



Environmental
Protection Agency

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



1PK0001320110628

CLARK

SOUTHWEST WWTP

LEIBFRITZ, SANDRA 2011/06/28



Environmental
Protection Agency

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

June 28, 2011

Clark County Board of Commissioners
50 E. Columbia Street
Springfield, OH 45502

CERTIFIED LETTER

**RE: Clark County Southwest Regional WWTP, Clark County
Compliance Evaluation Inspection
NPDES No. 1PK00013*JD/OH0049794**

Dear Commissioners:

On June 21, 2011, Sandra Leibfritz conducted an inspection at Southwest Regional WWTP located at 3990 Woodbury Road, Medway, Ohio. Jeff Blair and Chuck Bauer were representing the facility. A Performance Audit Inspection was also performed by Ohio EPA's Division of Environmental Service. This section of the inspection will be sent to you under separate cover letter. All areas that were evaluated were rated as satisfactory. Southwest Regional WWTP's inspection report for the facility is enclosed.

There are two items requiring a response. We ask for a response no later than July 15, 2011. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Clark County Health Department
jbair@clarkcountyohio.gov
cbauer@clarkcountyohio.gov
agodsey@clarkcountyohio.gov



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OEPA SWDO *Sandy Leibfritz*
MARTYN BURT/DEBORA ROTH DSW
401 E FIFTH STREET
DAYTON OH 45402 2911





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
1PK00013*KD	OH0049794	06/21/2011	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Clark County Southwest Regional WWTP 3990 Woodbury Road Medway, OH 45323	9:00 a.m.	March 1, 2011
	Exit Time	Permit Expiration Date
	12:30 p.m.	July 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jeff Blair, Utilities Superintendent & Operator of Record Clark County Department of Utilities Springview Government Center 3130 E. Main Street Springfield, OH 45505	(937) 849-0507 (937) 605-2032 (cell)	
Name, Address and Title of Responsible Official	Phone Number	
Clark County Board of Commissioners 50 E. Columbia Street Springfield, OH 45502	(937) 328-2405	
Alice Godsey, Director of Utilities Clark County Department of Utilities Springview Government Center 3130 E. Main Street Springfield, OH 45505	(937) 521-2158 (Alice Godsey) (937) 521-2155 (Charles Bauer)	

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	**	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S/N	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
**PAI conducted by Ohio EPA Division of Environmental Services	
See attached report.	
Inspector	Reviewer
<i>Sandra Leibfritz</i> 6/28/2011 Sandra D. Leibfritz Division of Surface Water Southwest District Office	<i>Martyn Burt</i> 6/29/11 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
 in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

- The WWTP consists of influent pumping, (2) screw pumps, coarse bar screen (on bypass over 5 MGD), automatic screen, aerated grit, influent parshall flume, (3) oxidation ditches, splitter box, (2) secondary clarifiers, (2) tertiary screw pumps, (4) tertiary sand filters, chlorination/dechlorination with post aeration and effluent parshall flume.
- Southwest Regional WWTP was issued a renewal permit that became effective on March 1, 2011.
- The design flow of the WWTP is 2.0 MGD. The NPDES permit has a construction schedule for expanding the WWTP from 2.0 to 4.0 MGD. The County has completed the stress testing their clarifiers in an attempt to rerate each clarifier to 1.6 MGD. Results were sent to Brown & Caldwell for analysis and a final report will be sent to this office by September 2011.
- During the period from January 2009 through December 2009, the average flow was 1.34 MGD.
- Southwest Regional WWTP was issued a PTI (No. 811764) for upgrades to a solids handling facility on June 15, 2011.
- An oxidation ditch pump and a back wash pump (tertiary filters) is out-of-service, but they are scheduled for repair.
- The County has a 6-inch trash pump.

