0	5.4	1/21/2011
March 2011	001	Total Suspended Solids	30D Conc	12	13.	3/1/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/1/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	750.	5/2/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	700.	5/3/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	740.	5/4/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	630.	5/5/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	680.	5/6/2011

May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/7/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/8/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	710.	5/9/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	720.	5/10/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	830.	5/11/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	600.	5/12/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	640.	5/13/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/14/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/15/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	630.	5/16/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	690.	5/17/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	730.	5/18/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	650.	5/19/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	720.	5/20/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/21/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/22/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	700.	5/23/2011
May 2011	001	Dissolved Oxygen	1D Conc	6.0	4.8	5/23/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	630.	5/24/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	770.	5/25/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	620.	5/26/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	660.	5/27/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/28/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	1.	5/29/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	610.	5/30/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	720.	5/31/2011
July 2011	001	Fecal Coliform	30D Conc	1000	5300.	7/1/2011
July 2011	001	Fecal Coliform	1D Conc	2000	5300.	7/19/2011

\*The facility has 3 missing data reports.

Station	Required Report Period	DMR Received
001	June 2010	No
001	September 2010	No
001	June 2011	No