



**Environmental
Protection Agency**

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



1IN0009320080430

CHAMPAIGN ORBIS CORP *

REYNOLDS, JOSEP 2008/04/30



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 30, 2008

Judy Sanders
Orbis Corporation
200 Elm Street
Urbana, Ohio 43078

RE: Orbis Corporation Reconnaissance Inspection.

Dear Ms. Sanders:

On April 10, 2008 a representative of the Ohio EPA (Mr. Joe Reynolds) conducted a Reconnaissance Inspection at the Orbis facility, 200 Elm Street, Urbana. The inspection was conducted as part of the National Pollutant Discharge Elimination System (NPDES) permit renewal process for the facility.

The inspection report is attached. There are six items that require a response. The response dates are noted in the report. You will be receiving a draft NPDES permit (the renewal permit will remain draft for a period of 30 day to allow for public comment) later this summer. If you have questions, comments, or correction concerning the draft, you should contact the district (Joe Reynolds, 937 285 - 6097) during the 30 day comment period.

If you have any questions regarding the report, please feel free to contact Mr. Reynolds at the number above.

Sincerely,

Martyn Burt, Environmental Supervisor
Division of Surface Water

cc: Kelly Hurley, Env. Health and Safety Coordinator
Tony Bowles, Maintenance Engineer

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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
1IN00093*GD	OH0049972	4/10/2008	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Orbis Corporation 200 Elm Street Urbana, Ohio 43078	9:15 AM	10/1/2003
	Exit Time	Permit Expiration Date
	11:00 AM	9/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Kelly Hurley, Env. Health and Safety Coordinator Tony Bowles, Maintenance Engineer	(937) 652 - 1361 ext. 115 Fax (937) 484 - 4375	
Name, Address and Title of Responsible Official	Phone Number	
Judy Sanders 200 Elm Street Urbana, Ohio 43078		

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
U	Permit	M	Flow Measurement	N	Pretreatment
M	Records/Reports	N	Laboratory	N	Compliance Schedule
U	Operations & Maintenance	M	Effluent/Receiving Waters	U	Self-Monitoring Program
M	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)
See attached report.

Inspector	Reviewer
<i>Joe Reynolds</i> 4/30/08	<i>Martyn Burt</i> 4/30/08
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Inspection Findings

Orbis Corporation was issued National Pollutant Discharge Elimination System (NPDES) permit number 11N00093*GD on September 8, 2003. This permit expires September 30, 2008. At the time of this inspection an NPDES renewal application had not been submitted.

Orbis Corporation discharges non-contact cooling water and storm water through outfall 001 to a storm sewer that ultimately discharges to Dugan Run. The permit also contains two storm water only outfalls, 002 and 003.

All of the indoor drains (except for the non-contact cooling water drains) go to the City of Urbana sanitary sewer. These drains are used to collect sanitary waste water and blow down water.

Orbis directs non-contact cooling water from two separate drains to a city storm sewer east of the facility. Down spouts from the facility are also tied to this drain. There are no air pollution control devices on the roof. There are storm water sources upstream of sampling point 001 that are not associated with Orbis.

Acid is added to the cooling towers to control scale build-up. Conductivity sensors and pH sensors are used to control the feed rate.

Flows are estimated based on pump run times. An hour meter is used to record total run time.

Orbis has not updated their Storm Water Pollution Prevention Plan (SWPPP) to reflect current personnel changes and operations. The plan is not currently being implemented. On-site representatives were unaware of the locations for outfalls 002 and 003.

Screens were placed on the storm sewer inlets at the facility. Plastic beads and lids were noted on the screens by the railroad track unloading area (east side of building).

Orbis has experienced problems in the collection and storage of final effluent sampling data. In 2002/2003 temperature and pH violations were attributed to faulty sampling equipment. In 2006 computer software storage issues contributed to lost data and sampling frequency violations. In 2007 a monitoring computer power failure contributed to a loss of sampling data. At this same time the pH monitoring system was found to be defective (probe failure).

