



**Environmental
Protection Agency**

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

February 28, 2012

Tom Schwing, Operations Manager
Ohio American Water Co Huber Ridge WWTP
5481 Buenos Aires Boulevard
Westerville, OH 43081

**Re: Ohio American Water Co Huber Ridge WWTP
NPDES Permit 4PU00000/ OH0036013
Compliance Evaluation Inspection
Franklin County**

Dear Mr. Schwing:

On January 24, 2012, a Compliance Evaluation Inspection was conducted at the Ohio American Water Co Huber Ridge WWTP. Present for the inspection were Brian McFarland and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

Findings

1. Compliance and flow tables are attached for the time period between November 2010 to January 2012. The facility has largely been compliant and has been responsive to the one limit violation which occurred during the review period. The average flow rate is less than the design flow rate but the peak flow rate was approximately four times the average flow rate. Due to the facility being largely compliant, Ohio EPA is satisfied with how you are addressing inflow and infiltration.
2. I reviewed the log book for the week of January 8, 2012. During that week, the Operator of Record was on-site for approximately 33 hours. A Class III waste water treatment works plant requires an operator on-site for 40 hours a week. During the next permit renewal, you will be required to meet the staffing requirement.

Once the permit is renewed, you may be eligible for staffing reduction based on staffing or continuous monitoring. You can find the form to reduce the hours on our website here:

<http://www.epa.state.oh.us/dsw/opcert/opcert.aspx>

Tom Schwing, Operations Manager
Ohio American Water Co Huber Ridge WWTP
Page -2-

Attached is the Compliance Evaluation Inspection checklist. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.ohio.gov.

Sincerely,

Handwritten signature of Cole Miller in cursive script.

Cole Miller
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

ec: Cole Miller

CM/hsm 1-24-12 CEI Huber Ridge WWTP

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PU00000	OH0036013	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
1/24/2012	9:00 AM	10:45 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Ohio American Water Co Huber Ridge WWTP	1/1/2009
	Permit Expiration Date
	12/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Brian McFarland	(614) 882-6586
Name and Title of Responsible Official	Phone Number
Tom Schwing, Operations Manager	(614) 882-6586

SECTION C: AREAS EVALUATED DURING INSPECTION	
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated	
S	NPDES Compliance
S	Operations & Maintenance
S	Facility Site Review
S	Collection System
S	Flow Measurement
S	Receiving Waters
S	Laboratory

Comments: The treatment plant appeared to be operating efficiently and the effluent from the post-aeration tank looked like a well-treated effluent.

Signatures	
 2/10/12	 2/13/12
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Ohio American Water Co Huber Ridge WWTP between 11/1/2010 to 1/1/2012

Summary

Permit Effluent Limit Violations: 1

Permit Effluent Code Violations: 1

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2011	001	Total Suspended Solids	7D Qty	175	225.978	3/8/2011

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
May 2011	001	Fecal Coliform	AK	5/3/2011

Flow Data for Ohio American Water Co Huber Ridge WWTP between 11/1/2010 and 1/1/2012

	Date	Flows (MGD)
Ten Highest Flows	12/5/2011	2.991
	3/5/2011	2.719
	3/9/2011	2.459
	5/3/2011	2.414
	4/4/2011	2.383
	4/19/2011	2.312
	3/4/2011	2.037
	11/28/2011	1.951
	3/10/2011	1.941
	4/20/2011	1.939
Average Flow Rate		0.722

SECTION D: PERMIT VERIFICATION

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters Y
- (c) Products and production rates conform with permit application Y
- (d) Flows and loadings conform with NPDES permit Y
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process added since last inspection N
- (g) Notification given to State of new, different or increased discharges Y
- (h) All discharges are permitted Y
- (i) Number and location of discharge points are as described in permit Y

Comments:

SECTION E: COMPLIANCE

- (a) Any significant violations since the last inspection N
- (b) Permittee is taking actions to resolve violations Y
- (c) Permittee has a compliance schedule Y
- (d) Permittee is meeting compliance schedule Y

