



Environmental
Protection Agency

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

April 12, 2012

Joel McGuire, Mayor
City of Harrison
300 George Street
Harrison, Ohio 45030

**RE: Compliance Evaluation Inspection
Harrison WWTP
NPDES Permit 1PC00002*ID**

Dear Mayor McGuire:

On March 20, 2012, I met with Jim Leslie, Bob Haas, Bryan Warders and Gene Allen to conduct a compliance evaluation inspection at the Harrison Wastewater Treatment Plant due to an ongoing plant upset. A copy of my inspection report is attached.

Due to the significant non-compliance with the effluent limits noted in the summary of findings, a response to this inspection is requested by April 27, 2012. Harrison should provide a schedule to outline actions it plans to take to address the prevention of plant upsets from the grease contained in the influent wet well including any operational or process control improvements. If you have any questions regarding the inspection or the report, please call me at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

MO/ca

Enclosure

ec: Jim Leslie, Operator of Record, Harrison Utilities Director
David Vicarel, Arcadis
Chris Griffith, Hamilton County Public Health
Bill Fischbein, Ohio EPA, Legal



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PC00002*ID	OH0021440	3/20/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Harrison WWTP 10999 Campbell Road Harrison, Ohio	10:00 am	August 1, 2008
	Exit Time	Permit Expiration Date
	11:00 am	January 31, 2013
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Jim Leslie, Director of Utilities, Operator of Record Bryan Warders, Operator of Record Gene Allen, Operator Bob Haas, Operator		(513) 367-3725
Name, Address and Title of Responsible Official		Phone Number
Joel McGuire, Mayor City of Harrison 300 George Street Harrison, Ohio 45030		(937) 367-2111

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
N	Permit	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	U	Effluent/Receiving Waters	N	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
See end of report for Summary of Findings.			
Inspector		Reviewer	
Date		Date	
4/12/2012		4/12/2012	
Mary Osika Environmental Specialist Division of Surface Water Southwest District Office		Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification – N/E

Section F: Compliance

- (a) Any permit violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES Permit Compliance Schedule
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Harrison is not in compliance with administrative orders for meeting effluent limits. See summary of findings at end of report.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
 - i. What does the back-up power source operate.....
 - ii. How often is the generator tested under load.....
- (b) Which components have an alarm system available for power or equipment failures.....
- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... Y

- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... N
- (h) Any plant upsets since last inspection..... Y

Comments/Status:

(h) The Harrison wastewater treatment plant is experiencing a plant upset due to emulsified grease from wet well.

Record Keeping/Operator of Record: N/E

Collection System: N/E

Section H: Sludge Management – N/E

Section I: Self-Monitoring Program – N/E

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: slightly turbid

Receiving Stream: Whitewater River

Receiving Stream Description: No noticeable impact.

Comments/Status:

As usual, a small school of fish was observed in effluent discharge plume.

Section K: Multimedia Observations – N/E

Section D: Summary of Findings

Harrison WWTP has been undergoing a plant upset, resulting in weekly effluent limit violations of Total Suspended Solids and most likely the monthly average limit. Harrison believes the cause of the upset is solvent from a garment washing facility discharging higher than normal concentrations (they noticed strong odors in the wet well) that emulsified the grease contained in the influent wet well and upset the oxidation ditches and settling process. The grease may have produced a condition for filamentous bacteria to grow excessively.

Harrison was actively working on sampling the effluent from the garment washer (looking at TTO scan) and meeting with the company to change their solvent product to one that will not cause interference of their treatment system.

Harrison has been in significant non-compliance with the ammonia nitrogen effluent limits from May 2011 – October 2011. It appears they will also be in significant non-compliance with the Total Suspended Solids limits from October 2011 – March 2012. Due to the effluent limit violations Harrison is in non-compliance with the Administrative Orders issued in February 2011. See summary of effluent limit violations below.

Harrison was notified during the inspection that Ohio EPA has enacted expedited compliance and enforcement procedures. Harrison intends to continue to work with the garment washer to prevent the industrial wastewater interference. Harrison intends to submit a PTI for the Oxyphogg grease oxidation system soon. Harrison will look into contacting the Wastewater Technical Assistance Group in Central Office to aid in their process control.

Summary of Effluent Limit violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.08615	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.17	5/8/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.78083	7/1/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	6.48333	7/22/2011
October 2011	001	00530	Total Suspended Solids	7D Conc	18	18.3333	10/1/2011
October 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.29167	10/1/2011
October 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.90333	10/1/2011
October 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.63333	10/8/2011
November 2011	001	00530	Total Suspended Solids	7D Conc	18	18.1666	11/8/2011