



Environmental
Protection Agency

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

August 29, 2011

Gene Choquette
Chevron Environmental Management Company
4800 Fournace Place E520E
Bellaire, Texas 77401

RE: Chevron Cincinnati Facility
NPDES Permit 11G00000*FD
Compliance Evaluation Inspection

Dear Mr. Choquette:

On August 1, 2011, I conducted an NPDES compliance evaluation inspection at the Chevron Cincinnati Facility. A copy of my inspection report is attached for you to review. All areas evaluated received a satisfactory rating. No response to this inspection is necessary. If you have any questions, please call me at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

Enclosure

cc: Matt Mitchell, TriHydro Corp.





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
1IG00000*FD	OH0009326	8/1/2011	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Chevron Cincinnati Facility 5000 State Route 128 Cleves, Ohio	9:30 am	11/1/2007
	Exit Time	Permit Expiration Date
	11:30 am	12/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Dale Barrett, John Hall, Matt Mitchell - TriHydro Corp.	513-353-1323 x 23	
Name, Address and Title of Responsible Official	Phone Number	
Gene Choquette Chevron Environmental Management Company 4800 Fournace Place E520E Bellaire, Texas 77401	713-432-2631	

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	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	S	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>During Compliance review period Sept. 2010 – July 2011, there was 1 effluent limit violation on 12/16/2010 for Oil & Grease daily max loading limit. A follow up non-compliance notification letter was received by Ohio EPA on 1/19/2011.</p> <p>Chevron has addressed the General Lab Criteria comments from the previous compliance inspection.</p> <p>During the high grade pumping season, August thru February, Chevron's discharge is approx. 3.6 MGD.</p>	
Inspector	Reviewer
 Mary Osika Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
8/29/2011 Date	8/29/11 Date

Permit # : 1IG00000*FD
NPDES #: OH0009326

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) Do Categorical Standards apply?...If yes, list applicable standards.. N
- (d) Product(s) and production rates conform with permit application (Industries)..... Y
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... Y
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

A permit renewal application was received by Ohio EPA on 6/22/2011. Renewal of this permit is scheduled for the end of the year 2011.

Section F: Compliance

- (a) Any permit violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/E

Comments/Status:

See summary section at front of report.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator or dual feed N

i. What does the back-up power source operate.....

ii. How often is the generator tested under load.....

(b) Which components have an alarm system available for power or equipment failures.....

Alarm for power failure & treatment system level failures.
Automation of treatment system via PLC.

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

(e) Any major equipment breakdown since last inspection..... N

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:

Section H: Sludge Management

(a) Method of Sludge Disposal...

- Land Application
- Haul to Another NPDES Permittee
- Haul to a Mixed Solid Waste Landfill
- Not Applicable (no sewage plant)

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained..... Y
Type of device (e.g. weir with ultrasonic level sensor):

Parshall flume with ultrasonic level sensor and staff gage
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- (b) Calibration frequency adequate Y
(Date of last calibration: visual, weekly)
- (c) 24-hour recording 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:

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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..... N/E
(see GLC page)
- (d) 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

Comments/Status:

Contract Lab, Test America, performs all compliance sampling for NPDES permit. Dale Barrett gave email correspondence to me during inspection discussing the QA/QC check with Their contract lab.
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Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N/E
- (b) Do SOP's include the following if applicable..... N/E
- | | |
|------------------------------------|-----------------------------|
| • Title | • Procedure |
| • Scope and Application | • Calculations |
| • Summary | • Quality Control |
| • Sample Handling and Preservation | • Maintenance |
| • Interferences | • Corrective Action |
| • Apparatus and Materials | • Reference (Parent Method) |
| • Reagents | |

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. N/E
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/E
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. N/E
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: all parameters

Lab name: Test America

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Permit # : 1IG00000*FD
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Section J: Effluent/Receiving Water Observations

Outfall # 003

Outfall Description: No discharge during inspection

Receiving Stream: Great Miami River

Receiving Stream Description: satisfactory

Comments/Status:

Photos were taken of the wetlands area and 003 discharge point.

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: