



**Environmental  
Protection Agency**

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



\*1PE0000220070626\*

BUTLER

HAMILTON WWTP

SARLE, EDWARD

2007/06/26

sewage



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

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

June 25, 2007

Mr. Mark Brandenburger  
City of Hamilton  
One Renaissance Building  
345 High Street  
Hamilton, Ohio 45011

**Re: Butler County, Hamilton WWTP, Compliance Evaluation Inspection**

Dear Mr. Brandenburger:

On June 11, 2007, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0025445; OEPA Permit No. 1PE00002\*KD). Billy Slaven, Greg Hildebrand, Jane Winkler and Alison Haskins were representing this facility. A copy of my inspection report is enclosed.

All areas evaluated in the inspection report were satisfactory. Therefore, no response is required at this time.

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

Sincerely,

Ned Sarle  
Division of Surface Water  
Permits Section

Enclosure

cc: Billy Slaven, City of Hamilton



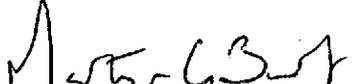
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PE00002*KD	OH0025445	6/11/2007	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Hamilton WWTP 2451 River Road Hamilton, Ohio 45015	12:05 P.M.	8/1/2003
	Exit Time	Permit Expiration Date
	3:15 P.M.	6/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Billy Slaven, Wastewater Superintendent	(513) 868-5971	
Greg Hildebrand, Assistant Wastewater Superintendent	(513) 868-5971	
Jane Winkler, Laboratory Supervisor	(513) 868-5971	
Alison Haskins, City Engineer	(513) 785-7277	
Name, Address and Title of Responsible Official	Phone Number	
Mark Brandenburger, City Manager One Renaissance Building 345 High Street 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
 6/25/07	 6/26/07
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit # : 1PE00002\*KD  
NPDES #: OH0025445

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..... N
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

See Attached Summary of Findings / Comments.

**Section E: Permit Verification**

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... Y
- (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) Operator holds unexpired license of class required by permit..... N  
Class: IV
- (f) Routine and preventative maintenance schedule/performed  
on time..... Y
- (g) Any major equipment breakdown since last inspection..... N
- (h) Operation and maintenance manual provided and maintained..... Y
- (i) Any plant bypasses since last inspection..... Y
- (j) Regulatory agency notified of bypasses..... Y
- On MORs  and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... Y

**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..... Y
- (j) Any complaints received since last inspection of basement flooding Y
- (k) Are any portions of the sewer system at or near capacity..... Y

**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:**

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: Radar / Open Channel)
  
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration: 5/23/2007)
- (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 may measure between 0 - 70 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).. 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: Metals, Cn, and Mercury.

Lab name: Ginosko Laborties, Inc.

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... Y
- (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:**

None.

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

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	-	-	-	-	-	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**

A review of the Monthly Operating Reports (MORs) for the period of May 2006 through April 2007 indicated one NPDES Permit violation. This violation is noted on Attachment I. Hamilton has adequately addressed this violation. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

On January 19, 2007, a new Consent Order (CO) became effective for the City of Hamilton (Hamilton). Hamilton was in violation of the previous CO due to bypasses from the sewage collection and treatment system. The new CO requires Hamilton to take action to address these bypasses.

All Sanitary Sewer Overflows (SSOs) are required to be reported in accordance to the NPDES Permit and the CO. Hamilton must report the SSOs in accordance to the NPDES Permit as detailed in Part III, Section 11 titled "Unauthorized Discharges" and in Part III, Section 12 titled "Noncompliance Notification." The CO requires SSOs from overflow locations 002, 014, 022, 027 and 037 to be reported on the Monthly Operating Reports (MORs). The Ohio EPA received the MORs for February 2007. However, the March and April 2007 MORs have not been submitted as required by the CO. Hamilton must submit these reports. Finally, Hamilton is not required to submit hard copies of these MORs.

For the SSOs locations addressed in the CO, Attachment II contains the bypasses reported for January through April 2007. Future SSOs must continue to be reported in accordance to the NPDES Permit and the CO.

The WWTP is designed for an average daily flow rate of 32.0 MGD. Flows greater than 32.0 MGD may be stored in the 4.5 million gallon storage facility. This storage facility consists of the old primary clarifiers, aeration tanks and secondary clarifiers. The bypassed wastewater is then treated in the disinfection system.

A review of the MORs for May 2006 through April 2007 indicated the average daily flow was 17.35 MGD. The peak daily flow rate was reported as 47.92 MGD. This peak flow rate occurred on January 15, 2007. Smart Papers LLC contributed between 4 to 5 MGD of wastewater.

The CO requires the internal bypass be reported on the MORs as station 603. Attachment III addresses internal bypasses reported for February through April 2007. Two internal bypasses were reported in February 2007. These bypasses were caused by a rain event. The continued use of the internal bypass is being addressed in the CO. Hamilton is required to provide a "no feasible alternative" analysis on this bypass. This analysis is required to be submitted by January 1, 2008 as part of the SECAP and implementation schedule.

For many years, the Hamilton WWTP has experienced color pass through as a result of two local industrial dischargers. The color wastewater discharged from the WWTP alters the receiving stream color and is a violation of the NPDES Permit and the Water Quality Standards. Since the last inspection, a color pass through event was reported on August 1 – 4, 2006. Smart Papers LLC caused this violation. Hamilton must continue their work with these local companies to prevent color discharges from the WWTP.

The Hamilton WWTP is required to be under the supervision of a Class IV wastewater treatment plant operator. Mr. Billy Slaven has been the WWTP Superintendent since September 11, 2006. He is currently a Class III operator. Mr. Slaven is in the process of obtaining his Class IV operator's certification. Mr. Slaven hopes to obtain the certification this year.

Sludge produced at the Hamilton WWTP is land applied, composted or land filled. Synagro land applies the lime stabilized sludge. They are also contracted to haul the sludge to Rumpke land fill. The composted sludge is removed by W.D. Miller and taken to Latham, Ohio in Pike County. The composted sludge is then used as a soil amendment and is sold around the state.

Since the last inspection, Hamilton has received several WWTP odor complaints.

The WWTP is staffed 24 hours a day for 7 days a week.

Attachment I

NPDES Permit Violations

May 2006 through April 2007

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
May 2006	chlorine	Daily	mg/l	0.037	0.11

Attachment II

City of Hamilton

Sewage Collection System Bypasses for January through April 2007

Monitoring Station	Parameter	Units	Date	Reported Value
27	Flow Rate	MGD	1/13/2007	0.920823
37	Flow Rate	MGD	1/13/2007	0.476874
27	Flow Rate	MGD	1/14/2007	0.223577
27	Flow Rate	MGD	1/15/2007	3.231653
37	Flow Rate	MGD	2/24/2007	0.06124
27	Flow Rate	MGD	2/25/2007	0.53737
37	Flow Rate	MGD	2/25/2007	0.39677
27	Flow Rate	MGD	3/1/2007	0.501458
37	Flow Rate	MGD	3/1/2007	0.140636
27	Flow Rate	MGD	3/2/2007	0.011465
27	Flow Rate	MGD	4/11/2007	0.107076
37	Flow Rate	MGD	4/11/2007	0.269205

Attachment III

City of Hamilton

WWTP Bypasses for January through April 2007

Station	Parameter	Units	Date	Reported Value
603	Bypass Volume	MGAL	2/25/2007	6.661
603	Bypass Volume	MGAL	2/26/2007	1.583