



Environmental
Protection Agency

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



1PC0000520091014

CLERMONT MILFORD STP

ZIMMERMAN, MICH 2009/10/14



State of Ohio Environmental Protection Agency

Southwest District Office

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

October 14, 2009

Ms. Loretta Rokey
City of Milford
745 Center Street, Suite 200
Milford, Ohio 45150

**Re: Milford WWTP
NPDES Permit No. 1PC00005*GD; OH0020451
NPDES Compliance Inspection and Notice of Violation**

Dear Ms. Rokey:

On September 23, 2009, I conducted an unscheduled NPDES (National Pollutant Discharge Elimination System) permit compliance inspection at the above referenced facility. Carol Royer, Plant Supervisor, and David Walker, Plant Operator, were present at the treatment plant during the inspection. The purpose of the inspection was to evaluate the operation of the wastewater treatment system and to determine compliance with the NPDES permit.

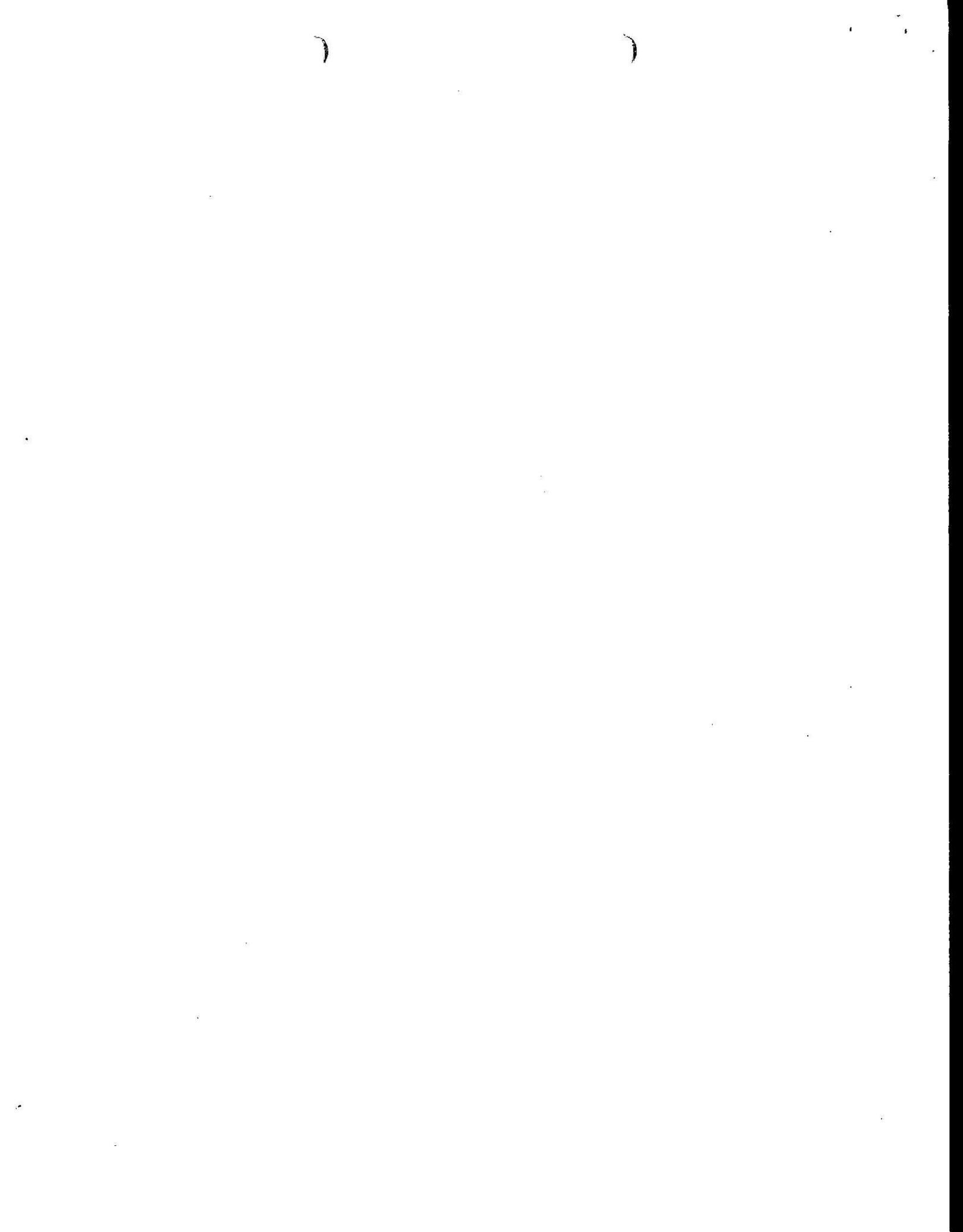
All review areas evaluated during the inspection were rated satisfactory (refer to Section D of the attached report). However, review of the monthly electronic Discharge Monitoring Reports submitted by the City from March, 2007 through August, 2009 revealed weekly and monthly TSS and NH₃-N concentration and loading violations for the final effluent in February, 2009 (listed in the attached report). These violations were previously reported to the Ohio EPA as required by the NPDES permit. No further information is needed at this time.

