



Environmental
Protection Agency

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

April 10, 2012

Mr. Steve Aviles, Manager of Mechanical Systems
Cedarville University
251 North Main Street
Cedarville, Ohio 45314

**RE: Cedarville University Water Plant Wastewater Treatment System
NPDES Permit No. 11Y00023*BD; OH0085502
NPDES Compliance Inspection**

Dear Mr. Aviles:

On March 22, 2012, Michelle Waller and I conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection at your facility. As the inspection was unscheduled, no prior contact was made nor did I meet with Paul Mitchell or Mike Blosser. The purpose of the inspection was to evaluate the operation and performance of the filter backwash wastewater treatment sedimentation basin and to determine compliance with the monitoring requirements of the NPDES permit.

As part of the inspection, aspects of the facility's operations are evaluated with regards to compliance with the terms and conditions of the NPDES permit. These areas and their ratings (i.e. satisfactory, marginal, and unsatisfactory) are included in the attached report (Section C.). Three categories received "Marginal" ratings, including Self-monitoring Program, Effluent/Receiving Waters, and Other (outfall sign). The marginal rating for Effluent/Receiving Waters was due to the five violations of final effluent limits for pH over the past approximately two years. Self-monitoring Program was rated marginal as a result of the numerous instances where the parameters listed in the NPDES permit have not been measured and reported as frequently as required by the permit. Finally, an outfall marker (sign) has not been installed on the bank of the stream at the outfall as required by Part II, Item G of the NPDES permit (page 4 of the permit). Additional information is included in the attached report.

If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,

Michael W. Zimmerman
Permits and Compliance Group
Division of Surface Water

Enclosure

cc: Paul Mitchell, Cedarville University

MWZ\bp

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov



NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number 11Y00023*BD	NPDES Number OH0085502	Inspection Date 3/22/2012	Inspection Type CEI	Inspector S	Facility Type 2
-------------------------------------	----------------------------------	-------------------------------------	-------------------------------	-----------------------	---------------------------

Section B: Facility Data

Name and Location of Facility Inspected: Cedarville University Water Treatment Plant 251 N. Main Street Cedarville, OH 45314	Entry Time 12:00 pm	Permit Effective Date March 1, 2010
	Exit Time 12:30 pm	Permit Expiration Date February 28, 2015
	Name(s) and Titles of On-Site Representative(s) Steve Aviles, Manager of Mechanical Systems Paul Mitchell, Supervisor of Water Systems	
Name, Title and Address of Responsible Official: Steve Aviles, Manager of Mechanical Systems		Phone Number / e-mail address 937-768-7775 937-766-3204 Phone Number same

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable, NE = Not Evaluated)

S	Permit
S	Records/Reports
S	Operations & Maintenance
S	Facility Site Review
M	Self-monitoring Program

S	Flow Measurement
S	Laboratory
M	Effluent/Receiving Waters
NA	Sludge Storage/Disposal

NA	Pretreatment
NA	Compliance Schedules
NA	Collection System
M	Other (outfall sign)

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

There was no overflow discharge from the "red water" treatment sedimentation basin at the time of the inspection. The basin was relatively clear with a few cattails growing along the edges.

The end of the outfall pipe at the receiving stream (unnamed tributary of Massie Creek) could not be located due to overgrown vegetation. In addition, an outfall marker (sign) has not been posted on the bank of the stream at the outfall as required by Part II, Item G of the NPDES permit (page 4 of the permit).

Review of your electronic Discharge Monitoring Reports from January, 2010, through March, 2012 revealed both violations of numeric final effluent limitations and measuring frequencies. These are listed on the attached sheet.

Name and Signature of Inspector(s) Michael Zimmermann	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6102	Date 4-10-2012
Name and Signature of Reviewer(s) Martyn G. Buft	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 4/10/2012

Final Effluent Limitation Violations:

(Period of review: Jan., 2010 thru March, 2012)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2010	pH	1D Conc	9.0	9.5	4/5/2010
May 2010	pH	1D Conc	9.0	11.3	5/3/2010
January 2011	pH	1D Conc	6.5	6.4	1/25/2011
February 2011	pH	1D Conc	6.5	6.	2/17/2011
June 2011	pH	1D Conc	6.5	6.1	6/29/2011

Measuring Frequency Violations:

There have been numerous instances where the parameters listed in the NPDES permit have not been measured as frequently as required by the permit. The measuring frequency for the flow rate of the final effluent is once a day. The measuring frequency for the other parameters (pH, TSS, Suspended Fe, and Suspended Mn) is once every two weeks. If there is no overflow discharge from the sedimentation basin at the time of the required sampling and measurement, a data substitution code (“A” code) must be entered into the discharge monitoring report (eDMR).

Items Requiring Corrective Actions:

1. Part II, Other Requirements, Item G of the NPDES permit states: *“Not later than 4 months from the effective date of this permit, the permittee shall post a permanent marker on the stream bank at each outfall that is regulated under this NPDES permit and discharges to the unnamed tributary of Massie Creek”*. Therefore, the outfall sign should have been installed by July 1, 2010. Within 30 day of receipt of this letter, Cedarville must install the required outfall sign as designated in the NPDES permit.
2. Cedarville University must report monitoring data for the final effluent as required by Part I, A. of the permit.
3. Part III, General Requirements, No. 12 (Noncompliance Notification) of the NPDES permit contains states: *“The permittee shall report noncompliance that is the result of any violation of a daily maximum discharge limit for any of the pollutants listed by the Director in the permit by e-mail or telephone with twenty-four (24) hours of discovery”*. When there is a violation such as the pH violations listed above, Cedarville University must contact Ohio EPA as stated in this requirement.