OhioEPA
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

August 16, 2007

Re: Jefferson County
Valley Converting Company, Inc.
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Michael Biasi, President
Valley Converting Co., Inc.
P.O. Box 279
Toronto, Ohio 43694

Dear Mr. Biasi:

On August 6, 2007, Ohio EPA conducted a Compliance Evaluation Inspection at Valley Converting. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0IA00006*FD and to evaluate the wastewater treatment systems performance. Previous monthly operating reports (MORs) submitted to the Ohio EPA indicate that the facility is in compliance. During the inspection, compliance was somewhat in question primarily based upon a review of the flow monitoring equipment and BOD_5 preservation and testing procedure.

The following is the reported violation(s) since May 1, 2003 the effective date of this permit:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	99989	Copper, Total Recoverable	1D Conc	45	61.	12/17/06

The permit issued for outfall 0IA00006*FD requires the Owner to report noncompliance as directed by Part III.12.E of the permit which shall contain information listed in Part III.12.B and Part III.12.C. Please submit a report identifying the copper noncompliance listed above. In reviewing the reported Copper data, the 61 ug/L deviated much further than the next highest reported concentration of 19 ug/L.

The following items also need addressed:

- Setup for ultrasonic meter and weir appears to have been modified with removal of a weir plate. Multiple undersized weirs were also shown in the flow meter house. Flow levels were continuous upstream to downstream on the weir which was currently being metered, thus the measurement could not accurately correlate the flow. The gravity discharge pipe was nearing capacity. A properly sized weir will need to be employed where all applicable flow ranges can be accurately correlated with the ultrasonic meter.

- Calibration will be necessary after modifying the flow monitoring setup and done so in accordance with manufacturer's recommendation. Keep a log of calibration dates with any relative notes.

- BOD_5 tests shall have a minimum depletion of 2.0 mg/L and 1.0 mg/L residual according to Standard Methods. Follow Standard Method's procedure ensuring adequate pH range, de-chlorinating, and most likely seeding the sample. Multiple dilutions are typical to ensure the accuracy of the results.

- Sampling refrigerator was filling while onsite, yet the unit was not refrigerating. There was no thermometer submersed in liquid to identify the temperature inside the sampler. A temperature should be recorded at the time of sampling into a log and/or chain of custody forms. The sampler should be maintained at 4°C (39-40°F).Chain of Custody forms (a copy of) are recommended to be kept with the owner. Please understand that the NPES permit places the responsibility of monitoring on the owner.

- Harry Crouch works as an independent contractor and provides the following testing – pH, Temp, TSS, and BOD_5. A copy of the most recent Discharge Monitoring Report Quality Assurance (DMRQA) is requested for each of the laboratory providers. It is recommended that the owner keep a copy of the most recent DMRQA to ensure the quality of reported data. While onsite during the inspection, Harry asked if a handheld pH meter would be appropriate for reporting purposes. The answer would be yes, and any model properly calibrated to the manufacturer's recommendation would be appropriate as long as it could measure to at least the tenth of a decimal. Temperature should be recorded alongside that of pH and many meters do both. Before purchasing a new meter, please contact Roman Khidekel at the Ohio EPA Division of Environmental Services to verify its acceptability; Mr. Khidekel can be reached at (614) 644-4234.

The Monthly Operating Report may be signed by an appropriately designated operator by having the Owner's responsible official/party designate that operator in writing. Such correspondence shall be sent to the appropriate Ohio EPA office to be kept on file.

A "Boneyard" is located adjacent to the treatment facility and appears to be the only stormwater exposure source noted during the inspection. Information regarding Ohio EPA's stormwater "no exposure" can be found at

http://www.epa.state.oh.us/dsw/storm/ind_noexp_cert.html.

I have attached the form associated with "no exposure" certification; the link above includes where to submit it. In the event that the "no exposure" certification does not apply, the facility would likely see Parts IV, V and VI back in the permit as was associated with it in the previous permit.

A copy of our inspection report is enclosed. Please respond detailing correcting the flow meter setup, BOD_5 testing procedure(s), refrigerated sampler, Copper violation, and DMRQA data within 14 calendar days. The assistance and cooperation 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

c: Aaron Wolfe - Ohio EPA/DSW

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IA00006*FD	OH0011738	August 6, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Valley Converting Co Inc 421 Loretta Avenue Toronto, Ohio 43694	10:45 a.m.	May 1, 2003
	Exit Time	**Permit Expiration Date**
	1:45 p.m.	April 30, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Michael Biasi, President Rich Brandt, Purchasing Agent Harry Crouch – provides sampling and lab analysis services	(740) 537-2152
Name, Address and Title of Responsible Official	**Phone Number**
Michael Biasi, President Valley Converting Co Inc PO Box 279 Toronto, Ohio 43694	(740) 537-2152

C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached cover letter.

Aaron Pennington, Inspector, Ohio EPA, Southeast District Office — 8-13-07 Date

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office — 8/16/07 Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

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[2]		
e.	Treatment processes are as described in permit application/briefing memo		X[3]		
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			

Comments: [1] Both machines in operation during inspection.
[2] Flow monitoring for outfall is not setup properly and BOD_5 are not being refrigerated and seeded. No reported violation have been made. However once flow is properly measured and samples preserved, best professional judgement would lead one to believe that the loadings may not conform to the permit.
[3] Water being introduced to the process comes from more than just a well as was shown in the application flow diagram. Additionally, the Disc Filter (Moving Bed Filter) shown in the application is not in use. Sludge flow goes to saveall and reused.

