



**Environmental  
Protection Agency**

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



\*1PD0000420090923\*

WARREN

FRANKLIN REGIONAL WWTP

WARE, MAUREEN

2009/09/23



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

*File: Warren Co  
Franklin Area WWTP  
sewer age*

September 23, 2009

Joséph Hart  
Franklin Area WWTP  
201 Baxter Dr.  
Franklin, Ohio 45005

RE: Franklin WWTP NPDES Permit 1PD00004 Compliance Evaluation Inspection (CEI)

Dear Mr. Hart:

On September 17, 2009, I conducted a CEI at the Franklin Area WWTP. You represented this facility. A copy of my inspection report is enclosed.

As indicated on the NPDES CEI form, two areas that were evaluated during the inspection were rated as marginal. Collection System was rated as marginal due to the lack of a document effort on the part of Franklin, Germantown, and Carlisle to remove infiltration and inflow from their respective collection systems. Effluent/Receiving Waters was rated as marginal due to clumps of sludge floating up in the clarifiers and going over the weirs to the river.

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Please submit a written response to this office within 30 days indicating the steps you have taken or intend to take to correct the above problem.

I appreciate the time and courtesy that was extended to me during the inspection. If you have any questions or comments concerning the contents of this letter, please feel free to contact me at this office.

Sincerely,

Maureen M. Ware  
Division of Surface Water

Ec: Warren County Combined Health Dist.





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 |
| 1PD00004                               | OH0025275 | 09/17/09       | C               | S         | 1             |

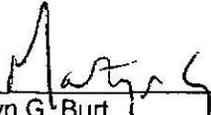
| Section B: Facility Data  |                 |                        |
|---|-----------------|------------------------|
| Name and Location of Facility Inspected   | Entry Time      | Permit Effective Date  |
| Franklin Area WWTP<br>201 Baxter Dr.<br>Franklin, Ohio 45005  | 10:00 AM        | 08/01/09               |
|   | Exit Time       | Permit Expiration Date |
|   | 12:01 PM        | 01/31/14               |
| Name(s) and Title(s) of On-Site Representatives   | Phone Number(s) |                        |
| Joe Hart, Operator  | 937-746-1711    |                        |
| Name, Address and Title of Responsible Official   | Phone Number    |                        |
| Veolia Water North America-Central, LLC<br>184 Shuman Blvd Ste 450<br>Naperville, Illinois 60563-8323 |                 |                        |

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

**Section D: Summary of Findings (Attach additional sheets if necessary)**

The collection system was rated as marginal due to no apparent I/I removal efforts by Franklin, Germantown, or Carlisle. The Effluent/Receiving Waters was rated as marginal due to sludge clumps floating to the surface and over the final clarifier weir and then to the river.

The permanent bypass line from the influent pump station to chlorination has been installed. The temporary bypass from the influent pump station to the sludge lagoon has been modified from the detail plans to now use aluminum pipe sections instead of a flexible hose.

| Inspector  | Reviewer   |
|--|--|
| <br>Maureen M. Ware<br>Division of Surface Water<br>Southwest District Office | <br>Martyn G. Burt<br>Environmental Supervisor<br>Division of Surface Water<br>Southwest District Office |
| 9/23/09<br>Date  | 9/23/09<br>Date  |



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:**

\*Although not a treatment process, the bypass line from the influent pump station to disinfection has been installed, but not yet used. The bypass from the influent pump station to the sludge lagoon is to use sections of aluminum pipe instead of what the detail plans showed (flexible hose).

**Section F: Compliance**

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

**Comments/Status:**

Compliance schedule is for Municipal Pretreatment Schedule. There was one numerical violation in the review period of the last year, which was for Oil and Grease.



**Section G: Operation & Maintenance (cont.)**

**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...N
- (k) Are any portions of the sewer system at or near capacity.....N

**Comments/Status:**

While there have not been any reports of overflows for the review period, there have been no reports indicating any work the municipalities have done to remove the I/I that has caused WWTP violations in the past due to high flows.

A sample (May 2009) MOR was compared against the bench sheets for that month and found to be accurate.



**Section I: Self-Monitoring Program (cont.)**

**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...Y
  - (d) If (c) is yes, are results in permittee's self-monitoring report.....Y
  - (e) Commercial laboratory used.....Y
- Parameters analyzed by commercial lab: O&G, metals, phosphorus, nitrate & nitrite, sludge dioxin, low level Hg.

Lab name: Belmont

*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:**

