



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

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

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

December 21, 2009

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

Dear Mr. Sutton:

On December 8, 2009, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at PCS Nitrogen Ohio. Ms. Lisa Strbik 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. There was no discharge from Outfalls 002, 003 or 004.

Since our last inspection, NPDES permit violations were reported for ammonia (October 2009). Mr. Say indicated that some sewers are currently being replaced in an effort to prevent future violations.

Our completed inspection report is enclosed for your records. 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

/csl  
Enclosure  
pc: DSW-NWDO File

Permit #: 2IF00004  
 NPDES #: OH0002615



State of Ohio Environmental Protection Agency  
 Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2IF00004	OH0002615	12/8/2009	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	10:00 AM	12/1/2005
	Exit Time	Permit Expiration Date
	11:35 AM	10/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ms. Lisa Strbik, 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)			
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Compliance Schedule
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input checked="" type="checkbox"/> Collection System
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Other		

**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 & 004.

Inspector	Reviewer
<i>Thomas Poffenbarger</i> 12/17/09	<i>Elizabeth A. Wick</i> 12/16/09
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

Permit #: 2IF00004  
NPDES #: OH0002615

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:

(c) Nitric Acid Plant was expanded.

**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
- (e) Permittee is meeting compliance schedule..... Y

Comments/Status:

- (a) Ammonia - Oct 09
- (b) Replacing existing piping, working on sewers
- (c) Storm Water Pollutant Reduction Plan
- (e) Retention Pond began operation April 24, 2008.

**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..... N/A  
 Class: I
- (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..... 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..... 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..... N/A  
(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/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:**

**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: 12/7/09)
- (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:**

(d) Flow meter is not accurate if outfall is inundated with flow from the River.

**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, Phosphorus

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.

**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	AL						

**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:**