Comments:

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? Generator
- (b) Adequate alarm system available for power or equipment failures Y
- (c) All treatment units in service other than backup units Y
- (d) Wastewater Treatment Works classification III
- (e) Operator of Record holds unexpired license of class required by Permit Y
Class held: III
- (f) Copy of certificate of Operator of Record displayed on-site Y
- (g) Minimum operator staffing requirements fulfilled Y*
- (h) Routine and preventative maintenance scheduled and performed Y
- (i) Any major equipment breakdown since last inspection N
- (j) Operation and maintenance manual provided and maintained Y*
- (k) Any plant bypasses since last inspection N
- (l) Regulatory agency notified of bypasses N/A
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection N

Comments: Facility has operator on-site for 5 days but the 40 hour requirement was not met during January 8 – January 14. A future staff reduction request is likely possible due to operations.

The maintenance manual is in place at Blacklick Estates and is almost done at Huber Ridge.

SECTION G: RECORD KEEPING

- a) Log book provided..... Y
- b) Format of log book (i.e. computer log, hard bound book)
Hard bound book
- c) Log book(s) kept onsite in an area protected from weather..... Y
- d) Log book contains the following:
 - i) Identification of treatment works..... Y
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 Y
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) Y
 - iv) Laboratory results (unless documented on bench sheets)..... Y
 - v) Identification of person making log entries Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred?.... Y

Comments:

SECTION H: COLLECTION SYSTEM

- a) Percent combined system: 0
- b) Any collection system overflows since last inspection Y
 CSO SSO Y
- c) Regulatory agency notified of overflows Y
- d) CSO O&M plan provided and implemented..... N/A
- e) CSOs monitored and reported in accordance with permit N/A
- f) Portable pumps are used to relieve system..... N
- g) Lift station alarms provided and maintained Y
- h) Lift stations equipped with permanent standby power or equivalent Y
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N
- j) Any complaints received since last inspection of basement flooding N
- k) Are any portions of the sewer system at or near capacity N
- l) Are operations changed during high-flow events?..... Y*

Comments: Facility has three clarifiers which can be placed in service during high flows. Facility also can turn off the blowers during high flows but has not done so during the time period inspected.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP)
Submitted Date: Approval #: Not submitted N/A
- b) Sludge management plan current N/A
- c) Sludge adequately disposed Y
 Method: Landfill
- d) If sludge is incinerated, where is ash disposed of N/A
- e) Is sludge disposal contracted
 Name: Hauls to SWACO
- f) Has amount of sludge generated changed significantly N
- g) Adequate sludge storage provided at plant Y
- h) Land application sites monitored and inspection per SMP N/A
- i) Records kept in accordance with State and Federal law Y
- j) Any complaints received last year regarding sludge N
- k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments:

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained Y
 Type of device: Parshall Flume Device location: Prior to chlorination
- b) Calibration frequency adequate..... Y
 Date of last calibration: May 13, 2011
- c) Secondary instruments operated and maintained Y
- d) Flow measurements equipment adequate to handle full range of flows Y
- e) Actual flow discharged is measured Y
- f) Flow measuring equipment inspection frequency
- g) Sampling location(s) are as specified by permit Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) Y

Comments:

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) Y
- b) If alternate procedures are used, are they properly approved? Y
- c) Analysis performed more frequency Y
 If yes, are results recorded in permittee's report? Y
- d) Commercial laboratory used: Yes
 Name: Alloway
 Parameters analyzed: TKN, NO₃, NO₂, metals
- e) Quality assurance manual provided and maintained Y
- f) Calibration and maintenance of instruments is satisfactory? Y
- g) Results of last U.S. EPA quality assurance Y
 Date: 3/14/2011

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	No	No	No	No	No	Clear	

Comments:

SECTION M: MULTIMEDIA OBSERVATIONS

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- b) Do you notice staining or discoloration of soils, pavement or floors N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- e) Do you notice any unusual odors or strong chemical smells N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: