



**Environmental
Protection Agency**

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



11B0000820110330

BUTLER

HAMILTON MUNICIPAL ELECTRIC PLANT *

SARLE, EDWARD

2011/03/30



Environmental
Protection Agency

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

Sewage

March 30, 2011

Mr. Joshua Smith
City of Hamilton
345 High Street, 7th Floor
Hamilton, Ohio 45011

Re: Butler County, Hamilton Municipal Electric Plant
Compliance Evaluation Inspection

Dear Mr. Smith:

On March 22, 2011, I conducted a Compliance Evaluation Inspection at the Hamilton Municipal Electric Plant (NPDES Permit No. OH0010413; OEPA Permit No. 11B00008*KD). Representing this facility was Al Scobee, Darla Bokeno, Dave Anson, Mark Doty and Julie Wagner. A copy of my inspection report is enclosed.

All areas evaluated in the inspection report were found to be acceptable. However, several areas were noted as requiring a response.

The areas noted in the report summary will require a written response by April 22, 2011. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

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

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Al Scobee, City of Hamilton
Julie Wagner, Environmental Quality Management, Inc.



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
11B00008*KD	OH0010413	3/22/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Hamilton Municipal Electric Plant 960 North Third Street Hamilton, Ohio 45011	9:30 A.M.	11/1/2009
	Exit Time	Permit Expiration Date
	12:30 P.M.	7/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Al Scobee, Plant Superintendent	(513) 785-7461	
Darla Bokeno, Administrative Specialist	(513) 785-7211	
Dave Anson, Water Tender	(513) 785-7450	
Julie Wagner, Environmental Quality Management Inc.	(513) 785-7480	
Mark Doty, CODACO Engineering	(513) 785-7482	
Name, Address and Title of Responsible Official	Phone Number	
Joshua Smith, City Manager 345 High Street, 7th Floor Hamilton, Ohio 45011	(513) 785-7000	

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	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	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
<i>Ned Sarle</i> Ned Sarle Division of Surface Water Southwest District Office	<i>Martyn G Burt</i> Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
3/30/11 Date	3/30/11 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)..... Y
- (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/A
- (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..... Y

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)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
 Class: I
- (f) Copy of certificate of Operator of Record displayed on-site..... N/A
- (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..... N/A
- (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..... N/A
- (b) Format of log book (i.e. computer log, hard bound book)
- (c) Log book(s) kept onsite (in an area protected from weather)..... N/A
- (d) Log book contains the following:
 - I. Identification of treatment works..... N/A
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N/A
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N/A
 - IV. Laboratory results (unless documented on bench sheets)... N/A
 - V. Identification of person making log entries..... N/A
- (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: %
- (b) Any collection system overflows since last inspection..... N/A
(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..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

None.

Section H: Sludge Management

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

Comments/Status:

None.

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: pump calculations)
- (b) Calibration frequency adequate N/A
(Date of last calibration:)
- (c) Secondary instruments operated and maintained..... N/A
- (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:

None.

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..... N/A
 - (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. Y
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: Oil & Grease, TSS, Metals, and Bis (2-ethylhexyl) Phthalate

Lab name: Hamilton WWTP and Ginosko

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... N/A
- (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:

Comments/Status:

The DMRQA study indicated that the results for mercury and copper were wrong. These errors were due to the contact lab having a failure with their equipment. This has been addressed at this time.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall signage	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
003	Yes							
005	Yes							
007	Yes							
008	Yes							

Comments/Status:

Outfalls 005, 007 and 008 were under water and could not be observed. Outfall 003 was not observed due to high stream flows.

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

The temperature, chlorine residual and pH are tested on-site. The TSS and Oil & Grease samples are transported to the Hamilton WWTP to be tested. The metals and Bis (2-ethylhexyl) Phthalate are transported to the Hamilton WWTP where they are shipped to the Ginosko lab. Standard Operating Procedures (SOPs) for the tests conducted at the power plant must be developed. SOPs for the wastewater sample collection and handling must also be developed. Hamilton does not have these written SOPs. The written SOPs must be completed by September 30, 2011. Please notify this office once these SOPs are completed. Finally, a General Lab Criteria checklist was provided during the inspection. We will be using this check list during future inspections.

The thermometers used to monitor the effluent temperatures must be checked in some fashion using an NIST thermometer.

The effluent samples that are transported to the Hamilton WWTP are sometimes stored in a refrigerator. The temperature in this refrigerator is not recorded to ensure the samples are maintained below 6 degrees Celsius. Food is also stored in this refrigerator. Both of these practices are not acceptable. The refrigerator temperature must be recorded and the food must be stored in another location. Another option is to immediately place these effluent samples in a cooler with ice.

Areas not Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) for February 2009 through February 2011 indicated two effluent violations. These violations are listed on Attachment I. At this time, the City of Hamilton (Hamilton) 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."

In 2010, approximately 12,000 tons of flue gas desulfurization (FGD) solids were generated. This material is hauled to the Duke Energy East Bend Power Plant for reuse. In 2010, approximately 7000 tons of fly ash and bottom ash were also produced. Of this total, a cement plant in Indiana received 2500 tons, and the Rumpke Landfill in Hamilton County received 4500 tons.

A Storm Water Pollution Prevent Plan has been written and implemented for the facility.

Later this summer, Hamilton will be conducting a test on their facility where all four of the turbines will be operated during a peak demand period. These periods typically occur during the summer when stream flows are low. Hamilton will need to carefully monitor this test to ensure the temperature limits are not violated.

Attachment I						
Effluent Limit Violations for February 2009 through February 2011						
Reporting Period	Station	Parameter	Limit Type	Units	Permit Limit	Reported Value

June 2009	005	pH	Daily	S.U.	6.5	5.7
July 2009	006	TSS	Monthly	kg/day	61	62