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... N/A
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in: NPDES No. 1PK00013*JD
- (f) Permittee is meeting compliance schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

- During the period from September 2010 through May 2011, there were four reported final effluent violations. In December 2010 and February 2011, there was one dissolved oxygen violation in each month. In May 2011, there was one oil/grease and one chlorine violation. SW Regional WWTP does provide Noncompliance Notification for all effluent violations.
- The latest biomonitoring report is Ohio EPA's Bioassay Report (No. 09-387-SW) dated April 6, 2009. This report indicates that effluents were not acutely toxic to either *P. promelas* or *C. dubia* for outfall 001. Biomonitoring will be conducted by Test America.

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.....

The generator operates all equipment except the screw pumps to the tertiary sand filters and post aeration.

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

The generator is automatically placed under load every Tuesday for ½ hour. The generator did kick on and off during the inspection. The operator was notified via phone that the generator did kick on. The County passed DPL's load test. During peak demand, DPL can require the County to run their WWTP by generator for a maximum of 4 hours. The load test is conducted yearly by DPL.

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

The alarm system is capable of handling 32 different situations. Currently, the system is utilized for high water levels in the lift stations, secondary clarifier, bar screen, grit blowers, digesters and etc.

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

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc).....

Calendar

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

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... Y

(h) Any plant upsets since last inspection..... N

Comments/Status:

- There are 2 influent screw pumps and another channel to allow for expansion. There are two major lift stations that discharge to the wet well. Park Layne feeds from the bottom and Mud Run feeds from the top. The screw pumps are manually alternated on a monthly to quarterly basis. Rags/debris from the bar screen are disposed of at a solid waste landfill (i.e., Waste Management).
- Both grit chambers are operable. One is off-line due to low flows. Screenings are disposed of at a solid waste landfill (i.e., waste management). The weirs in the grit chamber are corroded.
-The County is evaluating how to use the old primary clarifiers.
- The SVI is 150, but the County goal is a SVI of 100-120. The MLSS is 4,000 mg/l. The WAS has been increased from 16,000 to 40,000 gpd to lower the MLSS to 2,500-3,000 mg/l.
- The County is using the inner and middle ditch for oxidation and the outer ring for WAS. The MLSS was extremely dark in color.
Both clarifiers are on-line. The sludge blanket is ~1.5 feet, but the target is less than a foot..
- All tertiary filters were operational. Flows in excess of 3.0 MG bypass the tertiary building and recombined with the final effluent prior to discharge.
- The effluent in the final channel of the chlorine contact tank was very clear. Approximately 80% of the chlorine is added at the tertiary screw pumps and the remaining 20% is added at the head of the tank.

Section G: Operation & Maintenance (con't)

Record Keeping:

- (a) Wastewater Treatment Works classification (OAC 3745-7) III
- (b) Operator of Record holds an unexpired license of class required by permit..... Y
- (c) Copy of certificate of Operator of Record on display on-site Y
- (d) Has the Operator of Record submitted an ORC Notification Form..... Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7) Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... Y
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (i.e. computer log, hard bound book)

-The maintenance log is kept on a spiral bound premade calendar (this will be converted to hard bound book). The task and initials of the operator performing the task are noted in the calendar.
 - Alice Godsey, Chuck Bauer and Jeff Blair are the operator. All have their Class III license. A premade calendar to note his time spent at the WWTP.
 - On March 9, 2010, the Director approved a staffing reduction of 10 hours for the plant
- (i) Log book(s) kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - 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)... N
 - V. Identification of person making log entries..... Y
- (e) 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

Comments/Status:

- There are three Class III licensed operators (Alice Godsey, Chuck Bauer and Jeff Blair), two Class II licensed operator (Scout Lough and Warren Crew) and two Class I licensed operators (Kenny Oster and Harmon Queen).
 - Bench sheets are kept in the laboratory.

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 15
 - How many pump stations have telemetered alarms..... 15
 - How many pump stations have operable alarms..... 15
- (b) Any collection system overflows since last inspection..... N
 (CSO and/or SSO)
- (c) Regulatory agency notified of all overflows..... N/A
- (d) Are there CSOs in the collection system..... N
 - i. if so, what is the LTCP status.....

N/A
 - ii. if so, how are CSOs monitored (chalk, block, level sensor, etc.).....

N/A
- (e) Portable pumps available for collection system maintenance..... Y
- (f) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... Y
- (g) Any WIB complaint received since last inspection..... Y
- (h) Is there a WIB response plan..... Y
- (i) Is any portion of the collection system at or near dry weather capacity..... Y

Comments/Status:

- Dave Hasting is responsible for the collection system. Mr. Hastings has a Class II Collection System license. Mr. Hastings phone number is 937.605.1324 and he reports to Jeff Blair.

- There were no reported SSOs in 2008 or 2009. There were 3 reported WIB in 2009. All were due to blockage in line.

- There are 4 satellite collection systems (Garden Acres, Northridge, Limecrest and Maplewood). SW Regional also. There are 6 lift stations in the satellite collection systems as follows: one in Garden Acres, three in Northridge, two in Limecrest. These will be equipped by with Mission Communication (telecommunications by the end of 2011. This system records and reports high flow, volume, run times, etc. There is also a private lift station (no dialer) to Emro Marketing. There is permanent standby power for Garden Acres. The remaining three have portable standby power. All lift stations are equipped with audio/red light alarm systems and all were reported as operational. All pumps were reported as operational. SW Regional also maintains Donnelville sanitary sewer collection system.

- There are a total of 15 lift stations in SW Regional's sanitary sewer collection system. Three of the four major lift stations have permanent power. Mud Run has an alternate power source (2 feeds).

- All of the lift stations are on dialers.

- The County has 5 portable pumps (one 6-inch, three 3-inch and 1 2-inch pumps) and 2 portable generators to relieve the remaining lift stations.

- Garden Acres (satellite collection system) is near capacity. This area is built out. The I/I reduction work on the collection has greatly improved complaints. There were no reported complaints of sewer in basement since repairs have been made.

- By middle of 2012, the County will be contracting with Miami County for 40,000 to 80,000 gpd from Phoneton & Brandt.

Section H: Sludge Management - Class B Sewage Sludge (monitoring station 581)

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

Pathogen Reduction Alternative	Vector Attraction Reduction Options (84370)									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 -- Aerobic Bench Scale Analysis	Option 4 -- Specific Oxygen Uptake Rate	Option 5 -- Aerobic Time and Temperature	Option 6 -- Alkali Addition	Option 7 -- >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids	Option 9 -- Land Injection	Option 10 -- Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Has amount of sludge generated changed significantly since the last inspection..... N

(c) How much sludge storage is provided at the plant.....

There is 120 days for 2.0 MGD as operations currently exist. When the WWTP upgrades to include an on-site screw press with higher percent solids for a 4.0 MGD, there will be 80 days storage with a contract to haul to a landfill for the remaining days.

(d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y

(e) Any complaints received in last year regarding sludge..... N

(f) 5/8" screen at headworks for facilities that land apply sludge..... Y

(g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/E

(h) Is a contractor used for sludge disposal..... Y

If so, what is the name of the contractor **Synagro**

Section H: Sludge Management - Con't

Comments/Status:

- The County cut open and land applied sludge from their two geotubes. The County was issued a PTI for installing a new screw press. They will no longer use geotubes.
- Synagro comes out every 6 to 8 weeks to remove sludge from the digesters.
- Sludge generated from WWTP as follows: 2008 110.11 dry tons, 2009 - 129.27 dry tons and 2010 - 172.69
- The diffusers and decanter mechanism in digesters 1 and 2 are not working efficiently.
-The County's contract with Synagro for sludge disposal (land application) is over this year. The County renewed their contract with Synagro for the next 3 years.

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
- (b) Flow meter calibration annually..... Y
(Date of last calibration: **May 24, 2011**)
- (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:

- The final effluent flow meter is used to report flows on the DMRs. This flow meter is located after the chlorine contact tank. Even though the meter has been calibrated and is checked on a daily basis, there are maintenance issues. SW Regional uses the influent meter to check and report flow. There are plans to purchase a new effluent meter by the end of summer 2011.

