Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 29, 2011

Re: Lawrence County
McGinnis, Inc.
Village of South Point
Compliance Inspection
IDP No. 0DP00056*AP
Pretreatment

Ms. Rebekah Waugh, Risk Manager
McGinnis, Inc.
P.O. Box 534
502 Second Street Extension
South Point, Ohio 45680

Dear Ms. Waugh:

On October 13, 2011, I conducted a compliance inspection at McGinnis, Inc. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and Lee Walls, Cleaning Fleet Supervisor, represented McGinnis during the inspection.

General Facility Description

McGinnis performs harbor barge transfer service, tow boat and barge repair, barge cleaning, crane service, and flammable gas testing and removal. Operations may also include fabrication, machining, welding and painting of marine equipment.

Wastewaters are generated from barge cleaning, barge washing, residuals storage contact water, and tow boat bilge pumping.

Cleaning water and water from a residuals accumulation barge are pumped to a storage barge for settling. Water from the storage barge is pumped to the sewer through a flexible line. Sludge from the storage barge is disposed in batch at Green Valley Landfill or Big Run Landfill in Ashland, Kentucky.

Bilge and other oily wastewaters are accumulated in a tanker barge prior to treatment. The wastewater is treated to remove oil using a heating system for emulsion breaking followed by a coalescing oil separator before discharging to the South Point sewer. Recovered oil is transported off site by United Wastewater Service of Cincinnati.

The oily waste treatment system was discharging during the inspection. There was no discharge of the fleet cleaning water during the inspection.

McGinnis is regulated as a noncategorical significant industrial user by Ohio EPA. McGinnis holds an effective Ohio EPA IDP, which became effective December 1, 2010.

Required Actions

1. McGinnis' IDP specifies reporting units for each parameter. Please ensure that all parameters are reported in the correct units on effluent monitoring reports. McGinnis may need to convert the results from the units reported by the lab prior to reporting results to Ohio EPA. Please review all current reports, and submit corrected reports if any incorrect units were reported.

2. The IDP requires McGinnis to collect composite samples for all but two (2) pollutant parameters at both outfalls. Composite samples are defined as a combination of individual samples collected at periodic intervals of the entire discharge day. For Outfall 002, McGinnis collects grab samples from the final compartment of the storage barge prior to discharge, which appears representative due to the large storage volume available in the barge. For Outfall 001, McGinnis should collect a series of grab samples throughout the discharge day and combine them into a manual composite sample to ensure that the samples are representative.

3. Part III, Paragraph 4 of the IDP requires that samples be collected and analyzed in accordance with 40 CFR 136. Samples should be refrigerated or kept on ice during collection, storage and shipping to maintain a sample temperature of less than 6 degrees Celsius. A summary of holding times and preservation methods is attached for your information. Manual composite samples should be refrigerated or kept on ice after collection and before and after compositing. Samples are shipped to Belmont Laboratories in Englewood for analysis using a courier service. McGinnis should have its contract laboratory record the sample temperature on all chain of custody forms to document whether the samples were at the proper temperature upon arrival at the lab.

4. McGinnis reported the following exceedances of effluent limits between January 2010 and July 2011:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00402	pH, Minimum	1D Conc	5.0	4.87	4/22/2011
002	01092	Zinc, Total (Zn)	30D Conc	4500	5240	2/1/2011

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your Indirect Discharge Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please investigate the reasons for the above referenced violations, and provide a description of the actions taken or proposed to prevent further violations.

Comments

McGinnis operates three (3) separate facilities near South Point. Only the Second Street facility currently discharges process water to the South Point sewer. The Ohio River Docks facility in Coal Grove serves as a coke storage and transfer facility and holds an Ohio EPA NPDES permit 0IL00024*ED. The Sheridan Shipyard at 739 County Road 1 performs barge repair and painting. Discharges from the shipyard facility are covered under the Industrial Stormwater General Permit OHR000004, 0GR00390*DG.

