OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Allen County
PCS Nitrogen Ohio, L.P.
NPDES Permit

May 14, 2009

Mr. Todd Sutton, General Manager
PCS Nitrogen Ohio, L.P.
P.O. Box 1901
Lima, Ohio 45802

Dear Mr. Sutton:

On April 28, 2009, a National Pollutant Discharge Elimination System (NPDES) permit compliance/sampling inspection was conducted at PCS Nitrogen Ohio. Ms. Sherri Zeller and Mr. Thomas Say were present and provided information on operations and maintenance at the facility. The inspection included an interview with completion of the enclosed inspection report, a tour of the facility, inspection of the wastewater treatment system and observation of all NPDES permitted Outfalls.

During our visit, the Chem Seps treatment system was in operation. The final effluent discharging to the Ottawa River from Outfall 001 was clear. A 24 hour composite sample was collected at Outfall 001 from April 27th to April 28th to determine compliance with NPDES permit limits. There was no discharge from Outfalls 002 or 003. The discharge from Outfall 004 was turbid with a muddy color.

Since our last inspection, NPDES permit violations were reported for ammonia (August 2008) and foaming and a color change at Outfall 001 (March 2009). Our records indicate that the ammonia violations are related to a power outage, where flood water was directed to the Ammonium Nitrate Neutralizer to stop the reaction. The flood water overflowed its tank containment system and made its way into the sewer system until the sewers were diverted and the water was retained on site. The foam and subsequent color change incident in March 2009, were caused by a detergent used in the INEOS cooling tower, being released into a floor drain at the INEOS water treatment building followed by antifoam being introduced into the same floor drain causing discoloration of the river.

As discussed during the inspection, we recommend that efforts be undertaken to label, mark or designate all catch basins, drains, etc. that have a direct connection to your outfall. All employees and contractors should then receive training in an effort to prevent future uncontrolled releases to the River.

Our completed inspection report is enclosed for your records. A copy of our sample results will be forwarded once they are received. If you have any questions, please contact Mr. Tom Poffenbarger at (419) 373-3008.

Sincerely,

Elizabeth A. Wick, P.E.
District Engineer/Unit Supervisor
Division of Surface Water

/llr

Enclosure

pc: DSW-NWDO File

Permit # : 2IF00004
NPDES #: OH0002615

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NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2IF00004	OH0002615	4/28/09	S	S	2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
PCS Nitrogen Ohio, L.P. 1900 Fort Amanda Road Lima, Ohio 45802	1:15 PM	12/1/2005
	Exit Time	**Permit Expiration Date**
	3:35 PM	10/31/2010

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Ms. Sherri Zeller, Sr. Environmental Engineer Mr. Thomas Say, Quality/Distribution Manager	419-226-1432 419-226-1248
Name, Address and Title of Responsible Official	**Phone Number**
Mr. Todd Sutton, General Manager PCS Nitrogen Ohio, L.P. P. O. Box 1901 Lima, Ohio 45802	419-226-1221

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

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

Discharge from Outfall 001 to Ottawa River was clear. There was no discharge from Outfalls 002 & 003. The discharge from Outfall 004 was turbid with a muddy color.

NPDES Permit violations for ammonia were reported in August 2008. NPDES permit violations for discharge of foam and a color change were reported in March 2009.

We recommend that catch basins and drains that have a direct connection to your outfall be appropriately designated or labeled in an effot to prevent furture uncontrolled releases.

Inspector	Reviewer
Thomas Poffenbarger 5/8/09	5/12/09
Thomas Poffenbarger, P.E. Date District Engineer Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Date Water Quality Engineer Division of Surface Water Northwest District Office

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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).....	Y
(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:

(f) Some cooling water additives have been changed - DFFOs issued for approval.

Section F: Compliance Schedules/Violations

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

Comments/Status:

(a) Ammonia - August 2008
Foam/color change - March 2009
(b) PCS is working with Ineous
(c) Storm Water Pollutant Reduction Plan
(e) Retention Pond began operation April 24, 2008.

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Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a)	Standby power available.....generator ☐ or dual feed ☐.....	N
(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..... Class: I	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.....	N
(j)	Operation and maintenance manual provided and maintained.....	Y
(k)	Any plant bypasses since last inspection.....	N
(l)	Regulatory agency notified of bypasses..... On MORs ☐ and/or Spill Hotline (1-800-282-9378) ☐	N/A
(m)	Any hydraulic and/or organic overloads since last inspection.....	N

Record Keeping:

(a)	Log book provided.....	N/A
(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/A
(d)	Log book contains the following:	
	I. Identification of treatment works.....	N/A
	II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7.....	N/A
	III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs).....	N/A
	IV. Laboratory results (unless documented on bench sheets)...	N/A
	V. Identification of person making log entries.....	N/A
(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/A

Section G: Operation & Maintenance (con't)

Collection System:

(a)	Percent combined system: %	
(b)	Any collection system overflows since last inspection..... (CSO ☐ and/or SSO ☐)	N/A
(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/A
(g)	Lift station alarms provided and maintained.....	N/A
(h)	Are lift stations equipped with permanent standby power or equivalent.....	N/A
(i)	Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection.....	N/A
(j)	Any complaints received since last inspection of basement flooding	N/A
(k)	Are any portions of the sewer system at or near capacity.....	N/A

Comments/Status:

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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..... N/A
(Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... N/A
(Name:)
(f) Has amount of sludge generated changed significantly since last inspection..... N/A
(g) Adequate sludge storage provided at plant.....N/A
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... N/A
(j) Any complaints received in last year regarding sludge..... N/A
(k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

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:Bubbler)

(b) Calibration frequency adequate ..... Y
(Date of last calibration: 4/22/2009)
(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:

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..... Y
(e) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: Mercury, TKN, Barium, Strontium, Organic Nitrogen, Ammonia, Copper, Bio-Assay

Lab name: Alloway

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:

(b) Urea method developed by BP, accepted by Ohio EPA.

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Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	none	none	none	none	none	clear	
002	AL						
003	AL						
004	none	none	severe	none	none	muddy	

Comments/Status:

AL = No Discharge

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: