



Environmental
Protection Agency

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

May 24, 2012

Mr. Chris Brausch
Warren County Sanitary Engineer
Warren County Water and Sewer Department
406 Justice Drive, P.O. Box 530
Lebanon, Ohio 45136

**RE: WARREN COUNTY LOWER LITTLE MIAMI WWTP COMPLIANCE
EVALUATION INSPECTION, NPDES PERMIT NO. OH0071692, OEPA
PERMIT NO. 1PK00018*JD**

Dear Mr. Brausch:

On May 17, 2012, I conducted an NPDES Compliance Evaluation Inspection at the above referenced facility. Greg Squire, Operator of Record, and Eric Haddix, Operator, were present. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

Phase III construction is mostly complete. Minor details such as reseeding and the entrance gate are still being worked on. SCADA is not operational yet. Otherwise, all new treatment components are operational.

All areas that were evaluated received a satisfactory rating. **Please pay attention to the "Items Requiring Correction" (shown in bold type) within the report.** A copy of the inspection report is enclosed.

If you have any questions, please contact me by phone at (937) 285-6028 or by email at michelle.waller@epa.state.oh.us.

Respectfully,

Michelle Waller
Environmental Specialist II
Division of Surface Water

Enclosures

ec: Greg Squire, Lower Little Miami WWTP

MWbpb



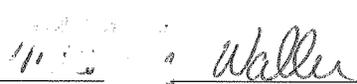
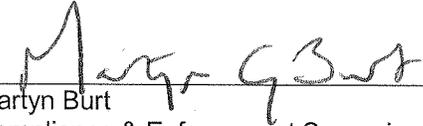
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PK00018*JD	OH0071692	05/17/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Warren County Lower Little Miami WWTP 2086 West U.S. Route 22 & 3 Maineville, Ohio 45039	9:45 AM	8/1/2011
	Exit Time	Permit Expiration Date
Mailing: P.O. Box 350, 406 Justice Drive, Lebanon, OH 45036	12:15 PM	12/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Squire – Chief Operator, Class IV Eric Haddix – Operator, Class II Mike Carter - Operator, Collections System	(513) 683-5808 (513) 509-2088	
Name, Address and Title of Responsible Official	Phone Number	
Chris Brausch, P.E., Sanitary Engineer	(513) 695-1377	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Please see attached report.	
Inspector	Reviewer
 Michelle Waller Division of Surface Water Southwest District Office Date: 5/24/12	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 5/24/12

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

Inspection observations verify the permit

- | | |
|--|---|
| (a) Correct name and mailing address of permittee | Y |
| (b) Flows and loadings conform with NPDES permit..... | Y |
| (c) Treatment processes are as described in permit application... | Y |
| (d) All discharges are permitted..... | Y |
| (e) Number and location of discharge points are as described
in permit..... | N |
| (f) Storm water discharges properly permitted..... | Y |

Comments/Status:

(e) – Outfall 001 was moved approximately 50 feet as part of the plant upgrade. New GPS coordinates will be submitted to Ohio EPA.

Section F: Compliance

- | | |
|---|-----|
| (a) Any significant 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..... | N |
| (e) Compliance schedule contained in...N/A | |
| (f) Permittee is in compliance with schedule..... | N/A |
| (g) Has biomonitoring shown toxicity in discharge since last inspection | N |

Comments/Status:

One violation was report September 2011 for E. coli, and proper Non-Compliance Notification was given.

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.....
- There are 2 generators, a large one up front, and a small one in back. Everything at the plant can be operated by the generators.
- ii. How often is the generator tested under load.....
- The generator is tested under load every 4-6 weeks. The large new generator is auto programmed to run weekly checks.
- (b) Which components have an alarm system available for power or equipment failures.....
- All components have alarms.
- (c) All treatment units in service other than backup units..... N
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....
- Software – a calendar on the computer.
- (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..... N

Comments/Status:

(c) – Only VLR 3 (the newly added VLR) is currently in service. VLR 1 and 2 are being rehabbed. VLR 1 has had the turning veins replaced. VLR 2 is having the shafts and bearings replaced. VLR 3 has had no problems handling all of the flows even in rain events. VLR 3 is almost the size of VLRs 1 and 2 combined. VLR 3 can handle up to 30 MGD.

Clarifiers 1-4 are not being used (painting the bridging structure), but are ready to be put online if needed.

(h) No plant upsets since VLR 3 (the new plant) came online.

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... IV
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hard bound book with consecutively numbered pages.
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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 operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... N
 - v. Identification of person making entries..... N
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

(j)(iii) – This information is kept on log sheets as well.

(k) Operator of Record does not put his initials in the log book when making entries. Whenever anyone fills in for the Operator of Record, they record their initials.

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....13
 - ii. How many pump stations have telemetered alarms.....All
 - iii. How many pump stations have operable alarms.....All

- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N
- (d) Are there CSOs in the collection system..... N
if so, what is the LTCP status.....
- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....
- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... Y
- (h) Any WIB complaint received since last inspection..... Y
- (i) Is there a WIB response plan..... Y
- (j) Is any portion of the collection system at or near dry weather capacity..... N

Comments/Status:

- (i) Three more will be equipped this year.
 - (h) WIB complaints this year were on February 21, 2012 and April 17, 2012.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
(see GLC page)
- (d) 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/Status:

The lab supervisor is Jon Collins:(513) 583-3091. (jon.collins@co.warren.oh.us)

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable..... Y
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of know precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y

- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: metals, total phosphorus, low level Hg, TDN, NO₃-NO₂.

Lab name: Belmont Labs

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
Date: 2/2011
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Final effluent.

Receiving Stream: Unnamed tributary of Simpson Creek to Little Miami River at RM 28.14.

Receiving Stream Description:

Comments/Status:

The final outfall pipe has been moved approximately 50 as part of the new construction. Lower Little will get the new GPS coordinates and submit them to OEPA so the permit outfall location can be update.

Section K: 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/Status:

Items Requiring Correction

1. Ohio Administrative Code 3745-7-09 (A)(3)(f) –This section of the OAC deals with *recordkeeping requirements and responsibilities of a certified operator*, and states that the person making entries into the operators logbook must identify themselves. The logbook at Lower Little Miami WWTP only has names listed when someone is filling in for the Operator of Record. Although it is clear all of the other handwriting belongs to one person and the Operator of Record stated they were his entries, please start having everyone who writes in the logbook put either their full name or initials if the initials are spelled out somewhere in the logbook.
2. Within 14 days of receiving this report, submit the new GPS coordinates for the outfall.