



State of Ohio Environmental Protection Agency

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1PD0000820110805

MIAMI

PIQUA WWTP

MILLER, JOSEPH

2011/08/05

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



**Environmental
Protection Agency**

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

August 5, 2011

Mayor and Council
City of Piqua
201 West Water Street
Piqua, OH 45356

**RE: Compliance Evaluation Investigation (CEI)
City of Piqua Wastewater Treatment Plant
NPDES Permit 1PD00008*RD/OH0027049
Piqua, Miami County**

Mayor and Council:

On July 12, 2011, I conducted a Compliance Evaluation Investigation at the City of Piqua wastewater treatment works. Dave Davis, WWTP Superintendent, represented the City during this inspection. I also reviewed laboratory procedures with Tim Parker, Lab Technician, and the collection system with Todd Brandenburg, Underground Utilities Superintendent.

Overall, the facility was rated as "Satisfactory", with one item rated as "Marginal". Also, the collection system was rated as "Unsatisfactory" due to Sanitary Sewer Overflows. Additional information is provided in the attached detailed inspection report.

A response is requested to this inspection. Please provide the requested information by September 9, 2011. If you have any questions, I can be reached at (937) 285-6109 or by email at joe.miller@epa.state.oh.us.

Sincerely,

Joe Miller
Division of Surface Water

CC: Dave Davis, City of Piqua
Dave Burtner, City of Piqua



**City of Piqua WWTP Compliance Evaluation Inspection
July 12, 2011**

OVERVIEW

The City of Piqua wastewater treatment works is designed to treat an average daily design flow (ADDF) of 4.5 MGD. Recent average daily flows are approaching the plant design flow: 4.11 MGD (2006), 4.11 MGD (2007), 4.34 MGD (2008), 3.46 MGD (2009), 3.56 MGD (2010), and 5.29 MGD (January 2011 through June 2011). Discharge from the Piqua WWTP is to the Great Miami River (GMR) on the south side of the City of Piqua from outfall 001 below the former power plant low head dam.

The Piqua WWTP treatment train is: raw influent screw pumps, bar screening, grit removal, scum removal, preaeration, primary clarification (3), partitioned activated sludge aeration (4) w/ anoxic zones, final clarification (4), chlorine gas disinfection, sulfur dioxide dechlorination, post aeration, and outfall pumping. Solids handling is: anaerobic digestion, mechanical dewatering with a sludge press, and land application at agronomic rates (Burch Hydro). Mixed liquor suspended solids are maintained between 1200 to 1500 mg/l. Sludge retention time is estimated to be 8 days. The waste hydraulic tank sends about 2-3% of solids to the sludge digesters. During normal operation, 2 of the three primary clarifiers are online. The third primary clarifier is put online when flows exceed 5 MGD. The aeration units have six cells each. The first and sixth cells are anoxic while cells two through five are aerated. During summer low flow conditions, one of the four aeration tanks is taken out of service when possible. Aeration is provided by fine bubble diffusers.

Influent flows to the Piqua WWTP enter via a 42" on the east side of the GMR and a 36" on the west side of the GMR. When influent flows reach about 7.5 MGD during storm events, the flow is throttled by lowering a gate on the 42" influent line. Much more than this volume results in the malfunction of the screw pumps resulting in back-flushing. When the inline storage of the influent line is exceeded, the equalization tank begins to fill. When the equalization tank water level reaches about 13 feet, the sanitary sewer overflow occurs. The equalization tank was completed in early 2010. The 36" interceptor lining and repair project is nearing completion.

Process control testing on the wastewater treatment components includes monitoring dissolved oxygen levels in aeration cells, monitoring nitrogen-ammonia levels, settleability, mixed liquor suspended solids, pH levels, sludge age, and occasional microscopic analysis.

Upstream samples are taken at the Main Street Bridge and downstream samples are taken at the Farrington Road Bridge.

