



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

December 7, 2007

Re: Pretreatment
Compliance Inspection
Superior Marine Ways, Inc.
Permit No. ODP00037
Village of South Point

Mr. William Hunt, Director of Env. Safety and Health
Superior Marine Ways, Inc.
P.O. Box 519
South Point, Ohio 45680

Dear Mr. Hunt:

On November 14, 2007, I conducted a compliance inspection at Superior Marine Ways, Inc. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You represented Superior Marine Ways during the inspection.

General Facility Description

Superior Marine Ways performs harbor service, barge cleaning and barge repair. Operations may include fabrication, machining, welding and painting of marine equipment.

Wastewaters are generated from barge cleaning, tow boat bilge pumping, and heavy equipment washing.

Barge cleaning is performed on coal, gravel, sand and grain barges. Open top barges are cleaned by first removing residual products using a front end loader and shovels, then a spray rinse is performed. Closed hopper top barges are cleaned using rinse water. Cleaning water from both barge types is then pumped to a closed hopper top storage barge. Wastewaters are then transferred to the wastewater treatment building storage tanks using a vacuum truck.

The wastewater treatment system consists of storage in four holding tanks, oil decant, oil skimming, coalescing oil separator, ozone disinfection, media and cartridge filtration, and activated carbon filtration. Treated water may be reused in a pressure washing system to clean equipment, or discharged to the South Point Sewer. Residual sludge from the treatment system is taken to Green Valley Landfill, and oil removed from the treatment system is hauled by Safety Kleen to its Poca, West Virginia, facility.

Flows are highly variable. The discharge to the sewer averaged roughly 3000 gallons per month during the past year.

Effluent Limit Exceedances

Superior Marine Ways reported the following exceedances of its IDP limits between July 2006 and June 2007:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	30.6	35.	1/1/2006
001	39100	Bis(2-ethylhexyl) Phth	30D Conc	101	125.	11/1/2006
001	00530	Total Suspended Solids	1D Conc	74.1	112.	5/4/2007
001	00530	Total Suspended Solids	30D Conc	30.6	41.	1/1/2007
001	00530	Total Suspended Solids	30D Conc	30.6	112.	5/1/2007
001	01092	Zinc, Total (Zn)	1D Conc	8260	14100.	5/4/2007
001	01092	Zinc, Total (Zn)	30D Conc	4500	14100.	5/1/2007
001	01152	Titanium, Total (Ti)	30D Conc	29.9	45.2	5/1/2007
001	77804	N-Octadecane	30D Conc	302	354.	5/1/2007

Please investigate the cause(s) of the effluent limit exceedances reported for the sample collected in May, 2007 and report your findings to Ohio EPA.

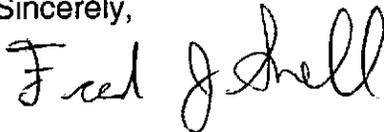
Comments

1. Superior Marine has reported daily flow on past monitoring reports as a monthly total divided by the number of days of the month. Ohio EPA has requested that Superior Marine report flow on future reports as the measured total flow for the discharge day on the date of sampling. This will provide information on the range of daily flows discharged from the facility. Superior Marine should ensure the flow meter is calibrated on at least an annual basis, and more often if needed.
2. Superior Marine has been collecting single grab samples to fulfill the monitoring requirements of its IDP. The IDP calls for collection of composite samples for many of the required constituents. Superior Marine should collect manual composite samples for the required pollutants in the IDP to ensure samples are representative. A minimum of 3 grab samples collected throughout the discharge day should be combined for composite samples.
3. Based on a review of current operations performed at Superior Marine, it appears that the wastewaters generated at the facility are not subject to point source categorical standards. Superior Marine's discharge permit was developed based on the application of 40 CFR 437, the Centralized Waste Treatment Category. Ohio EPA may modify Superior Marine's IDP in the near future after a more careful

review. The modification would likely result in a reduction in the number of parameters to be monitored and the removal of some of the effluent limits from the IDP.

Please respond to this letter in writing within 30 days. You may contact me at (740) 380-5423 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Fred J. Snell".

Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

- c: Patrick Leighty, Village of South Point
- c: Pretreatment Unit, DSW, CO

Pretreatment Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00037*BP	OH0021814	November 14, 2007	P	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Superior Marine Ways, Inc. Mile 314.9 Ohio River, P.O. Box 519 South Point, Ohio 45680	10:00 a.m.	November 1, 2007
	Exit Time	Permit Expiration Date
	1:00 p.m.	October 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Bill Hunt, Director, Environmental Safety and Health	(740) 894-6224
Name, Address and Title of Responsible Official	Phone Number
Dale Manns, President	(740) 894-6224

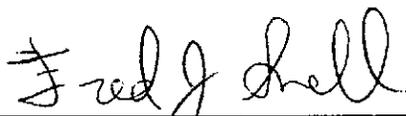
C. AREAS EVALUATED DURING INSPECTION

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Compliance Schedules
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> Collection System		

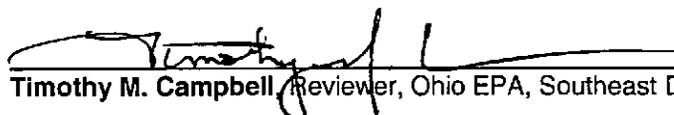
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached letter.


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

12/7/07
 Date


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

12/10/07
 Date