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

Sincerely,

Fred J. Snell

Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

c: Patrick Leighty, Village Administrator, Village of South Point
c: Steve Wells, DSW, SEDO
c: Pretreatment Unit, DSW, CO

Pretreatment
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0DP00056*AP	OHP000241	October 31, 2011	6	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
McGinnis, Inc. 502 Second Street Extension P.O. Box 534 South Point, Ohio 45680	11:00 a.m.	July 1, 2011
	Exit Time	**Permit Expiration Date**
	2:00 p.m.	November 30, 2015

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Rebekah Waugh, Risk Manager	(740) 377-4391
Name, Address, & Title of Responsible Official	**Phone Number**
Bruce D. McGinnis, CEO	(740) 377-4391

C. AREAS EVALUATED DURING INSPECTION

S	Permit	S	Flow Measurement	S	Pretreatment
M	Records/Reports	S	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal		Other
S	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 — Date 12/29/11

Jennifer M. Witte

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date 12/29/11

General Lab Criteria

Notation of Referenced Method

1	Method 9020-B, Item 4	14	Method 1060A, Item 1
2	Method 1020-A, Item 1	15	Method 4500-Cl I, Item 2
3	Method 1020-B, Item 10	16	Method 4500-Cl I, Item 4
4	Method 2540-B, Item 2	17	Method 4500-NH3 D, Item 4
5	Method 2550-B, Item 1	18	Method 4500-NH3 D, Item 2
6	Method 1020-B, Item 1	19	Method 1060-B, Item 2
7	Method 4500-H B, Item 4	20	Method 1060-B, Item 1
8	Method 4500-H B, Item 2	21	Method 9222D, Item 1
9	Method 1020-B, Item 2	22	Method 9223 B, Item 2
10	Method 4500-O B, Item 3	23	Method 9223 B, Item 3
11	Method 4500-O G, Item 3	24	Method 1603, Item 2
12	Method 5210-B, Item 5	25	Method 9030-B, Item 3
13	CFR 136.3, Table II	26	Method 9020 B, Table IV

Equipment Logbook Content - all maintenance performed on a piece of equipment should be documented in the logbook. This should include parts replacement and routine maintenance activities. Entries should include date, maintenance performed and initials of person making entry.

Preservation and Holding Times

Parameter	Container	Min. Sample Size (mL)	Sample Type	Preservation	Maximum Storage Time	
					Recommended	Regulatory
BOD / CBOD	P, G	1000	G, C	Refrigerate ≤6° C	6h	48h
TSS	P, G	200	G, C	Refrigerate ≤6° C	7 d	7 d
pH	P, G	50	G	Analyze immediately	0.25h	0.25 h
NH3-N	P, G	500	G, C	Analyze as soon as possible or add H_2SO_4 to pH <2, Refrigerate ≤6° C	7 d	28 d
TRC	P, G	500	G	Analyze immediately	0.25h	0.25 h
DO (electrode)	G, BOD Bottle	300	G	Analyze immediately	0.25h	0.25 h
Temperature	P, G	--	G	Analyze immediately	0.25h	0.25 h
Metals, general	P, G	1000	G, C	For dissolved filter immediately and add HNO_3 to pH <2	6 months	6 months
Purgeables by purge and trap	G (PTFE lined lid)	40 (X2)	G	HCl to pH<2, Refrigerate ≤6° C	7 d	14 d
Base/Neutrals and acids	G (solvent rinsed or baked)	1000	C, G	Refrigerate ≤6° C	7 d	7 days until extraction 40 days after extraction
Pesticides	G (PTFE lined lid)	1000	C	Refrigerate ≤6° C	7 d	7 days until extraction 40 days after extraction
Fecal Coliform / E-Coli	G, P (Sterilized)	100	G	Refrigerate ≤10° C If chlorine present, add sodium thiosulfate tablet	6 hrs transport Start analysis within 2 hrs of receipt in lab.	
Oil and Grease	G	1000	G	HCl or H_2SO_4 to pH <2, Refrigerate ≤6° C	28 d	28 d