If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,

Michael W. Zimmerman
Permits Group
Division of Surface Water

Copy: Carol Royer, City of Milford



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:

Refer to notes.

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:

Refer to notes.

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)..... III
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (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..... 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..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Refer to notes.
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) 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)... 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..... N
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... Y
- (e) CSOs monitored and reported in accordance with permit..... Y
- (f) Portable pumps used to relieve system..... Y
- (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 N
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

Refer to notes.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: **11/07/88** Approval #: **05-210** Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method: *Landfilled*)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name: *hauler – Utter Construction; landfill – Rumpke Brown Co.*)
- (f) Has amount of sludge generated changed significantly since last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... N/A
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Approximately 20,000 gals of digested sludge filter pressed on September 17th

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: *approx. one year ago*)
- (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:

Effluent flow meter – Siemens – flow reading at 11:00 am was 0.774 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..... Y
- (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, including low-level Hg, hexavalent Cr**
Lab name:

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

DMR-QA study done through the Clermont County Lab

Comments/Status:

Section J: Effluent/Receiving Water Observations

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

Comments/Status:

Refer to notes.

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..... Y
- (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:

Additional observations and notes:

Section E: Permit Verification

(f) The last compliance inspection was conducted on March 15, 2007. Improvements to the WWTP had just been completed.

Section F: Compliance

(a)

**Milford WWTP Numeric Limitation Violations – Outfall 001
 Review Period – March, 2007 through September, 2009**

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2009	001	Total Suspended Solids	30D Conc	18.8	20.2083	2/1/2009
February 2009	001	Total Suspended Solids	7D Conc	28.1	32.6666	2/8/2009
February 2009	001	Total Suspended Solids	7D Qty	128	137.929	2/8/2009
February 2009	001	Nitrogen, Ammonia (NH3)	7D Conc	14	14.9333	2/15/2009

(c) Last CSO contained in permit compliance schedule was eliminated in the summer, 2009.

Section G:

Treatment Works:

Units in operation: 2 of the 3 oxidation ditches were operating; only using the newer larger clarifier (2 older ones off-line)

(d) Plant personnel:

- Carol Royer, Plant Supervisor – Class III
- David Walker, Operator 1 – Class III
- Art Keith, Operator 2 – Class III
- Peter Wendel, Operator 3 – unlicensed
- Roger Asbury, Operator 4 – maintenance

Record Keeping:

(b) Permanently bound log books are maintained for everything they do at the WWTP. Bound log books are also maintained for calibration of lab equipment.

Collection System:

(f) Portable pumps are available if needed at the lift stations. The city also has a contract with a company to lease portable pumps.

(g) The system has 7 lift stations, all telemetered and connected to SCADA.

Section I: Self-Monitoring Program

Upstream and downstream samples are collected and brought back to the WWTP lab for pH and D.O. (YSI Model 52) analyses. The meters are calibrated

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each day of use. TSS is also analyzed at the WWTP lab. The TSS drying oven temperature was 104° C. The metric balance was calibrated on August 7, 2009. All other parameters are transported to the Clermont Co. Lab or their contract lab (metals) for analysis.

Section J: Effluent/Receiving Water Observations

The final effluent enters an 18-inch concrete pipe and flows approximately 800 feet through a nature preserve to the Little Miami River (concrete headwall on the right bank).