A review of final effluent sampling data from January 1, 2006 to February 29, 2008 revealed the following final effluent violations: 45 pH limitation violations, 1 pH frequency violation, 18 temperature frequency violations, and 18 flow frequency violations.

Items Requiring a Response

1. An NPDES renewal application Form 1 and 2C must be submitted to this office as soon as possible. This application must be received by no later than ~~May 9, 2008~~. *May 27, 2008*
2. Orbis must perform a feasibility and cost study for the establishment of a new 001 sampling location. The new station must allow Orbis to obtain representative samples from the non-contact cooling water system while eliminating possible interferences from extraneous contamination sources. The results of this study must be submitted to the Ohio EPA by no later than July 14, 2008.
3. A sampling equipment operations and maintenance plan must be developed for all monitoring equipment being used to document NPDES permit compliance. The plan must be designed to insure this equipment remains in service and is recording accurate information. At a minimum the plan must address routine maintenance, equipment calibration, quality assurance checks, and back-up monitoring and recording systems. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
4. In order to provide a better estimate of actual non-contact cooling water flows being discharged, an effluent flow metering systems must be established on the non-contact cooling water effluent lines. A Permit to Install application and detailed plans for the flow monitoring system must be submitted to the Ohio EPA by no later than July 14, 2008.
5. An updated Storm Water Pollution Prevention Plan which reflects current conditions and practices must be submitted to this office. As part of this plan a site map which identifies all storm water discharge locations must be developed. The exact location (including Latitude and longitude locations) of outfalls 002 and 003 must be identified. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
6. All residual materials that collect on the storm screens must be removed on a regular basis to ensure that they do not enter the storm system. Regular inspections of all storm water controls and discharge locations should be performed as part of the storm water program. A copy of the storm water inspection sheets from the last 6 months must be submitted to the Ohio EPA by no later than May 9, 2008 (if available).



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State of Ohio Environmental Protection Agency

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Southwest District Office

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Dayton, Ohio 45402

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Southwest District
Lee Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



April 30, 2008

Judy Sanders
Orbis Corporation
200 Elm Street
Urbana, Ohio 43078

Bruce Mapes
Plant Manager

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Eric - (937) 605-6346
Swenson

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www.orbiscorporation.com



RE: Orbis Corporation Reconnaissance Inspection.

Dear Ms. Sanders:

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If you have any questions regarding the report, please feel free to contact Mr. Reynolds at the number above.

Sincerely,

Martyn G. Burt

Martyn Burt, Environmental Supervisor
Division of Surface Water

consulting
→ *Eric Swenson*
(937) 869-4786

cc: Kelly Hurley, Env. Health and Safety Coordinator
Tony Bowles, Maintenance Engineer





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
11N00093*GD	OH0049972	4/10/2008	R	S	1

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Judy Sanders 200 Elm Street Urbana, Ohio 43078		

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Section D: Summary of Findings (Attach additional sheets if necessary)
See attached report.

Inspector	Reviewer
<i>Joe Reynolds</i> 4/30/08	<i>Martyn Burt</i> 4/30/08
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



Inspection Findings

Orbis Corporation was issued National Pollutant Discharge Elimination System (NPDES) permit number 11N00093*GD on September 8, 2003. This permit expires September 30, 2008. At the time of this inspection an NPDES renewal application had not been submitted.

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Flows are estimated based on pump run times. An hour meter is used to record total run time.

Orbis has not updated their Storm Water Pollution Prevention Plan (SWPPP) to reflect current personnel changes and operations. The plan is not currently being implemented. On-site representatives were unaware of the locations for outfalls 002 and 003.

Screens were placed on the storm sewer inlets at the facility. Plastic beads and lids were noted on the screens by the railroad track unloading area (east side of building).

