



**Environmental
Protection Agency**

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



1E0000120100415

HAMILTON PCS PURIFIED PHOSPHATES

OSIKA, MARY

2010/04/15



**Environmental
Protection Agency**

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

April 15, 2010

Jack Sullivan, Manager
PCS Purified Phosphates
10818 Paddys Run Road
Harrison, Ohio 45030

RE: Compliance Evaluation Inspection
NPDES Permit No. 11E00001*FD, OH0009211
Hamilton County

Dear Mr. Sullivan:

On April 7, 2010, I met with you at the facility to inspect the new wastewater treatment system. A copy of my inspection report is enclosed.

The facility received satisfactory ratings for all categories evaluated with the exception of effluent quality which was rated as unacceptable due to the effluent limit violations that have occurred during the review period.

The facility has been responsive to this issue and based upon the meeting, correspondence and site inspection, no response to this inspection report is necessary. If you have any questions regarding this letter or the inspection report, please contact me at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

Enclosure

Summary of Findings:

During the review period of 1/1/2009 – 4/1/2010 the following effluent limit violations were reported:

Parameter	Limit Type	Limit	Reported Value	Violation Date
Total Suspended Solids	1D Conc	45	158.	6/11/2009
Total Suspended Solids	30D Conc	30	158.	6/1/2009
Total Suspended Solids	1D Qty	7.4	11.6675	6/11/2009
Total Suspended Solids	30D Qty	4.9	11.6675	6/1/2009
Total Suspended Solids	1D Qty	7.4	11.9291	8/5/2009
Total Suspended Solids	30D Qty	4.9	11.9291	8/1/2009
Copper, Total (Cu)	1D Conc	80	318.	10/26/2009
Copper, Total (Cu)	30D Conc	46	318.	10/1/2009
Copper, Total (Cu)	1D Qty	0.013	.0346	10/26/2009
Copper, Total (Cu)	30D Qty	0.007	.0346	10/1/2009
Copper, Total (Cu)	1D Conc	80	410.	2/5/2010
Copper, Total (Cu)	30D Conc	46	410.	2/1/2010
Copper, Total (Cu)	1D Qty	0.013	.03316	2/5/2010
Copper, Total (Cu)	30D Qty	0.007	.03316	2/1/2010

On March 12, 2010, I met with Brad Peacock, Director of PCS Administration and Jack Sullivan, Plant Manager of PCS Purified Phosphates Cincinnati plant. We discussed the violations and the actions that the company was taking to meet the NPDES permit limits.

At the time of the inspection, the company had identified the problems and had come up with a plan to prevent further violations. They are batch treating, testing and then discharging if the effluent meets the limits in the permit. If the testing does not meet the limits, the wastewater is diverted to a larger tank for further treatment. They are also in the process of removing the source of the problem from the wastewater as much as possible. The main source is the Potassium pyro-phosphate line. They have also hired URS consultants to look at further ways of making their ion exchange system more effective.

During the inspection, I informed the plant manager that Ohio EPA will be starting the TMDL study of the lower portion of the Great Miami River this year. We will communicate the results of the study and invite all the stake holders in any public participation meetings. I discussed that nutrient issues/reduction will most likely be a result of the study. The company is aware that their phosphorus levels may need to be lowered and they will be looking at ways to do this in their contract with URS consultants.



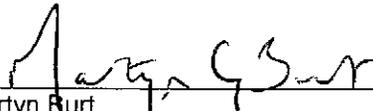
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IE00001*FD	OH0009211	4/7/2010	C	S	Industrial

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Potash Corporation of Saskatchewan Purified Phosphates Cincinnati Production Plant 10818 Paddys Run Road Fernald, Ohio		10:30 am	Sept. 1, 2006
		Exit Time	Permit Expiration Date
		12:00 pm	Aug. 31, 2011
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)	
Jack Sullivan, Plant Manager		(513) 738-1261 x 246	
Name, Address and Title of Responsible Official		Phone Number	
Jack Sullivan, Plant Manager PCS Purified Phosphates 10818 Paddys Run Road Harrison, OH 45030		(513) 738-1261 x 246	

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	U	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 Summary.	
Inspector	Reviewer
 Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4/15/2010 Date	4/15/10 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) 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)..... N/A
- (e) Flows and loadings conform with NPDES permit..... N/A
- (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:

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/A

Comments/Status:

See attached summary.

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.....

lights, processing plant, wwtp

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

Quarterly

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

Process control loop closes discharge to river. No alarm to operator, system visually checked daily

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

(d) What method is used for scheduling routine & preventative maintenance (PM software)..... Y

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

(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:

(e) not equipment breakdown, but total renovation of treatment units and consolidation into one building.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill
- (a) Has amount of sludge generated changed significantly since the last inspection..... N
- (b) How much sludge storage is provided at the plant.....
sewage holding tank
- (c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (d) Any complaints received in last year regarding sludge..... N
- (e) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (f) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A

Comments/Status:

(a) facility uses a sewage holding tank for wastewater removal by Savings Liquid Waste. MSD is the recipient of wastewater.

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):
In-line flow meter with totalizer, back-up portable ultra sonic
- (b) Calibration frequency adequate Y
(Date of last calibration: new)
- (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:

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) 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 (con't)

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:
 - 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. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y

- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: all except TSS (in house)

Lab name: Cardinal Labs – metals sometimes, if needed quickly
Test America – all parameters

Discharge Monitoring Report Quality Assurance (DMRQA)

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

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: force main pipe to river

Receiving Stream: Great Miami River

Receiving Stream Description:

No discharge viewed on day outfall seen; river conditions satisfactory.

Comments/Status:

No discharge during time of inspection. Outfall previously viewed on March 1, 2010 next to Nease Corp.'s outfall.

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

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- (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:

