



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PA0002320080828

GREENE

CLIFTON WWTP

ZIMMERMAN, MICH 2008/08/28



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

August 28, 2008

Mr. Ronald Volkerding
Greene County Sanitary Engineering Department
667 Dayton-Xenia Road
Xenia, Ohio 45385

**Re: Greene County Clifton WWTP
NPDES Permit No. 1PA00023*BD; OH0118567
NPDES Compliance Inspection and Notice of Violation**

Dear Mr. Volkerding:

On July 24, 2008, Laura Pohlman and I conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection at the above referenced facility. Barry Stroop, Operations Supervisor, and Eric Wilson, Class III Operator, were present and represented the County during the inspection. The purpose of this annual inspection was to evaluate several aspects of plant operation and performance, and to assess compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit.

Observations and findings of the inspection are included in the attached report. As indicated in the report, all areas evaluated during the inspection were rated satisfactory. Generally, the County has been operating the Clifton plant in compliance with the terms and conditions of the NPDES permit. However, our review of the monthly electronic Discharge Monitoring Reports for the period July, 2006 through July, 2008 revealed two final effluent limit violations for NH₃-N (7-Day conc. and loading exceedances) occurring in August, 2007. We have no record of these violations being reported to the Ohio EPA. Please provide this office a written response by September 29, 2008 indicating the cause of the violations and the steps you intend to take to reduce and/or eliminate these violations. Finally, a copy of the operator's certificate must be displayed for public examination in the office/laboratory at the plant (per OAC 3745-7-05-C).

If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,

Michael W. Zimmerman
Division of Surface Water

Copy: Barry Stroop / Eric Wilson, Greene County Sanitary Engineering Department





State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PA00023*BD	OH0118567	07/24/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Greene County Clifton WWTP 3865 S.R. 72 North Cedarville, Ohio Mailing: Greene Co. SED; 667 Dayton-Xenia Rd 45385	2:25 pm	3/1/2002
	Exit Time	Permit Expiration Date
	3:05 pm	2/28/2007
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Barry Stroop, Operations Supervisor Eric Wilson, Class III Operator	(937) 562-7171 or cell (937) 603-5561 (937) 766-4794 or cell (937) 603-5577	
Name, Address and Title of Responsible Official	Phone Number	
Ronald Volkerding, PE, Deputy Director	(937) 562-7414	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Refer to attached report.	
Inspector	Reviewer
 Michael W. Zimmerman Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
8-26-08 Date	8/27/08 Date

Permit # : 1PA00023*BD
NPDES #: OH0118567

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... N/A
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Permit Verification

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Review of eDMRs from July 1, 2006 through July 31, 2008: two final effluent limit violations at Outfall 001 for NH3-N:

- 7-Day concentration in August, 2007- 3.54 mg/l reported; permit limit is 1.5 mg/l
- 7-Day loading in August, 2007 – 0.28 kg/day reported; permit limit is 0.16

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site..... N
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

<i>Three-ring binder kept in the lab. Operator certification not displayed.</i>
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- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... Y
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

Treatment Works:

- two hopper clarifier; clear effluent
- slow sand filters cleaned recently, only one being used at the time
- new flow meter recently installed
- tablet chlorination and dechlor.

Collection System:

- Marcus Lehotay, collection system supervisor (937) 562-7111

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: 9/18/2002 Approval #: 05-420-PW Not submitted N/A
- (b) Sludge management plan current..... N
(c) Sludge adequately disposed..... Y
(Method: landfill)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... Y
(Name: Hiney Trucking)
(f) Has amount of sludge generated changed significantly since
last inspection..... N
(g) Adequate sludge storage provided at plant..... Y
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... Y
(j) Any complaints received in last year regarding sludge..... N
(k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Sludge is wasted/pumped once a month and hauled to and dewatered at the Greene Co. Beavercreek WRRF. Greene County contracts with Hiney Trucking to transport the dewatered sludge to the Cherokee Run landfill for final disposal. The sludge management plan needs to be updated to reflect current sludge disposal practices.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
(b) Calibration frequency adequate Y
(Date of last calibration: April, 2008)
(c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Flow meter is calibrated once/year.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
 - (c) Analyses being performed more frequently than required by permit. N
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... N
- Parameters analyzed by commercial lab: *None*

Lab name:

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
 - (g) Satisfactory calibration and maintenance of instruments/equipment. Y
 - (h) Adequate records maintained..... Y
 - (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
- Date: *N/A*

Comments/Status:

Temperature of final effluent automatic sampler was zero degrees Celsius.

All parameters except field measurements are analyzed by the Greene County Regional Laboratory.

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	Clear	None	None	Clear	---

Comments/Status:

Final effluent flows through a 4-inch pipe which runs north from the plant, discharges to the roadside drainage ditch on west side of SR 72, which then travels approx. 100 ft. before it flows into the Little Miami River.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

