



**Environmental  
Protection Agency**

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



\*1PD0000320090211\*

BUTLER

FAIRFIELD WWTP

SARLE, EDWARD

2009/02/11

20wagp  
Fairfield  
USWA



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249  
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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

February 11, 2009

Mr. Dave Crouch  
City of Fairfield  
5350 Pleasant Avenue  
Fairfield, Ohio 45014

**Re: Butler County, City of Fairfield, Compliance Evaluation Inspection  
NPDES Permit No. OH0025071, OEPA Permit No. 1PD00003\*ND**

Dear Mr. Culbertson:

On January 26, 2009, I conducted a Compliance Evaluation Inspection at this facility. Representing this facility was Drew Young, Jason Hunold and you. A copy of my inspection report is enclosed.

The inspection report contained one marginal area. The Effluent / Receiving Water section was rated marginal as a result of the NPDES Permit violations.

Storm water discharges from this facility have not been permitted. The City of Fairfield must address this area as soon as possible but not later than March 6, 2009.

If you have any questions, please call me at (937) 285 - 6096.

Sincerely,

Ned Sarle  
Division of Surface Water  
Permits Group

Enclosures

cc: Drew Young, City of Fairfield





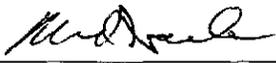
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PD00003*ND	OH0025071	1/26/2009	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Fairfield WWTP 4799 Groh Lane Fairfield, Ohio 45014	10:15 A.M.	7/1/2003
	Exit Time	Permit Expiration Date
	1:00 P.M.	6/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Dave Crouch, Director of Public Utilities	(513) 896-8157	
Drew Young, Public Utilities Superintendent	(513) 858-7760	
Jason Hunold, Chief Operator	(513) 858-7760	
Name, Address and Title of Responsible Official	Phone Number	
Dave Crouch, Director of Public Utilities 5350 Peasant Avenue Fairfield, Ohio 45014	(513) 896-8157	

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	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 Ned Sarle Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
2/11/09 Date	2/11/09 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) 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..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

None.

**Section F: Permit Violations / Compliance Schedules**

- (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:

See Attached Summary of Findings / Comments.

**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)..... IV
- (e) Operator of Record holds unexpired license of class required by permit..... Y  
 Class: IV
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (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..... Y
- (l) Regulatory agency notified of bypasses..... Y  
 On MORs  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

**Record Keeping:**

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

Log Book.
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
  - I. Identification of treatment works..... N
  - 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..... Y  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (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..... N
- (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..... N
- (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:**

See Attached Summary of Findings / Comments.

**Section H: Sludge Management**

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

**Comments/Status:**

**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: 12/18/2008)
- (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 monitoring equipment is capable of measuring between 0 and 33 MGD.

**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).. N/E
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/E
- (c) Analyses being performed more frequently than required by permit. N/E
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/E
- (e) Commercial laboratory used..... N/E  
Parameters analyzed by commercial lab:

Lab name:

*Quality Control/Quality Assurance*

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

Satisfactory  Marginal  Unsatisfactory

Date:

**Comments/Status:**

None.

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Outfall signage	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	n/a	-	-	-	-	-	clear	

**Comments/Status:**

None.

**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:**

None.

## Summary of Findings / Comments

### Areas Requiring a Response

Storm water discharges from sewage treatment systems with a design flow rate of 1.0 MGD or greater are required to have a general Industrial Storm Water permit. The City of Fairfield has failed to obtain coverage under this permit. The City of Fairfield may obtain this coverage by either submitting NPDES Permit Application Form 2F or a NOI for a general permit. The Ohio EPA would recommend obtaining coverage under the general storm water permit. The NOI application may be obtained at the following website: <http://www.epa.state.oh.us/dsw/storm/stormform.html> . A copy of the Industrial General Storm Water Permit may also be viewed at the following website: [http://www.epa.state.oh.us/dsw/permits/GP\\_IndustrialStormWater.html](http://www.epa.state.oh.us/dsw/permits/GP_IndustrialStormWater.html) . The NOI and \$200 application fee must be submitted to the Ohio EPA, Central Office.

### Areas Not Requiring a Response

A review of the Monthly Operating Reports (MORs) for April 2007 through November 2008 indicated several violations. These violations are listed on Attachment I. At this time, the Fairfield WWTP has adequately addressed these violations. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The Fairfield WWTP is designed to treat an average daily flow (ADF) of 10.0 MGD and a peak daily flow (PDF) of 18.0 MGD. For April 2007 through November 2008, the Fairfield WWTP treated an ADF of 5.31 MGD and a PDF of 19.96 MGD. The peak flow event occurred on March 19, 2008 when 4.9 inches of rain fell during a 40 hour period. This was approximately a 25 year rain event.

During this March 2009 rain event, the City of Fairfield (Fairfield) reported several bypasses from their sewage collection and treatment system. For March 19 and 20, 2009, the Ross Road manhole bypassed 79,500 gallons; the Crystal Road Pump Station bypassed 475,000 gallons; the WWTP flow equalization basin bypassed 1,392,000 gallons; the primary treatment system bypassed 3,290,000 gallons, and the secondary treatment system bypassed 14,676,864 gallons.

The sanitary sewers are cleaned an average of once every five years. Sanitary sewers are visually inspected once every ten years. Sources of I/I are eliminated as found. A sewage collection system hydraulic model has also been completed. Fairfield must continue their efforts to minimize I / I into the sanitary sewer.

All future sewage collection system bypasses must be reported in accordance to the NPDES Permit as detailed in Part III, Section 11 titled "Unauthorized Discharges." Bypasses from the flow equalization basin or from the external WWTP bypass pipe must also be reported in this manner. Internal WWTP bypasses of the primary and

NPDES Permit #: OH0025071  
OEPA Permit #: 1PD00003\*ND

secondary treatment system must be reported at station 602. In the next NPDES Permit renewal, the Ohio EPA will clarify the reporting requirements.

Two additional bypasses were reported at the WWTP in September 2008. On September 6, 2008, the WWTP bypassed 10,000 gallons due to work on the electrical system. On September 14, 2008, the WWTP bypassed 572,000 gallons due to area wide power outages caused by a windstorm. This disrupted the two power feeds serving the WWTP. Fairfield took all feasible action to minimize these bypasses.

During the September 2008 wind storm, the two power feeds to the Fairfield WWTP were disrupted. Fairfield is considering installing a back up generator at the WWTP. A backup generator would provide for a more reliable power source. The Ohio EPA would recommend using a backup generator instead of the dual power feed.

Sludge is land applied by Oros and Busch. They have had this sludge contract since May 2008.

NPDES Permit #: OH0000071  
OEPA Permit #: 1PD00003\*ND

Attachment I

Effluent Limit Violations for April 2007 through November 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
August 2008	Ammonia	Monthly	mg/l	1.6	2.5
August 2008	Ammonia	Weekly	mg/l	2.4	2.5
August 2008	Ammonia	Weekly	mg/l	2.4	3.4