



State of Ohio Environmental Protection Agency

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MONTGOME BROOKVILLE STP

SARLE, EDWARD

2008/02/07

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
Chris Korleski, Director

February 7, 2008

Mr. John Wright, City Manager
City of Brookville
301 Sycamore Street
Brookville, OH 45309

Re: Montgomery County, Brookville WWTP, Compliance Evaluation Inspection

Dear Mr. Wright:

On January 24, 2008, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0020605; OEPA Permit No. 1PC00000*GD). The inspection was also conducted as part of renewing the facility's NPDES Permit. Representing this facility was Ron Brandt, John Weist, and Joe Hamiel. A copy of my inspection report is enclosed.

The inspection report contains one marginal area. The Records / Reports section was rated marginal as a result of the failure to maintain an operator logbook, report effluent violations, report "AA" for parameters not detected, and maintain records of temperature for ensuring proper sampling and testing procedures.

The areas noted in the inspection report are being addressed. Therefore, no response is required at this time.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Ron Brandt, City of Brookville







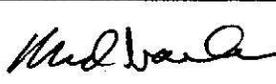
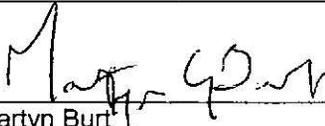
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PC00000*GD	OH0020605	1/24/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brookville WWTP 610 South Wolf Creek Pike Brookville, OH 45309	9:20 A.M.	5/1/2003
	Exit Time	Permit Expiration Date
	1:20 P.M.	4/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ron Brandt, Utilities Superintendent John Weist, WWTP Operator Joe Hamiel, WWTP Operator	(937) 833-2135 (937) 833-2515 (937) 833-2515	
Name, Address and Title of Responsible Official	Phone Number	
John Wright, City Manager 301 Sycamore Street Brookville, OH 45309	(937) 833-2135	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments	
Inspector	Reviewer
 2/7/08	 2/7/08
Ned Sarle Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



NPDES Permit #: OH0020605
OEPA Permit #: 1PC00000*GD

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:

None.

Section F: Permit Violations / Compliance Schedules

- (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..... N/A

Comments/Status:

None.



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)..... II
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: II
- (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..... Y
- (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..... N
- (b) Format of log book (i.e. computer log, hard bound book)
- (c) Log book(s) kept onsite (in an area protected from weather)..... N
- (d) Log book contains the following:
 - I. Identification of treatment works..... N
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... N
- (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..... N



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..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N
- (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 Y
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

See Attached Summary of Findings / Comments.



Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: 2/28/1992 Approval #: 05-274-PW Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method: Land Applied)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... N
(Name:)
- (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..... Y
- (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:

None.

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: 4/10/2007)
- (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..... N
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Flow monitoring equipment may measure flows between 0 and 5.0 MGD. The flow monitoring equipment is located on the WWTP influent.



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..... 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: All parameters but DO, pH, and temperature are sent out to be tested.

Lab name: Belmonte Park Laboratories and MASI

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... N/E
- (g) Satisfactory calibration and maintenance of instruments/equipment. N/E
- (h) Adequate records maintained..... N/E
- (i) Results of latest USEPA quality assurance performance sampling program:
 Satisfactory Marginal Unsatisfactory
Date:

Comments/Status:

None.



Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	-	-	-	-	-	Clear	

Comments/Status:

See Attached Summary of Findings / Comments.

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:

None.



NPDES Permit #: OH0020605
OEPA Permit #: 1PC00000*GD

Summary of Findings / Comments

A review of the Monthly Operating Reports (MORs) for January 2005 through December 2007 indicated several violations. These violations are listed on Attachments I. The City of Brookville (Brookville) failed to report these violations in accordance to the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification". Future violations must be reported as required by the NPDES Permit.

The WWTP was upgraded in 1998 and consists of a fine screen, vortex grit tank, vertical loop reactor, secondary clarifier, and UV disinfection. A backup generator is provided for the WWTP. This generator is operated under load once a week. Aerobic sludge digestion tanks are also provided. The liquid sludge is then injected at two local farms. In 2006, 36 dry tons were disposed in this manner. A SCADA system is also provided for the WWTP.

In November 2007, the shaft on one disc aerator broke. This is the second time in two years this failure has occurred.

The WWTP discharge flow rate is monitored using a parshall flume. The WWTP is designed for an average daily flow rate of 1.2 MGD and a peak daily flow rate of 5.0 MGD. A review of the MORs indicated that the average and peak flow rate for this period was reported as 0.96 MGD and 4.92 MGD.

No overflows or bypasses from the sewage collection and treatment system were reported for January 2005 through December 2007. However, the Ohio EPA is concerned that the WWTP peak flows have nearly reached the peak design flow rate while the average daily flow rate is only 80% of the designed average daily flow rate. These facts indicate that infiltration and inflow (I/I) are a problem with the sewage collection system. As more areas are added to the sewage collection system, the increased peak flows may cause NPDES Permit violations for this facility. Brookville should implement an effective sanitary sewer operation and maintenance program to control excessive I/I.

Currently, the WWTP is required to be under the supervision of a Class II operator. Ron Brandt currently has a Class II operator certificate. On December 21, 2006, the new operator certification rule became effective. This rule is contained in Ohio Administrative Code (OAC) 3745-7 and may be viewed at the following website: <http://www.epa.state.oh.us/ddagw/oac.html#374507>. OAC 3745-7-04 will require the Brookville WWTP to have a Class III WWTP operator. This requirement will not be placed in the proposed NPDES Permit renewal. However, Brookville will be required to have a Class III WWTP operator when this NPDES Permit is renewed the next time.

An operator log book is required to be maintained at the Brookville WWTP. This requirement is detailed in OAC 3745-7-09. Brookville currently does not maintain an operator log that contains the required information. Brookville must immediately comply with this requirement.



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The MORs indicates that parameters not detected have had their detection limit reported. This is not correct. Parameters not detected should be reported as "AA" and the detection limit should be reported in the remarks section. Brookville indicated that they recently became aware of this requirement and are now complying.

The wastewater samples are required to be sampled and tested in accordance to 40 CFR Part 136. Brookville was not sure if they were complying with these requirements. The following is a website which may be used to obtain a copy of this regulation: <http://www.epa.gov/lawsregs/search/40cfr.html>. Brookville must ensure the wastewater is sampled and tested in accordance to this code.

The effluent composite sampler refrigerator temperature is not recorded to document proper sample preservation. Brookville must maintain these records to document the proper sample preservation. Records of temperature also do not appear to be maintained for the laboratory refrigerator and oven. Brookville must also maintain records of these temperatures.



NPDES Permit #: OH0u20605
OEPA Permit #: 1PC00000*GD

Attachment I
Brookville WWTP
Effluent Violations for January 2005 through December 2007

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2005	TSS	Weekly	mg/l	12	15
April 2005	TSS	Weekly	kg/day	54.6	87.5
April 2005	pH	Daily	S.U.	6.5	6.3
September 2007	Fecal Coliform	Monthly	#/100ml	1000	3496
September 2007	Fecal Coliform	Weekly	#/100ml	2000	2280
September 2007	Fecal Coliform	Weekly	#/100ml	2000	5691
September 2007	Fecal Coliform	Weekly	#/100ml	2000	3790
September 2007	Fecal Coliform	Weekly	#/100ml	2000	2633