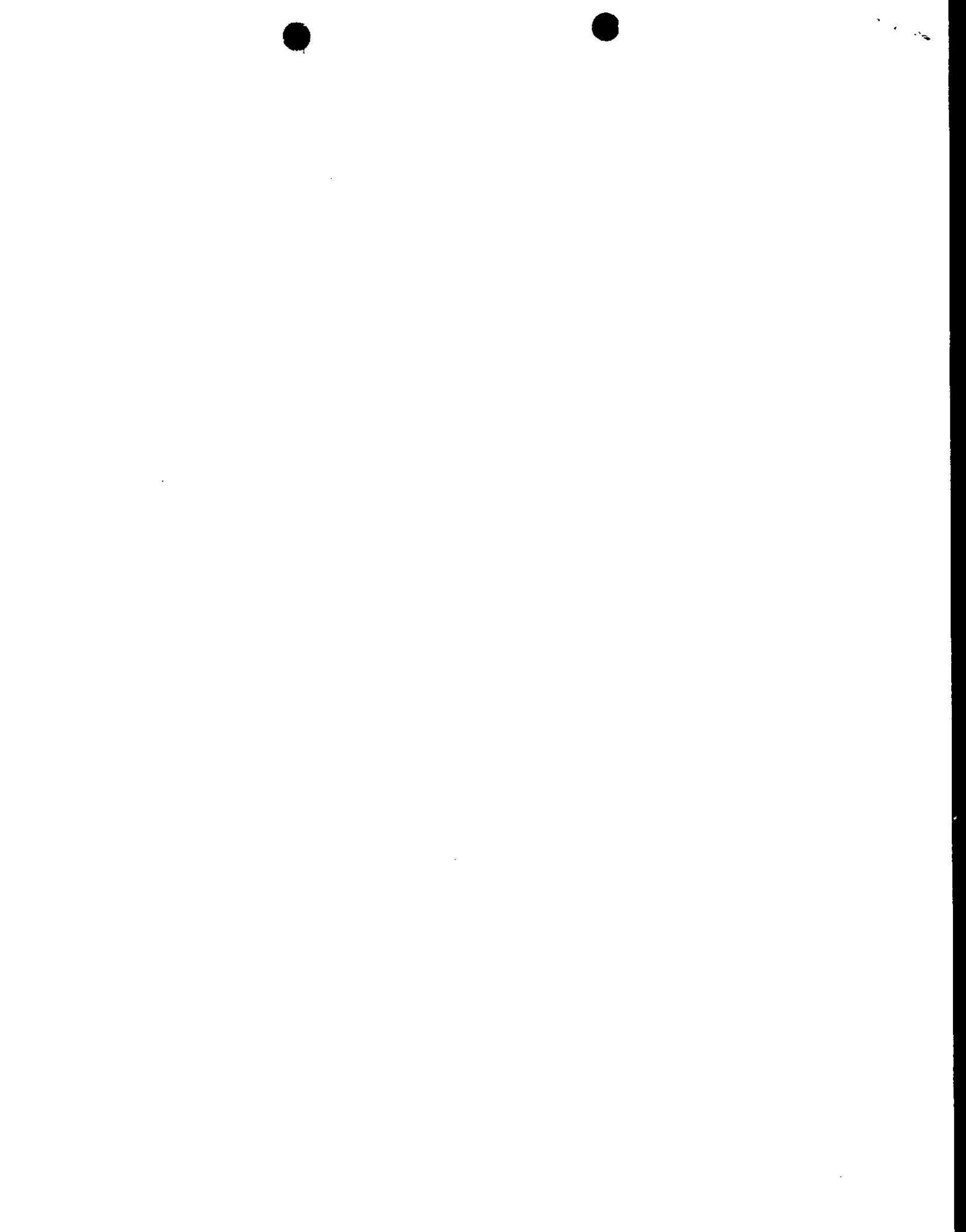
Orbis has experienced problems in the collection and storage of final effluent sampling data. In 2002/2003 temperature and pH violations were attributed to faulty sampling equipment. In 2006 computer software storage issues contributed to lost data and sampling frequency violations. In 2007 a monitoring computer power failure contributed to a loss of sampling data. At this same time the pH monitoring system was found to be defective (probe failure).

