



Environmental
Protection Agency

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

FILE COPY

August 3, 2011

Dan Miller, Operator
United Rotary Brush Co. Inc.
20078 State Route 4
Marysville, OH 43040

Re: **United Rotary Brush Co Inc**
NPDES Permit 4IM00102/ OH0121304
Reconnaissance Inspection
Union County
Notice of Violation

Dear Mr. Miller:

On July 20, 2011, a Reconnaissance Inspection was conducted at the United Rotary Brush Company's waste water treatment plant. Present for the inspection were you and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

This inspection was a follow-up to a brief visual inspection conducted on July 6, 2011. At the previous inspection, there were weeds growing on the sand bed, the mixed liquor in the aeration tank looked black, there were no chlorination tablets in the chlorination device, and there appeared to be no place for a log book on site. I was overall satisfied with the progress that has been made on operations since July 6, but due to improper operator certifications, this letter serves as a **Notice of Violation**.

Findings:

1. Only one of the blowers is functioning. You have ordered and received the replacement parts to repair the blower. Once repaired, it is recommended that you continuously aerate your tank until the mixed liquor looks milky brown. **Please inform this office when the blower is repaired.**
2. The sand beds were completely cleared of weeds.
3. The chlorination and dechlorination tanks were both filled with tablets.

4. You indicated that you were working towards getting a log book together based on past log books you reviewed. **Please inform this office when you start maintaining a log book.**
5. Attached is a list of permit effluent violations which have occurred since June 2009. **Please look through your records and submit the flow rates fro February 2010 if possible.**
6. Part II A of your NPDES permit requires that the wastewater treatment works must be under supervision of a Class 1 or higher State certified operator. United Rotary Brush Company does not employ a certified operator. **Please respond with a schedule of meeting this permit requirement.**

Although the permit requires a Class 1 operator, the requirement will likely change to a Class A operator during the next permit renewal. You can find more information about becoming a certified waste water treatment operator here:

<http://www.epa.ohio.gov/ddagw/opcert.aspx>

I also recommend using a contract operator while you work towards obtaining Class A waste water operator certification. You can view certified contract operators here:

http://www.epa.ohio.gov/portals/28/documents/opcert/contract_operator_list.pdf

Attached is the Reconnaissance Inspection Report. **Please provide a written response to the above comments by September 2, 2011.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.ohio.gov.

Sincerely,



Cole Miller
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

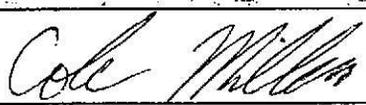
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IM00102	OH0121304	RI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
7/20/2011	10:00 AM	10:30 AM	Yes	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
United Rotary Brush Co Inc 20078 State Route 4 Marysville, OH 43040	8/1/2007
	Permit Expiration Date
	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Dan Miller, Operator	(937) 645-4513
Name and Title of Responsible Official	Phone Number
Dan Miller, Operator	(937) 645-4513

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	The plant is operating without a licensed operator.
M/S	Operations & Maintenance	One blower is not functioning but it is in the process of being repaired.
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
N	Receiving Waters	
N	Laboratory	

Comments:

Signatures	
 8/3/11	 7/25/11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for United Rotary Brush Co Inc between 6/1/2009 to 7/1/2011

Summary

Permit Effluent Limit Violations: 2
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 27
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2009	001	Total Suspended Solids	30D Conc	12	20.	6/1/2009
June 2009	001	Total Suspended Solids	1D Conc	18	20.	6/29/2009

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
February 2010	001	Flow Rate	1/Day	1	0	02/02/2010
February 2010	001	Flow Rate	1/Day	1	0	02/03/2010
February 2010	001	Flow Rate	1/Day	1	0	02/04/2010
February 2010	001	Flow Rate	1/Day	1	0	02/05/2010
February 2010	001	Flow Rate	1/Day	1	0	02/06/2010
February 2010	001	Flow Rate	1/Day	1	0	02/07/2010
February 2010	001	Flow Rate	1/Day	1	0	02/08/2010
February 2010	001	Flow Rate	1/Day	1	0	02/09/2010
February 2010	001	Flow Rate	1/Day	1	0	02/10/2010
February 2010	001	Flow Rate	1/Day	1	0	02/11/2010
February 2010	001	Flow Rate	1/Day	1	0	02/12/2010
February 2010	001	Flow Rate	1/Day	1	0	02/13/2010
February 2010	001	Flow Rate	1/Day	1	0	02/14/2010

February 2010	001	Flow Rate	1/Day	1	0	02/15/2010
February 2010	001	Flow Rate	1/Day	1	0	02/16/2010
February 2010	001	Flow Rate	1/Day	1	0	02/17/2010
February 2010	001	Flow Rate	1/Day	1	0	02/18/2010
February 2010	001	Flow Rate	1/Day	1	0	02/19/2010
February 2010	001	Flow Rate	1/Day	1	0	02/20/2010
February 2010	001	Flow Rate	1/Day	1	0	02/21/2010
February 2010	001	Flow Rate	1/Day	1	0	02/22/2010
February 2010	001	Flow Rate	1/Day	1	0	02/23/2010
February 2010	001	Flow Rate	1/Day	1	0	02/24/2010
February 2010	001	Flow Rate	1/Day	1	0	02/25/2010
February 2010	001	Flow Rate	1/Day	1	0	02/26/2010
February 2010	001	Flow Rate	1/Day	1	0	02/27/2010
February 2010	001	Flow Rate	1/Day	1	0	02/28/2010