



State of Ohio Environmental Protection Agency

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MIAMI

NAWA WTP

MILLER, JOSEPH

2008/09/26

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

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State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Laura Powell, Acting Director

September 26, 2008

Northern Area Water Association  
P.O. Box 145  
Tipp City, OH 45371

**RE: Compliance Evaluation Inspection (CEI)  
NOTICE OF VIOLATION  
Northern Area Water Association (NAWA) Wastewater Treatment  
525 South First Street, Tipp City, Miami County  
NPDES 11Z00122\*AD/OH0134147**

Ladies and Gentlemen:

On September 18, 2008, I conducted a Compliance Evaluation Inspection at the NAWA wastewater treatment works. This inspection was conducted to determine compliance with NPDES permit 11Z00122\*AD. Lisa Hendricks and Scott Sheppard, certified wastewater operators, represented NAWA during this inspection.

Overall the wastewater facility was rated as "Satisfactory" with one area rated as "Marginal". A detailed inspection report is attached.

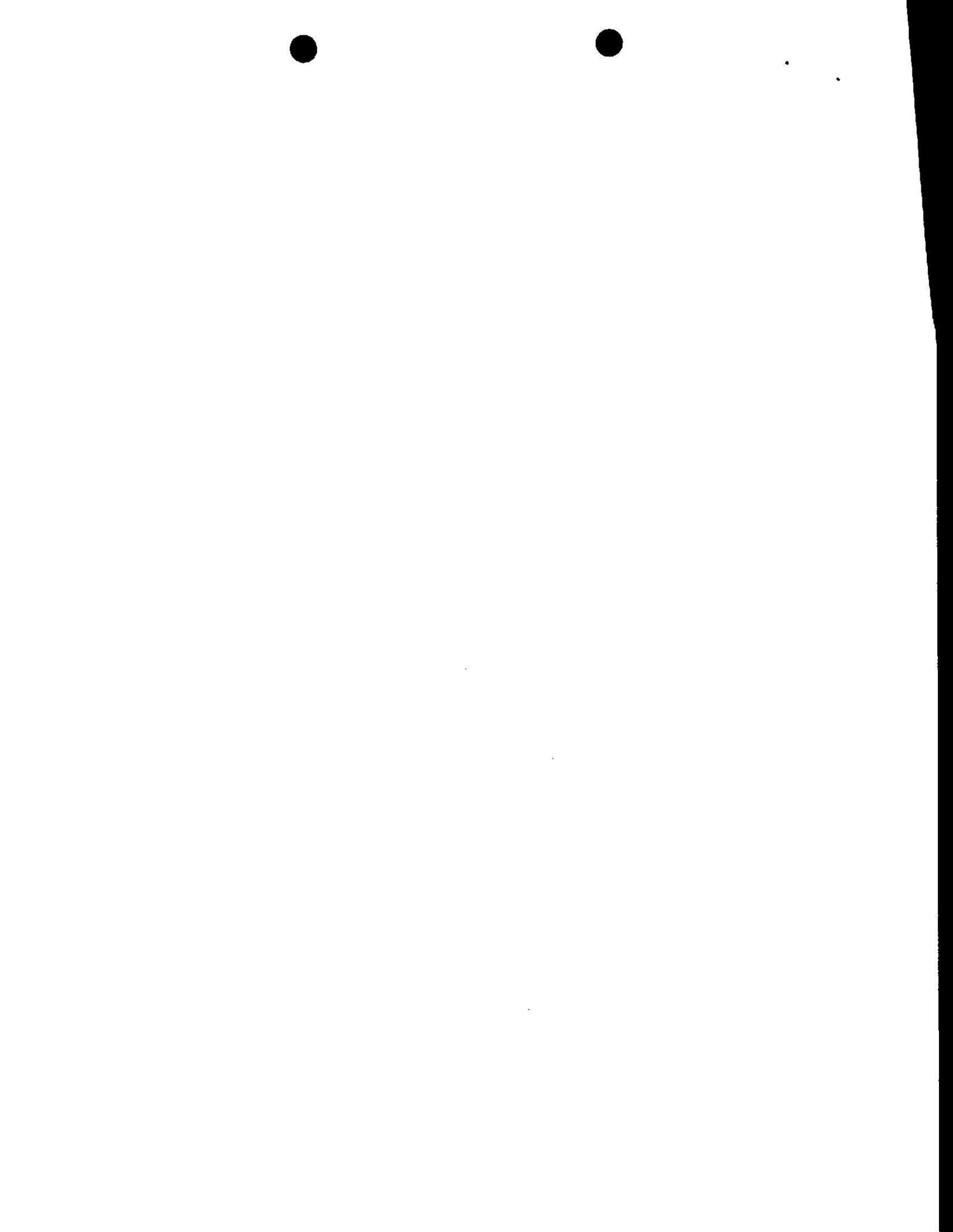
A response to this inspection is requested by October 17, 2008. In your response, provide a detailed explanation for the frequency violations noted, as well as actions proposed to prevent future violations. If you have any questions, I can be reached at (937) 285-6109.