A review of final effluent sampling data from January 1, 2006 to February 29, 2008 revealed the following final effluent violations: 45 pH limitation violations, 1 pH frequency violation, 18 temperature frequency violations, and 18 flow frequency violations.



Items Requiring a Response

1. An NPDES renewal application Form 1 and 2C must be submitted to this office as soon as possible. This application must be received by no later than May 9, 2008.
2. Orbis must perform a feasibility and cost study for the establishment of a new 001 sampling location. The new station must allow Orbis to obtain representative samples from the non-contact cooling water system while eliminating possible interferences from extraneous contamination sources. The results of this study must be submitted to the Ohio EPA by no later than July 14, 2008.
3. A sampling equipment operations and maintenance plan must be developed for all monitoring equipment being used to document NPDES permit compliance. The plan must be designed to insure this equipment remains in service and is recording accurate information. At a minimum the plan must address routine maintenance, equipment calibration, quality assurance checks, and back-up monitoring and recording systems. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
4. In order to provide a better estimate of actual non-contact cooling water flows being discharged, an effluent flow metering systems must be established on the non-contact cooling water effluent lines. A Permit to Install application and detailed plans for the flow monitoring system must be submitted to the Ohio EPA by no later than July 14, 2008.
5. An updated Storm Water Pollution Prevention Plan which reflects current conditions and practices must be submitted to this office. As part of this plan a site map which identifies all storm water discharge locations must be developed. The exact location (including Latitude and longitude locations) of outfalls 002 and 003 must be identified. This plan must be submitted to the Ohio EPA by no later than June 16, 2008.
6. All residual materials that collect on the storm screens must be removed on a regular basis to ensure that they do not enter the storm system. Regular inspections of all storm water controls and discharge locations should be performed as part of the storm water program. A copy of the storm water inspection sheets from the last 6 months must be submitted to the Ohio EPA by no later than May 9, 2008 (if available).





**Environmental
Protection Agency**

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



1PV0004720101008

CHAMPAIGN, ROLLING HILLS MHP STP

REYNOLDS, JOSEP 2010/10/08



**Environmental
Protection Agency**

Tim Swiftland, Governor
Lee Fisher, Lt. Governor
Chris Kostasik, Director

October 7, 2010

Mr. Jim Moore
Moore Enterprises
4425 West Airport Freeway
Suite 475
Irving, Texas 75062

**RE: Rolling Hills MHP Notice of Violation / Reconnaissance Inspection, NPDES
Permit No. 1PV00047*ED/OH0046850, Champaign**

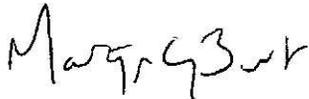
Dear Mr. Moore:

On October 5, 2010 Joe Reynolds inspected the Rolling Hills MHP waste water treatment plant, 5579 Springfield Urbana Pike, Urbana Township, Champaign County. The inspection was conducted as part of a compliance review of the plant with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit issued to the park.

The findings from this inspection are included in the attached report. The report contains three items that require a response. Please provide a written response to these items by the dates noted in the inspection report.

If you have any questions regarding the report, you may contact Joe Reynolds at (937) 285-6097.

Sincerely,



Martyn G. Burt
Division of Surface Water

Enclosure

cc: Robert Armstrong, Winelco
Mike Roberts, Manager



Handwritten marks and scribbles in the top right corner.