Schedule(s) of Compliance

NPDES permit 1PD00008*RD, effective August 1, 2011, includes compliance schedules for elimination of sanitary sewer overflows, meeting effluent limitations for nitrogen-ammonia and *Escherichia coliform*, and an evaluation of the adequacy of local industrial limitations.



Sludge Handling

Primary and waste activated sludge is directed to two anaerobic digesters. The primary digester is heated and the secondary digester is unheated. Sewage sludge is sent to a 550,000 gallon holding tank prior to processing by a belt-press filter for land application. A 75,000 gallon tank is available for additional capacity. Burch Hydro is contracted for the operation of the belt filter press and land application of sewage sludge. Approved land application sites are located in various parts of Miami County.

Pathogen reduction requirements for land application are met through anaerobic digestion of the sewage sludge. Vector reduction requirements for land application are met through volatile solids reduction.

Sanitary Sewer Overflows

The addition of the equalization tank is believed to have prevented a number of sanitary sewer overflows during the past year. A number of storms, however, exceeded the capacity of the equalization tank. The following SSOs occurred from June 2010 to June 2011:

June 14, 2010 to June 15, 2010 estimated volume 0.646 Million Gallons
June 15, 2010 to June 16, 2010 (2 days) estimated volume 5.12 Million Gallons
February 28, 2011 estimated 0.18 Million Gallons
February 28, 2011 to March 13, 2011 (14 days) estimated volume 26.1 Million Gallons
April 4, 2011 to April 6, 2011 (3 days) estimated volume 3.03 Million Gallons
April 20, 2011 estimated 0.78 Million Gallons
April 20, 2011 to May 11, 2011 (20 days) estimated volume 26.5 Million Gallons

Effluent Violation

One effluent violation was reported on the self-monitoring reports (eDMRs) during the period of review (June 2010 to June 2011). The effluent minimum concentration of dissolved oxygen was not met on May 31, 2011. A 4.42 mg/l dissolved oxygen value was reported on this day, below the 5.0 mg/l minimum requirement. Non-compliance notification was not provided as per Part III, Item 12 of the NPDES permit. Any future incidences of non-compliance need to be reported in the manner described. At the time of inspection, Dave Davis explained that the suspected reason for the violation was that when switching to the gas driven engine on the blowers there was some difficulty getting the engine started. No further explanation is necessary; however, measures should be taken to avoid this situation in the future.

ITEM REQUIRING A RESPONSE

Collection System Update – Provide a short report detailing collection system improvements during the last year and projects planned for the upcoming year.