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..... N/E
- (d) Sample collection procedures are adequate.....
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... N/E
 - (iii) Containers and sample holding times prior to analysis
conform with 40 CFR 136.3..... N/E

Section I: Self-Monitoring Program (con't)

- (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.. N/E

Comments/Status:

- The influent sample is collected after the screw pumps, but before the screens.
- The effluent sample is collected after the tertiary building, but prior to the chlorine contact tank. The thermometer in the refrigerator for the composite sampler was at 4°C.
- The upstream sample is collected at the bridge located on Spangler Road.
- The downstream sample is collected at the bridge where the Mad River crosses Osborn Road.

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N/E
- (b) Do SOP's include the following if applicable..... N/E
 - Title
 - Procedure
 - Scope and Application
 - Calculations
 - Summary
 - Quality Control
 - Sample Handling and Preservation
 - Maintenance
 - Interferences
 - Corrective Action
 - Apparatus and Materials
 - Reference (Parent Method)
 - Reagents

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 know 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).. N/E
 - (d) If alternate analytical procedures are used, proper approval has been obtained..... N/E
 - (e) Analyses being performed more frequently than required by permit. N
 - (f) If (c) is yes, are results in permittee's self-monitoring report..... N/A
 - (g) Satisfactory calibration and maintenance of instruments/equipment N/E
 - (h) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab:

Lab name: Test America - oil/grease, metals, cyanide, nitrite/nitrate, CBOD₅, phosphorus, aldrin, heptachlor expoxide, hexachlorbenzene and lindane.
 Lab name: Pace Analytical – dioxon.
 Lab name: Genisco – mercury.
 Lab name: SW Regional WWTP – TSS, NH₃, pH, DO, Fecals, chlorine and temperature.

Section I: Self-Monitoring Program (con't)

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N/E
 Date: **July 21, 2010** (date of report)
- (b) Were any parameters "Unsatisfactory"..... N/E
- (c) Reasons for "Unsatisfactory" parameters.....

N/A

Comments/Status:

A Performance Audit Inspection was conducted by Ohio EPA's Division of Environmental Service. Inspection results will be sent under a separate letter.

Section J: Effluent/Receiving Water Observations

Receiving Stream: Mad River
 Receiving Stream Description:

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	White	None	Clear	None

Comments/Status:

- The final effluent was very clear. There was no odor emanating from the effluent. The receiving stream, both upstream and downstream of the outfall, were similar in appearance.
- The discharge was nonturbulent and shore hugging.

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:

FINAL EFFLUENT VIOLATIONS – OUTFALL 001*

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	Dissolved Oxygen	1D Conc	5.5	5.34	12/27/2010
February 2011	Dissolved Oxygen	1D Conc	5.5	4.98	2/2/2011
May 2011	Oil and Grease, Hexane	1D Conc	10.	23.8	5/2/2011
May 2011	Chlorine, Total Residual	1D Conc	0.038	.07	5/3/2011

* During the period from September 2010 through May 2011- noncompliance notification given.

Areas Requiring a Response

1. Solids were observed on the side walls and on the outside of the sludge drying beds. This is similar to the observations made during the last inspection (September 2010). Southwest Regional WWTP must implement best management practices (BMP), such as inspecting the area and sweeping the pavement periodically to remove the solids for proper disposal, especially after dewatering loading and unloading events. No later than July 15, 2011, please inform this office in writing, a description of the actions taken or proposed for your BMP. Your response should include dates, either actual or proposed, for completion of the actions.
2. According to SW Regional's Annual Sewage Sludge Report, the process to significantly reduce pathogens is air drying (Alternative 2). No later than July 15, 2011, provide sludge records that demonstrate Ohio Administrative Code 3745-40-05(O)(2)(b) (i.e., air drying) has been met from June 2010 through June 2011. This records request includes the date of sludge placement on sand beds for air drying and the ambient daily temperature.