

**Environmental  
Protection Agency**

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

January 26, 2011

**Re:** Pretreatment  
EnviroTank Clean, Inc.  
City of Belpre  
ODP00005\*EP  
Compliance Inspection

Mr. Ray Lutes, Vice President  
EnviroTank Clean, Inc.  
Route 1  
P.O. Box 372  
Belpre, Ohio 45714

Dear Mr. Lutes:

On December 17, 2010, I inspected EnviroTank Clean in Belpre. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You represented EnviroTank Clean during the inspection. ETC appeared to be in substantial compliance with its IDP at the time of the inspection.

### **General Facility Description**

EnviroTank Clean performs tank truck cleaning and treats wastewaters and sludges from various off site customers. Waste streams may include landfill leachate, purge water from monitoring wells, recovered product spills, contaminated soils, oil water separators, machining lubricants, and underground storage tank cleaning. An increasing percentage of the wastewaters are from servicing oil and gas field operations. Oil and gas field wastewaters include pit sludges, drilling muds, pit waters, flowback waters, and production waters. High salinity wastewaters are hauled to an injection well for disposal.

Daily flows averaged approximately 20,000 gallons during the past year. EnviroTank's discharge is regulated by the Centralized Waste Treatment Point Source Category 40 CFR 437.46 Subpart D.

### **Pretreatment System**

The wastewater treatment system includes storage in one of five holding tanks, equalization, emulsion breaking, oil removal, metals precipitation, neutralization, primary clarification, dissolved air floatation, two stage activated sludge treatment, secondary clarification, and sand filtration. An aerated sludge holding tank is used for sludge digestion followed by a belt filter press for dewatering.

Sludge handling facilities include 4 drying beds for dewatering. The facility also has a covered, sloped mixing area for solidifying oily liquids and sludges.

**Comments:**

EnviroTank reported the following exceedances of its IDP limits between January 2009 and July 2010.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01102	Tin, Total (Sn)	1D Conc	409	1770.	1/5/2010
001	01102	Tin, Total (Sn)	30D Conc	120	1770.	1/1/2010
001	01102	Tin, Total (Sn)	30D Conc	120	244.	4/1/2010
001	01102	Tin, Total (Sn)	30D Conc	120	140.	5/1/2010

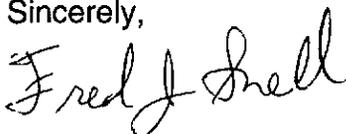
Upon discovery of the effluent limit exceedances for tin, EnviroTank Clean reviewed the wastewaters it had received prior to the discharges but was unable to identify the source of the tin. All waste streams are now tested for tin as part of initial waste profiles to identify tin bearing wastes.

EnviroTank has been gradually increasing its oil and gas field services business. This business is expected to continue increasing due to projected significant gas well development activity in the region. EnviroTank should not discharge wastewaters to the Belpre sewer from hydraulic fracturing, well drilling pits, or production waters, with or without pretreatment, unless the facility has obtained prior approval from Ohio EPA and the City of Belpre for such discharges.

A stairway was added at the lamella clarifier and new grates were installed over the activated sludge tanks since the previous inspection.

You may contact me at (740) 380-5423 office with any questions.

Sincerely,



Fred J. Snell  
Pretreatment Coordinator  
Division of Surface Water

FJS/dh

Enclosure

- c: Bill Harpold, City of Belpre
- c: Mike Betz, City of Belpre
- c: Pretreatment Unit, DSW, CO

# Pretreatment Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00005*EP	OHP000049	December 17, 2010	6	S	2

## B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
EnviroTank Clean 12381 State Route 7 Belpre, Ohio 45714	10:30 a.m.	November 1, 2007
	Exit Time	Permit Expiration Date
	1:30 p.m.	October 31, 2012

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Ray Lutes, Vice President	(740) 423-0907 (304) 482-4097
Name, Address, & Title of Responsible Official	Phone Number
B.S. Saluja, P.E., President	(304) 755-8448

## C. AREAS EVALUATED DURING INSPECTION

<u>  S  </u> Permit	<u>  S  </u> Flow Measurement	<u>  S  </u> Pretreatment
<u>  S  </u> Records/Reports	<u>  S  </u> Laboratory	<u>  N/A  </u> Compliance Schedules
<u>  S  </u> Operations & Maintenance	<u>  S  </u> Effluent/Receiving Waters	<u>  S  </u> Self-Monitoring Program
<u>  S  </u> Facility Site Review	<u>  S  </u> Sludge Storage/Disposal	<u>      </u> Other
<u>  S  </u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

## D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.

Fred J. Snell  
Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

1/27/11  
Date

Timothy M. Campbell  
Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

1/27/11  
Date