Figure 1. Piqua EQ, JGM 7/12/11



Figure 2. Piqua WWTP - Aeration, JGM 7/12/11



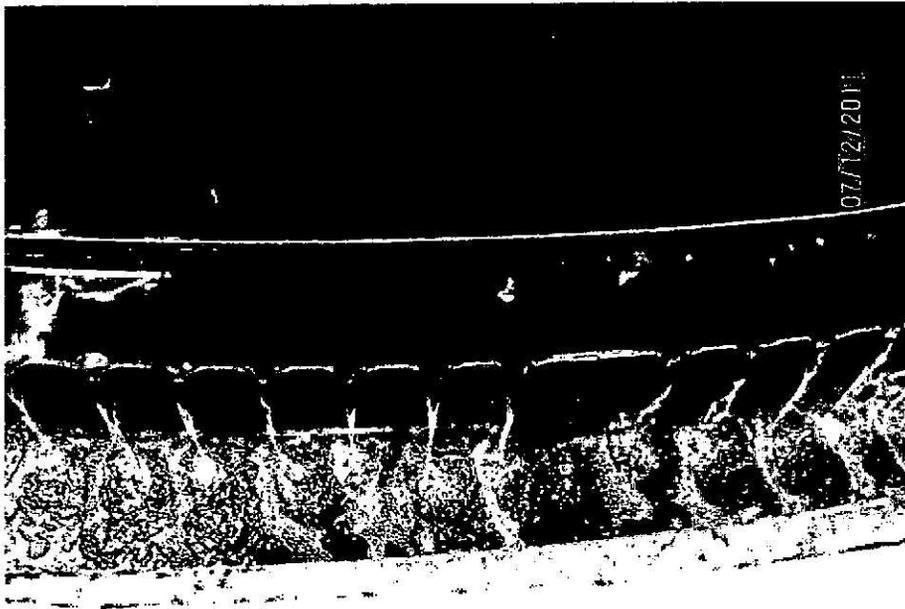


Figure 3. Piqua WWTP - Clarifier overflow weir, JGM 7/12/11

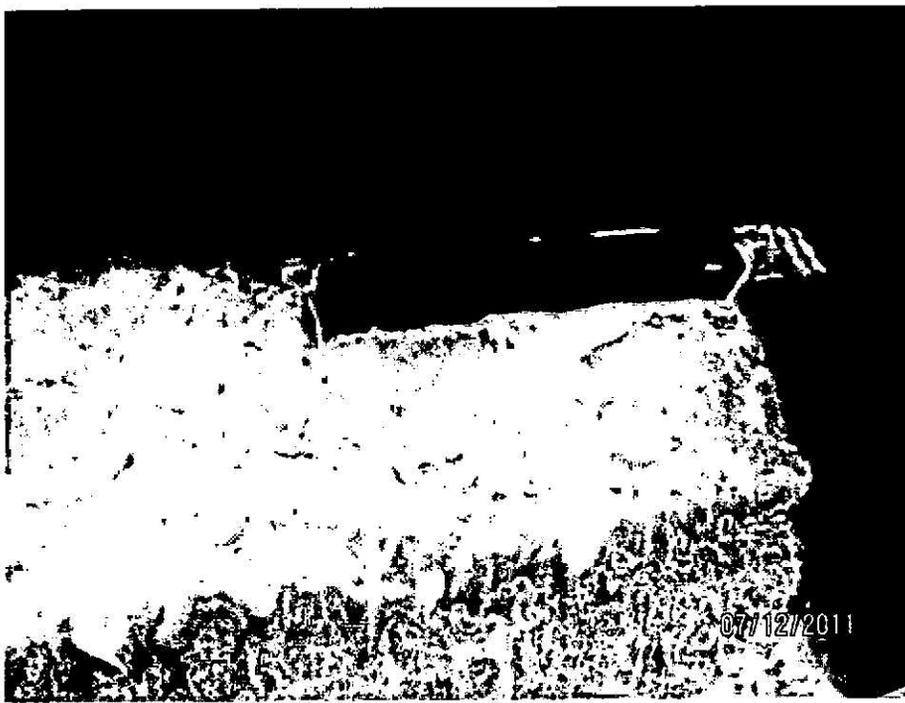


Figure 4. Piqua WWTP post aeration, JGM 7/12/11



Permit #: 1PD00008*RL
 NPDES #: OH0027049



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
1PD00008*RD	OH0027049	7/12/2011	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Piqua WWTP 121 Bridge Street Piqua, OH 45356	9:25 AM	8/1/2011
	Exit Time	Permit Expiration Date
	2:05 PM	1/31/2016
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Dave Davis, Wastewater Superintendent		937-778-2088
Tim Parker, Laboratory Technician		937-778-2088
Todd Brandenburg, Underground Utilities Supervisor		937-778-2088
Name, Address and Title of Responsible Official		Phone Number
Mayor and Council City of Piqua 201 West Water Street Piqua, OH 45356		937-778-2072

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	M	Flow Measurement	S	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	S	Other
U	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Flow measurement was rated as "Marginal" since actual effluent flow is not measured.	
Collection System was rated as "Unsatisfactory" due to Sanitary Sewer Overflows.	
Inspector	Reviewer
 Joe Miller Division of Surface Water Southwest District Office Date: 8/5/11	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 8/5/11

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:

Outfall 005 has been eliminated (above low head dam). All discharge flow is through Outfall 001 (below low head dam).