F. COMPLIANCE SCHEDULES/VIOLATIONS

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

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained		Yes	No	N/A	N/E
a.	Standby power available: Generator plus portable generator and pumps		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: # of shifts: 3 Days/Week: 5-7			X	
e.	*Operator holds unexpired license of class required by permit Class:* N/A			X	
f.	Routine and preventive maintenance schedule/performed on time	X[1]			
g.	Any major equipment breakdown since last inspection		X		
h.	Operation and maintenance manual provided and maintained		X		
I.	Any plant bypasses since last inspection		X		
j.	Regulatory agency notified of bypasses: ____ on MORS ____ 800 Number			X	
k.	Any hydraulic and/or organic overloads experienced since last inspection		X[2]		

Comments: [1] New air distribution headers have been installed. Maintenance still necessary with flow meter.
[2] Possible, flow determination needs addressed to make a proper assessment.

Collection System		Yes	No	N/A	N/E
a.	Percent combined system: 0%			X	
b.	Any collection system overflows since last inspection (CSO ___ SSO ___)			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 portable gen.			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	

Comments:

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: clarifier sludge is reused; ragger and junker debris goes to landfill.	X[1]			
d.	If sludge is incinerated, where is ash disposed of?		X		
e.	Is sludge disposal contracted		X		
f.	Has amount of sludge generated changed significantly since last inspection				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?	X			

Comments: [1] Disc Filter (Moving Bed Filter) from application was not in use or even known about by on-site representatives. Sludge was being sent to saveall for reuse.

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement		Yes	No	N/A	N/E
a.	Primary flow measuring device properly operated & maintained. Type of device: _____ ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _X_ ultrasonic & weir _____ Runtime meter on Influent Pumps		X[1]		
b.	Calibration frequency adequate			X	
c.	Secondary instruments (totalizers, recorders etc.) properly operated and maintained			X	
d.	Flow measurement equipment adequate to handle expected ranges of flows		X[1]		
e.	Actual flow discharged is measured	X[1]			
f.	Flow measuring equipment inspection frequency: _X_ Daily _____ Weekly _____ Monthly _____ Other				

Comments: [1] Setup for meter and weir appears to have been modified with removal of a weir plate. Multiple undersized weirs were also shown in the flow meter house. Flow levels were continuous upstream to downstream on the weir which was currently being metered, thus the measurement could not accurately correlate the flow. The gravity discharge pipe was nearing capacity. Calibration will be necessary after modifying the flow monitoring setup. Keep a log of calibration dates with any relative notes.

Part 2 - Sampling		Yes	No	N/A	N/E
a.	Sampling location(s) are as specified by permit	X			
b.	Parameters and sampling frequency agree with permit	X			
c.	Permittee uses required sampling method		X[1]		
d.	Sample collection procedures are adequate		X[2]		
i.	Samples refrigerated during compositing		X[2]		
ii.	Proper preservation techniques used		X[1]		
	Conform with 40 CFR 136.3				
e.	Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records) Calibration logs are needing to be kept.	X			
f.	Adequate records maintained of sampling date, time, exact location, etc.				X[3]

Comments: [1] BOD_5 tests shall have a minimum reduction of 2.0 mg/L and 1.0 mg/L residual according to Standard Methods. Follow Standard Method's procedure ensuring adequate pH range, de-chlorinating, and most likely seeding the sample. Multiple dilutions are typical to ensure the accuracy of the results.

[2] Sampling refrigerator was filling while onsite, yet the unit was not refrigerating. There was no thermometer submersed in liquid to identify the temperature inside the sampler. A temperature should be recorded at the time of sampling into a log and/or chain of custody forms. The sampler should be maintained at 4°C (39-40°F).

3 Chain of Custody forms (a copy of) are recommended to be kept with the owner. Please understand that the NPES permit places the responsibility of monitoring on the owner.

The Monthly Operating Report may be signed by an appropriately designated operator by having the Owner's responsible official/party designate that operator in writing. Such correspondence shall be sent to the appropriate Ohio EPA office.

Part 3, Laboratory – General		Yes	No	N/A	N/E
a.	EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b.	If alternate analytical procedures are used, proper approval has been obtained			X	
c.	Analyses being performed more frequently than required by permit				X
d.	If (c) is yes, are results reported in permittee's self-monitoring report				X
e.	Commercial laboratory used 1. Parameters analyzed by commercial lab: Oil & Grease, Color, Cu, MBAS 2. Lab name: Alloway	X			

Comments: Harry Crouch works as an independent contractor and provides the additional testing – pH, Temp, TSS, and BOD_5. A copy of the most recent Discharge Monitoring Report Quality Assurance(DMRQA) is requested for each of the laboratory providers. It is recommended that the owner keep a copy of the most recent DMRQA to ensure the quality of reported data.

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained				X
g.	Satisfactory calibration and maintenance of instruments and equipment				X
h.	Adequate records maintained				X

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	Slight	Yes	None	Slight White	

K. MULTIMEDIA OBSERVATIONS

		Yes	No	N/A	N/E
a.	Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b.	Do you notice staining or discoloration of soils, pavement, or floors		X		
c.	Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d.	Do you see unidentified dark smoke or dustclouds coming from sources		X		
e.	Do you notice any unusual odors or strong chemical smells		X		
f.	Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities?		X		

Comments: Machine areas were relatively clean. Industrial operations are inclusively under roof. Raw and finished materials are stored under roof. Chain-link fencing with blinders have been installed since last inspection. "Boneyard" is located adjacent to treatment facility and appeared to be the only exposure source during the inspection.