Sincerely,

Joe Miller  
Division of Surface Water

CC: Steve Nickels, Vandalia Water/Wastewater Superintendent  
Milton Eichman, Tipp City Utilities Service Director





**NAWA NPDES 11Z00122**  
**Compliance Evaluation Investigation (CEI)**  
**September 18, 2008**

**Overview**

The Northern Area Water Association (NAWA) treatment plant provides drinking water to the municipalities of Vandalia and Tipp City. Drinking water is treated using nanofiltration membranes. Membrane concentrate is aerated and discharged to the Great Miami River. Filter backwash water is settled and the decanted water is discharged with the membrane concentrate. Settled solids are discharged to Tipp City's sanitary sewer, which ultimately is treated at the Tri-Cities North Regional Treatment Plant.

The NAWA facility began discharging wastewater to the Great Miami River in January 2007. Since this time, the facility has averaged a discharge of 588,000 gallons per day. The parameters analyzed as part of the NPDES permit are: dissolved oxygen, pH, total dissolved solids, total suspended solids, phosphorus, chloride, sulfate, total recoverable barium, suspended iron, and suspended manganese. Since the inception of discharge there have been two effluent limitation violations noted. Monthly and weekly suspended iron (Fe) concentration limitations were exceeded in March 2008. In the self-notification letter provided by Lisa Hendricks, these violations were attributed to the inability to discharge residuals to the Tipp City sanitary sewer due to overflow conditions resulting from infiltration and inflow. As a result, levels of suspended iron in the direct discharge became elevated.

Numerous frequency violations (>300) were noted during the period of January 2007 to October 2007. The majority of these violations were due to not reporting temperature under reporting code 011, as required in the NDPEs permit. Frequency violations noted (other than temperature) from the period of February 2007 to October 2007 are listed below:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
February 2007	001	00400	pH	1/Week	1	0	02/15/2007
February 2007	001	00300	Dissolved Oxygen	1/Week	1	0	02/15/2007
February 2007	001	00515	Residue, Total Dissolved	1/Week	1	0	02/15/2007
March 2007	001	00400	pH	1/Week	1	0	03/22/2007
March 2007	001	00300	Dissolved Oxygen	1/Week	1	0	03/22/2007
March 2007	001	00515	Residue, Total Dissolved	1/Week	1	0	03/22/2007
June 2007	001	00400	pH	1/Week	1	0	06/15/2007
June 2007	001	01044	Iron, Suspended (Fe)	1/2Weeks	1	0	06/15/2007
June 2007	001	01054	Manganese, Suspended	1/2Weeks	1	0	06/15/2007
June 2007	001	00300	Dissolved Oxygen	1/Week	1	0	06/15/2007
June 2007	001	00515	Residue, Total Dissolved	1/Week	1	0	06/15/2007
November 2007	001	00300	Dissolved Oxygen	1/Week	1	0	11/01/2007

Permit #: 11Z00122\*AD  
 NPDES #: OH0134147



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
11Z00122*AD	OH0134147	9/18/08	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Northern Area Water Association 525 South First Street Tipp City, OH 45371	9:30 AM	3/1/2005
	Exit Time	Permit Expiration Date
	11:30 AM	2/28/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Lisa Hendricks, Water Treatment Plant Supervisor Scott Sheppard, Water/Wastewater Superintendent	937-506-3200 937-506-3200	
Name, Address and Title of Responsible Official	Phone Number	
Northern Area Water Association P.O. Box 145 Tipp City, OH 45371	937-506-3200	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Self-Monitoring rated as "Marginal" due to effluent frequency violations.	
Inspector	Reviewer
 Date: 9/26/08	 Date: 9/29/08
Joe Miller Division of Surface Water Southwest District Office	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

**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..... NA
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... Y
- (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:

**Effluent Violations**

- (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..... NA

Comments/Status:

Iron concentration violations in March 2008 due to inability to discharge residuals to Tipp City collection system. Operator provided non-compliance notification as required. Frequency violations noted.

**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..... Y  
 Class: (Scott Sheppard, WW2; Lisa Hendricks, WW1)
- (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..... N
- (j) Regulatory agency notified of bypasses..... NA  
 On MORs  and/or Spill Hotline (1-800-282-9378)
- (k) 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)  

Hardbound log book
- (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)... Bench
  - 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

**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: Pressure transducer)
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration: 2008 (2/year))
- (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

**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. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: TP, Cl, Ba, TDS, Fe, Mn, SO4  
Lab name: Belmonte Laboratories

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y

Permit # : 11Z00122\*AD  
NPDES #: OH0134147

- (h) Adequate records maintained..... Y  
(i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory  
Date:

**Comments/Status:**

**Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	no	no	no	no	no	clear	

**Comments/Status:**