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES Permit Compliance Schedule
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Schedule of Compliance in NPDES permit 1PD00008*RD effective 8/1/11 for elimination of sanitary sewer overflows.

- Benchmarks include:
1. The submittal of a master plan by June 30, 2012
 2. Submittal of an approvable PTI for projects to eliminate the SSO by December 31, 2012
 3. Begin construction by August 31, 2013.
 4. Complete all work to eliminate SSO by January 31, 2016.
- Annual reports are to be submitted annually beginning June 2013.

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.....

Entire facility and equalization mixing pumps

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

New generator tested once so far, will test 1/QTR, SCADA
1/WK

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

All equipment alarmed through SCADA (level alarms, etc.)
Alarms alert operator on staff

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

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

(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:

Operator 10 - Antero software used for scheduling maintenance

New internal recycle mixers for nitrogen-ammonia removal being installed.

WWTP personnel maintain all equipment with the exception of diesel, screw pumps, and some electrical.

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... III
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed 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..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hard bound book - one maintained by Dave Davis, one maintained in operator's room.
- (i) Log book 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 operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... N
 - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications 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..... N

Comments/Status:

May 2011 Dissolved Oxygen effluent limitation violation not reported as per NPDES permit Part III, Item 12. Non-compliance notification needs to be provided as per Part III, Item 12.

SSO notifications provided as required.

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.....6
 - ii. How many pump stations have telemetered alarms.....0
 - iii. How many pump stations have operable alarms.....3

- (b) Any chronic collection system overflows since last inspection..... Y
- (c) Regulatory agency notified of all overflows..... Y
- (d) CSOs in the collection system....if so, what is the LCTP status..... N/A
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... Y
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... Y
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

Comments/Status:

West interceptor lining project (36") nearly complete. Minor property repairs remaining.

Flow meters removed from collection system on June 22, 2011. Flow model will be updated with this information.

Master plan to be completed in 2012 is expected to include needs for collection system and wastewater treatment facility.

Sewer project connecting the Village of Fletcher is complete, tie-ins of properties ongoing.

Section H: Sludge Management

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

*if one of the selected methods is land application, complete applicable charts.

Class A - Exception Quality Sewage Sludge (monitoring station 584)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	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
Alternative 1 - Time and Temperature Regime (84369)	<input checked="" 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 - High pH and High Temperature (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"/>
Alternative 3 - Other Processes (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"/>
Alternative 4 - Unknown Processes (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"/>
Alternative 5 - Composting (84397)	<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 5 - Heat Drying (84397)	<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 5 - Heat Treatment (84397)	<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 5 - Thermophilic Aerobic Digestion (84397)	<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 5 - Beta Ray Irradiation (84397)	<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 5 - Gamma ray Irradiation (84397)	<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 5 - Pasteurization (84397)	<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 6 - 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"/>

Class B Sewage Sludge (monitoring station 581)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	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	Option 8 - >75% Percent Solids with Unstabilized	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 type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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..... Y
- (c) How much sludge storage is provided at the plant.....
- (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..... Y
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

Comments/Status:

Sludge press processing and land application contracted with Burch Hydro. Sludge sites located throughout Miami County. Headworks improvements planned during the next construction project.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

Sparging on-pipe mag meter

- (b) Flow meter calibrated annually Y
(Date of last calibration:)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... N

Comments/Status:

Flow meter is located after screw pumps, but prior to RAS. Skimmings, plant drainage, drainage to sludge well all come in after flow meter and before RAS.

Effluent flow metering expected to be included in master plan.

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
(see GLC page)
- (d) 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

Comments/Status:

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

Laboratory:

General

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

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

Lab name: Ginosko Laboratory

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
Date:
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

See attached General Lab Criteria Checklist

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: After low head dam

Receiving Stream: Great Miami River

Receiving Stream Description: EWH

Comments/Status:

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?