



**Environmental
Protection Agency**

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

May 26, 2011

Hamilton County Board of Commissioners
138 E. Court Street, Room 603
Cincinnati, OH 45202

RE: MSD Little Miami WWTP Compliance Evaluation Inspection, NPDES
Permit No. OH0025453/ OEPA Permit No. PL00000*OD

Ladies and Gentlemen:

On May 18, 2011 I conducted an NPDES Compliance Evaluation Inspection at the Metropolitan Sewer District of Greater Cincinnati Little Miami Wastewater Treatment Plant. Barb Browne (Operator of Record), Ed Ewbank, Dave Bauer and Doug Handley were present for the facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

A copy of the Compliance Evaluation Inspection report is enclosed. All evaluated areas received "Satisfactory" ratings.

If you have any questions, please contact me by phone at (937) 285-6028 or by e-mail at michelle.waller@epa.state.oh.us.

Respectfully,

Michelle Waller
Environmental Specialist II
Division of Surface Water

Enclosures

Cc: Barb Wagner, MSDGC
Ed Ewbank, MSDGC



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
1PL00000*OD	OH0025453	05/18/2011	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
MSD Little Miami WWTP 225 Wilmer Avenue Cincinnati, Ohio 45226	9:50 AM	8/1/2009
	Exit Time	Permit Expiration Date
	12:30 PM	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Barb Browne, Operator of Record Dave Bauer, Plant Supervisor Doug Handley, Plant Supervisor Ed Ewbank, Senior Engineer	(513) 352-4929 (513) 352-4922 ext. 27 (513) 352-4922 ext. 23 (513) 244-5142	
Name, Address and Title of Responsible Official	Phone Number	
Hamilton County Board of Commissioners 138 E. Court Street, Room 603 Cincinnati, OH 45202	(513) 946-4400	

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)			
See attached report.			
Inspector		Reviewer	
<i>Michelle Waller</i>	<i>5/26/11</i>	<i>Martyn G. Burt</i>	<i>5/27/11</i>
Michelle Waller Division of Surface Water Southwest District Office	Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	Date

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) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant 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..... Y
- (e) Compliance schedule contained in...NPDES Permit Compliance Schedule
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Compliance checked from 11/1/2008 to 4/1/2011. Violations during this time period were:

<u>Reporting Period</u>	<u>Station</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
March 2011	003	Total Suspended Solids	7D Conc	45	58.	3/1/2011
March 2011	003	Total Suspended Solids	7D Qty	9368	12963.8	3/1/2011
October 2010	003	Fecal Coliform	7D Conc	400	410.539	10/1/2010
May 2009	003	Dissolved Oxygen	1D Conc	5.0	2.4	5/13/2009

Appropriate notification was given for these violations. No further information is needed.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- i. What does the back-up power source operate.....
- The backup generator is for emergency equipment – sumps, lights, interceptor gates.
- ii. How often is the generator tested under load.....
- Once per week under load.
- (b) Which components have an alarm system available for power or equipment failures.....
- SCADA alarms set for pump buildings and major equipment.
- (c) All treatment units in service other than backup units..... N
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....
- MAXIMO is MSDs computer program that tracks all maintenance.
- (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..... Y
- (h) Any plant upsets since last inspection..... Y

Comments/Status:

One primary and two secondary clarifiers are down for rechainning. Construction on the primary clarifier is scheduled to be completed the end of September 2011. Construction on the secondary clarifiers is expected to be completed the end of October 2011.

Incinerator has been down for maintenance. See Sludge Management section.

Plant bypasses – 004 has been active due to extremely wet weather. Last bypass was April 27, 2011

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... IV
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... Y
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Computer log.
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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 operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... Y
 - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications 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

Comments/Status:

A copy of the Operator of Records certificate is kept onsite, but not displayed. **Please post a copy of the unexpired certificate of the Operator of Record on-site.**

Collection System:

- (a) Are there pump stations in the collection system..... N/E
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....
 - ii. How many pump stations have telemetered alarms.....
 - iii. How many pump stations have operable alarms.....

- (b) Any chronic collection system overflows since last inspection..... N/E
- (c) Regulatory agency notified of all overflows..... N/E
- (d) Are there CSOs in the collection system..... N/E
if so, what is the LTCP status.....

- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....

- (f) Portable pumps available for collection system maintenance..... N/E
- (g) RDI Program established and active..... N/E
- (h) Any WIB complaint received since last inspection..... N/E
- (i) Is there a WIB response plan..... N/A
- (j) Is any portion of the collection system at or near dry weather capacity..... N/E

Comments/Status:

MSD has a separate Pump Stations/Collections group.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill
- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....
400,000 gallons, 30 wet tons (6 dry tons)
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A
- (h) Is a contractor used for sludge disposal..... Y
If so, what is the name of the contractor.....
Rumpke

Comments/Status:

The Incinerator at Little Miami has been down since the end of August. MSD is going to try to resume burning May 23, 2011. Work on the Incinerator has included a new dome, weir replacement, refractory replacement, new heat exchangers and duct work replacement.

When unable to run the Incinerator, Little Miami takes their sludge to the Mill Creek Incinerator or Rumpke.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
Currently being calculated from the influent. Flow meters are in 4 Mile Station and in the Little Miami pump station. Secondary effluent weirs are being calibrated.
- (b) Flow meter calibrated annually Y
(Date of last calibration: ongoing)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

Comments/Status:

Section I: Self-Monitoring Program (cont)

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
(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:

Section I: Self-Monitoring Program (cont)

Laboratory:

General

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

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).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (e) Analyses being performed more frequently than required by permit. N

- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab:

Lab name: MSD Polk Run

Discharge Monitoring Report Quality Assurance (DMRQA)

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

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 003

Outfall Description: Secondary treatment effluent to the Ohio River before combining with internal secondary treatment bypass.

Receiving Stream: Ohio River

Comments/Status:

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: