



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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www.epa.state.oh.us

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

November 25, 2009

Re: Coshocton County
Clow Water Systems Company
McWane, Inc.
Compliance Evaluation Inspection
Correspondence (IWW)

Ms. Heather A. Klesch, Environmental Manager
Clow Water Systems Company
P.O. Box 6001
Coshocton, Ohio 43812

Dear Ms. Klesch:

On November 10, 2009, Ohio EPA conducted a Compliance Evaluation Inspection at the Clow Water Systems Company plant in Coshocton County, Ohio. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 01S00017*ED (Effective date of 1/01/09) and to evaluate the wastewater treatment systems performance. Heather Klesch and Bill Coutts represented Clow during the inspection.

During the inspection, the facility seemed to be operating in compliance with the NPDES permit.

I noted that in addition to caustic soda for use in elevating pH, Clow has implemented using cement lining water. In the past, the volume of cement water at times created some ponding issues. The new beneficial use of the cement lining water should aid in minimizing excess water volumes.

The Bacteriological study required in the Schedule of Compliance Item 2 was completed on 8/14/09. Upon startup of the purge WWTP, the bacteria presence was shown to be eliminated from the discharge.

Please note, a Permit to Install (PTI) to meet the final effluent limit table for Cadmium, Copper, Silver, Zinc and Selenium is due January 1, 2010. This is required as Item 1.A in the Schedule of Compliance. If the existing facility's performance indicates compliance with the pending limit table, then submission of a PTI would not be required.

In review of historical compliance with NPDES 01S00017*ED, the following incidents resulted in a discharge which exceeded a maximum permitted concentration:

An incidental discharge occurred on 3/24/09 due to a pump failure. A grab sample indicated high concentrations for metals with estimated discharge volume of 300gal long over a 15 minute time period. Total Zinc was reported at 66,400ug/L and Total Cadmium was reported at 1,640ug/L which exceeded 560ug/L and 35ug/L respectively. The plant was being operated to recycle in order to optimize the effluent, however, a recycle pump failure led to a discharge.

On 10/21/09, chemical feed equipment reportedly malfunctioned for a time period less than 6 hours; a grab sample indicated a Zinc concentration of 722ug/L exceeding the 560ug/L maximum limit.

Each incident was immediately reported to the District office. Non-compliance notification was received with corrective actions reportedly taken.

A copy of our inspection report is enclosed. The assistance received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5272

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AMP/mlm

Enclosure

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIS00017*ED	OH0094455	November 10, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Clow Water Systems Company McWane, Inc. 2266 South Sixth Street P.O. Box 6001 Coshocton, Ohio 43812	10:00 a.m.	Jan 1, 2009
	Exit Time	Permit Expiration Date
	11:55 p.m.	Dec 31, 2013

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Heather A. Klesch, Environmental Manager Bill Coutts, Environmental Supervisor (Oversees WWTP)	(740) 622-6651
Name, Address and Title of Responsible Official	Phone Number
Jeff Otterstedt, GM and Vice President	

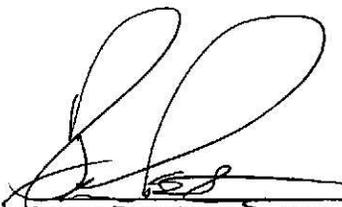
C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>S</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, NA = Not Applicable)

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

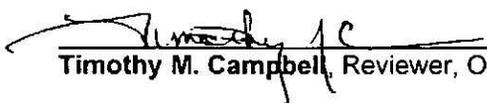
See attached cover letter



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

11-23-09

Date



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

11/25/09

Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X ¹			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection	X			
g. Notification given to state of new, different, or increased discharges	X			
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

¹Production rate is lower with 343 tons/day reported for Oct'09. Operations are at approx 8.5hrs/day vs. 20hrs/day permitted through DAPC.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection		X ¹		
b. Permittee is taking actions to resolve violations			X	
c. Permittee has compliance schedule	X ²			
d. Compliance schedule contained in: <u>Permit</u>	X			
e. Permittee is meeting compliance schedule	X			

¹An incidental discharge occurred on 3/24/09 due to a pump failure; a grab sample indicated high concentrations for metals with estimated discharge volume of 300gal over a 15 minute time period. On 10/21/09, chemical feed equipment reportedly malfunctioned for a time period less than 6 hours; a grab sample indicated a Zinc concentration in excess of the permitted maximum concentration.

²Bacteriological study was completed on 8-14-09. A permit to Install, if necessary upon plant performance, to meet the final effluent limit table for Cadmium, Copper, Silver, Zinc and Selenium is due 1/1/10.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: (Pump up system)		X		
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided:	X			
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			X	
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained Maximo - main. tracking	X			
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses:			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Collection System	Yes	No	N/A	N/E
a. Percent combined system: Stormwater is captured on site for treatment & use			X	
b. Any collection system overflows since last inspection (Sanitary goes to City WWTP)		X		
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system	X			
g. Lift station alarm systems provided and maintained				X
h. Are lift stations equipped with permanent standby power or equivalent		X		
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection		X		
j. Any complaints received since last inspection of basement flooding			X	
k. Are any portions of the sewer system at or near capacity				X

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): _____ Submitted Date _____
 _____ Approval Number _____
 _____ Not submitted _____
 _____ X _____ N/A _____

	Yes	No	N/A	N/E
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: <u>Bunker to Landfill</u>)	X			
d. If sludge is incinerated, where is ash disposed of? _____			X	
e. Is sludge disposal contracted (<u>Coshocton Landfill</u>)	X			
f. Has amount of sludge generated changed significantly since last inspection 200ton/Mo (has come down from 523ton/Mo with lower production activity)	X			
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (dewatering)	X			

¹Slag(exempt) is being placed as fill on the eastern edge of the site.

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained (use contract laboratory)			X	
g.	Satisfactory calibration and maintenance of instruments and equipment			X	
h.	Adequate records maintained			X	
i.	Results of latest U.S. EPA quality assurance performance sampling program: N/A				
	Date: _____	_____	Satisfactory		
		_____	Marginal		
		_____	Unsatisfactory		

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	none	none	clear	none	none	clear	