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
1PV00047*ED	OH0046850	10/5/2010	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Rolling Hills MHP 5579 Springfield Urbana Pike Urbana, Ohio 43078	10:00 AM	8/1/2007
	Exit Time	Permit Expiration Date
	11:35 AM	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bob Armstrong, Operator Mike Roberts, Manager	(513) 317 - 8672 (937) 408 - 3133	
Name, Address and Title of Responsible Official	Phone Number	
Jim Moore, Moore Enterprises 4425 West Airport Freeway Road Suite 475 Irving, Texas 75062		

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
M	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	
Inspector	Reviewer
<i>Joe Reynolds</i> Date 10/7/10	<i>Martyn G Burt</i> Date 10/8/10
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



Inspection Findings

The Rolling Hills MHP currently holds National Pollutant Discharge Elimination System (NPDES) permit number 1PV00047*ED, OH0046850. This permit expires July 31, 2012.

The Rolling Hills MHP waste water system consist of an influent lift station, flow equalization, (2) extended aeration tanks, (2) clarifiers, a dosing tank, (4) tertiary sand filters, UV disinfection, and aerated sludge holding.

Standby power currently is unavailable to the plant. A vac truck is used to remove solids from the system during power outages. The cost to install a back-up generator is currently being evaluated.

All of the pumping facilities (lift station, equalization tank, and tertiary dosing) are alarmed. Maintenance staff performs daily inspections of the entire system to ensure system performance.

Robert Armstrong along with Robert Gomez and Andrew Grinner serve as the Operators of Record for the plant. An Operator of Record log, in accordance with Ohio Administrative Code 3745 – 7 – 09, "Recordkeeping requirements and responsibilities of a certified operator", will need to be developed for the plant.

Waste Activated Sludge is hauled to the City of Urbana on a weekly basis. Currently the sludge tank aeration system is activated prior to hauling. In order to ensure that the tank is maintained in an aerobic state, the aeration system should be run on a regular basis.

A review of the Electronic Discharge Monitoring Reports (EDMR's) from April, 2007 through August, 2010 has revealed the following violations: **Frequency** – Temperature (3), flow (1), Color (3), Odor (3), Turbidity (3); **Code Violations** – Dissolved Oxygen (2); **Final Effluent Limitations Violation** – Ammonia (4), and Dissolved Oxygen (30).



Facility Inspection

All of the influent flow is pumped to the treatment system. The lift station has two pumps and is alarmed to notify staff when the second pump comes on.

From the lift station flow is pumped to the equalization tank. The equalization tank has two pumps. The distribution piping returns part of the pumped flow to equalization tank to control flow rates through the treatment system.

The system has two aeration tanks. The tanks are run in parallel. The tanks were being mixed uniformly. The mixed liquor was brown. The return was chocolate brown. Individual blowers serve each of the aeration systems.

The clarifiers in both tanks had a clear zone to about three feet. A uniform sludge blanket was noted. Minor Pin floc solids were rising in the tanks. The effluent was clear with minor amount solids leaving the tanks. Old solids were noted behind the influent baffles in both tanks. These solids should be removed.

After the clarifiers flow enters the tertiary dosing tank. Two pumps (one lead and one lag) are being used to dose the tertiary sand filters.

The plant has four tertiary filters. New sand was added to all the filters last week. There were no solids or weeds on any of the filters. One filter is used at a time.

The UV disinfection system was on line. The system is a U tube system with two lights. This system is completely closed in PVC. Consideration should be given to a watt meter as a means to verify system function.

The final outfall was clear, no solids, and no foam. There were no solids in the stream channel. The final outfall sign was installed in accordance with the permit requirement.



11/11/11

Items Requiring a Response

1. Please provide an update detailing the findings of the study into establishing a back-up power source for the plant. This update must be submitted by no later than November 29, 2010.
2. Please provide a copy of the Operator of Record form as completed and sent to Ohio EPA, Central Office by no later than November 8, 2010.
3. In accordance with Ohio Revised Code 3745 – 7 – 09, "Recordkeeping requirements and responsibilities of a certified operator", an Operator of Record log book will need to be developed for the plant. Written verification as to the implementation of the operator's log must be submitted to this office by no later than November 8, 2010.

