



State of Ohio Environmental Protection Agency

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1PL0000120080929

MONTGOME EASTERN REGIONAL WATER RECLAMATION
FACILITY *

WALLER, MICHELLE 2008/09/29



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402

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

October 3, 2008

Mark Livengood
1850 Spaulding Road
Kettering, Ohio 45432

RE: Eastern Regional Water Reclamation Facility Compliance Evaluation Inspection
NPDES Permit No. OH0026590/ OEPA Permit No. 1PL00001*LD

Dear Mr. Livengood:

On September 22, 2008, Mike Zimmerman and I conducted a NPDES Compliance Evaluation Inspection at the Fernald Eastern Regional Water Reclamation Facility. Kenny Linebaugh and you were present representing the facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

Two actions are recommended for this facility.

1. The Operator of Record did not have his certificate displayed on-site as required by OAC 3745-7-05(c). Post the certificate within seven days.
2. During the inspection it was noted that the Ultrasonic at the Parshall flume is not calibrated, instead checked against a flow measuring stick. Please send this office a letter stating when the Ultrasonic will be calibrated along with a plan for periodically recalibrating the meter as recommended per manufacturers specifications.

It was brought to our attention that the Operator of Record, Kenny Linebaugh, will be retiring in February 2009. Please keep in mind that according to OAC 3745-7-02(A)(2)(b), "Notification shall be made on a form acceptable to the director within three days of a change in an operator of record".

Thank you and your staff for the time extended during the inspection process. If you have any questions, please contact me by phone at (937) 285-6028 or by e-mail at michelle.waller@epa.state.oh.us.

Respectfully,

Michelle Waller,
Environmental Specialist II
Division of Surface Water

Enclosures



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
1PL00001*LD	OH0026590	9/22/2008	C	S	11

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Eastern Regional Water Reclamation Facility 1802 Spaulding Road Kettering, Ohio 45432	1:00 pm	1/30/2004
	Exit Time	Permit Expiration Date
	3:20 pm	1/31/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mark Livengood, Superintendent Kenney Linebaugh	(937) 781-2559 (937) 496-7070	
Name, Address and Title of Responsible Official	Phone Number	
Kenny Linebaugh 1850 Spaulding Road Kettering, Ohio 45432	(937) 496-7070	

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
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Flow measurement is listed as marginal as it was noted during the inspection that the Ultrasonic at the Parshall Flume is not calibrated. The Ultrasonic should be calibrated periodically as recommended per manufacturers specification.	
Inspector	Reviewer
 Michelle Waller Division of Surface Water Southwest District Office	 Martyn G. Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
10/13/2008 Date	10/13/08 Date

Permit #: 1PL00001*LD
NPDES #: OH0026590

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..... Y
- (g) Notification given to State of new, different or increased discharges..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Permit renewal application submitted 8/1/2007.
Ferric chloride process added since last inspection.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... N/A
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Review period 8/1/2006 - 8/1/2008.
Two effluent violations in February 2007. Noncompliance report was submitted for the violations.

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)..... IV
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: IV
- (f) Copy of certificate of Operator of Record displayed on-site..... N
- (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)

Computer log.
- (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..... N
 - 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..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (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..... N
- (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:

Only one lift station in the collection system. Station vacuumed out and hauled to plant if necessary.

Malcolm Pirnie is doing a study for Montgomery County and the City of Dayton based on a five year, six hour rain event. They will use the results of this model to prioritize the work they will do for I&I.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: 4/28/04 Approval #: 05-437-PW Not submitted N/A
- (b) Sludge management plan current..... Y
(c) Sludge adequately disposed..... Y
(Method: Land application)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... Y
(Name: Synagro)
(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:

1559 tons applied in 2007.

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 N
(Date of last calibration:)
- (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:

Ultrasonic and Parshall flume checked, but not calibrated.

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. 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:
Priority pollutants
Lab name: Mercury One

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
- Date:

Comments/Status:

DMRQA sent in last month, results not received yet.

Section J: Effluent/Receiving Water Observations

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

Comments/Status:

No flow from upstream.

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: