



**Environmental
Protection Agency**

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



1100000520080519

MONTGOME USDOE CH2M HILL MOUND INC

OSIKA, MARY

2008/05/19



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2911

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

May 19, 2008

Art Kleinrath
US Department of Energy
Mound View Building
955 Mound Road
Miamisburg, Ohio 45342

RE: Compliance Evaluation Inspection
NPDES Permit no. 11O00005*JD
NPDES applic. no. OH0009857

Dear Mr. Kleinrath:

On May 13, 2008, I met with you, Chuck Friedman and Bob Ransbottom to conduct a compliance evaluation inspection for the discharges regulated under the NPDES permit for the Mound Closure Project site. A copy of my inspection report is attached. A satisfactory rating was given to all areas evaluated during this inspection. No response to this inspection is necessary. If you do have questions about this report, please call me at (937) 285-6101 or contact me at my email address: Mary.Osika@epa.state.oh.us.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

Enclosure

Cc: Charles Friedman, Stoller
Robert Ransbottom, Stoller





Summary of Findings/Comments

The site will be transitioning over to MMCIC soon, most likely by October 2009. The sewage treatment plant will be taken off line and sewers connected to the City of Miamisburg near the end of 2008. The NPDES permit is set to expire by the end of July 2008 and due to the transitioning and pending elimination of the sewage treatment, the NPDES permit renewal process will be delayed with the likelihood that no permit will be needed for these discharges after the transition.

It was pointed out that the mailing address is incorrect for this facility. This has now been corrected in the NPDES database in Columbus and the mailing address should be correct for future mailings from the Central Ohio EPA office in Columbus.

During the review period of May 2007 through April 2008, there were 2 effluent limit violations noted. There was one at outfall 001 for Copper on 10/2/2007 and one for outfall 002 for Total Suspended Solids for the month of October 2007.

The average flow rate from the sewage treatment plant at outfall 001 has averaged less than 10,000 gallons per day.





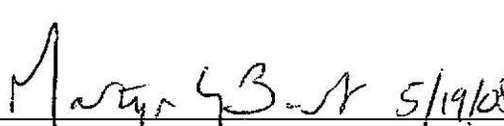
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11O00005*JD	OH0009857	5/13/2008	C	S	4

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
US Department of Energy Mound Closure Project 955 Mound Road Miamisburg OH 45342	9:30 am	April 1, 2007
	Exit Time	Permit Expiration Date
	12:30 pm	July 31, 2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Art Kleinrath, Mound Site Manager, USDOE Chuck Friedman, Environmental & Compl. Officer, Stoller Bob Ransbottom, Project Engineer, Stoller	937-847-8350 x 318 937-847-8350 x 302 937-847-8350 x 320	
Name, Address and Title of Responsible Official	Phone Number	
Art Kleinrath, Mound Site Manager Mound View Building 955 Mound Road Miamisburg, Ohio 45342	937-847-8350 x 318	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	N	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)	
See attached Summary of Findings/Comments.	
Inspector	Reviewer
 5/19/08	 5/19/08
Mary Osika Environmental Specialist 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

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee N
- (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/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

a) Renewal application lists correct mailing address of 955 Mound Road, Miamisburg, OH 45342. Reference to CH2M Hill should be deleted along with old address of 1 Mound Avenue, Miamisburg, OH 45343.
f) Chlorination eliminated, UV disinfection added via approved PTI.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... N
- (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:

See attached findings/comments for summary of permit 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)..... N/A
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
- (f) Copy of certificate of Operator of Record displayed on-site..... N/A
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (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..... Y
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)
 - b) Hard bound book kept on site. Recommend operator keep times logged in and out of work area.
- (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..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (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/A
- (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..... N
- (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:

b) one minor manhole overflow was reported to John Spittler, DSW when a sewer became plugged.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
- (c) Sludge adequately disposed..... Y
(Method: hauled away as LSA waste)
- (d) If sludge is incinerated, where is ash disposed of : N/A
- (e) Is sludge disposal contracted..... Y
(Name:Energy Solutions (EnviroCare))
- (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)..... N/A

Comments/Status:

Sludge is primarily wasted to eliminate inert solids from clogging sand filters. Sludge holding tank is getting full and will be disposed before plant is taken off line.

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: July, 2006)
- (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:

b) calibration is recommended, this item is being scheduled at facility.
See summary of findings/comments for average flow rate during review period.

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

Comments/Status:

d) (i) Composite sample collection refrigerator may need attention on door seal to ensure refrigerator is keeping samples at the proper temperature. At time of inspection door to refrigerator was not sealing. This will be corrected by facility.

Section I: Self-Monitoring Program (cont'd)

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
- Lab name and parameters analyzed by commercial lab(s):
 Stoller – pH
 GEL Lab – Metals, COD, NH3-N, P, O&G
 MASI 0 CBOD5, FC, TDS, TSS

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: October 24, 2007

Comments/Status:

DMRQA – 4 parameters rated not acceptable were TRC, NH3-N, FC, Cu
 Stolle- TRC is no longer a parameter in permit, no corrective action needed
 MASI – FC was erroneously analyzed with incorrect method, corrective action was required by reanalyzing using correct method, acceptable results.
 GEL Lab –NH3-N and Cu needed corrective action by reanalyzing, acceptable results shown.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	no	no	no	no	no	no	no	
002	no	no	no	no	no	no	no	

Comments/Status:

Observed eventual discharge point to Great Miami River from Mound Overflow Creek at the bike path. The river was high and backing up into the creek.

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/E
- (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:

b) This is a federal clean-up site.



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