Ohio | Environmental Protection Agency

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

June 27, 2012

Mr. Michael Ponzani
Assistant General Counsel
MPW Industrial Services
PO Box 10
Hebron, OH 43025

Re: **MPW Industrial Services**
NPDES Permit 4IN00184/ OH0124401
Compliance Evaluation Inspection
Licking County
Notice of Violation

Dear Mr. Ponzani:

On June 12, 2012, a Compliance Evaluation Inspection was conducted at MPW Industrial Services. Present for the inspection were yourself, Scott Hiles, and Joe Hickman representing MPW Industrial Services 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. This letter is also to notify you that you continue to be in significant non-compliance with your NPDES permit. The following findings and observations were made during the inspection:

- Permit limit violations continue to be unacceptable. MPW shall continue to investigate the problems with elevated ammonia concentrations in the effluent as easement negotiations and construction of sewers occurs.

- One solution to the elevated ammonia problem may be to add alkalinity to the wastewater. If alkalinity is too low, this may be inhibiting nitrification.

- The company is continuing to negotiate with the lone property owner who has yet to agree to an easement for the land to complete the sewer connection to the Licking County, Buckeye Lake facility. All other property owners of concern have negotiated easements for the preferred routing of the sewer.

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- The lack of compliance at the facility demands timely action to facilitate construction of the sewer connection whether or not an easement for the preferred route is available. As discussed during the inspection, MPW shall submit a new Permit to Install (PTI) to allow for rerouting of the sewer connection so that the project might move forward to eliminate the current non-compliant discharge if the easement negotiations remain unproductive. The facility should plan to begin construction of the sewer no later than October 31, 2012. Therefore, a new PTI should be submitted to the Ohio EPA in a timely fashion (e.g., end of August, beginning of September 2012) to allow for work to begin on or before that date.

- The company shall provide a monthly progress report on the status of the sewer project to Paul Vandermeer on the first business day of each month until the sewer has been constructed and the tie-in to county sewers is completed. Once the company is tied into the public sewer, there will need to be a final inspection of the facility to confirm connection and decertify the NPDES permit.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely,

Paul L. Vandermeer
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Paul L. Vandermeer

PLV/nsm MPW NOV

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00184	OH0124401	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
6/12/2012	11:00 AM	12:05 PM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
MPW Industrial Services 9711 Lancaster Rd., SE Hebron, OH 43025	6/1/2007 Permit Expiration Date 5/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Joe Hickman, Operator Scott Hiles, Maintenance Supervisor	(740) 814-7342 (740) 819-3168
Name and Title of Responsible Official	Phone Number
Michael Ponzani, Assistant General Counsel	(740) 927-8790

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U*	NPDES Compliance	Ammonia violations are problematic.
S	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
M*	Flow Measurement	Calibrate by October 31, 2012 if sewer construction has not begun.
N	Receiving Waters	
N	Laboratory	MASI Laboratory performs all but Cl, D.O., and Temp.

Comments: *See the findings and observations in the cover letter.

Signatures			
6/21/12		6/21/12	
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

Compliance Data for MPW Industrial Services between 7/1/2010 to 6/1/2012

Summary
Permit Effluent Limit Violations: 70
Permit Effluent Code Violations: 0
Permit Effluent Frequency Violations: * 3
Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	001	Chlorine, Total Residu	1D Conc	0.019	.05	8/4/2010
September 2010	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	5.1	9/1/2010
September 2010	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.0193	9/1/2010
September 2010	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	5.1	9/19/2010
October 2010	001	Total Suspended Solids	30D Conc	12	18.	10/1/2010
October 2010	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	18.2	10/1/2010
October 2010	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.06889	10/1/2010
October 2010	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	18.2	10/24/2010
October 2010	001	Nitrogen, Ammonia (NH3	1D Qty	0.020	.06889	10/24/2010
December 2010	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.8	12/1/2010
December 2010	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.8	12/12/2010
January 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.6	1/1/2011
January 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.04088	1/1/2011
February 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	14.8	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.05602	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	14.8	2/27/2011
March 2011	001	Total Suspended Solids	30D Conc	12	15.	3/1/2011
March 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	9.4	3/1/2011
March 2011	001	CBOD 5 day	30D Conc	10	11.	3/1/2011
March 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	9.4	3/20/2011

April 2011	001	Total Suspended Solids	30D Conc	12	16.	4/1/2011
April 2011	001	Total Suspended Solids	30D Qty	0.16	.18168	4/1/2011
July 2011	001	Total Suspended Solids	30D Conc	12	21.	7/1/2011
July 2011	001	Total Suspended Solids	1D Conc	18	21.	7/17/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	6.9	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.07835	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	6.9	8/17/2011
August 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.020	.07835	8/17/2011
September 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	14.4	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.0545	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	14.4	9/25/2011
September 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.020	.0545	9/25/2011
October 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	21.6	10/1/2011
October 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.08176	10/1/2011
October 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	21.6	10/9/2011
October 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.020	.08176	10/9/2011
November 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	87.1	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.65935	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	87.1	11/22/2011
November 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.060	.65935	11/22/2011
December 2011	001	Total Suspended Solids	30D Conc	12	14.	12/1/2011
December 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	29.7	12/1/2011
December 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.05621	12/1/2011
December 2011	001	CBOD 5 day	30D Conc	10	24.	12/1/2011
December 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	29.7	12/26/2011
December 2011	001	CBOD 5 day	1D Conc	15	24.	12/26/2011
January 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	30.15	1/1/2012
January 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.22824	1/1/2012
January 2012	001	CBOD 5 day	30D Conc	10	13.	1/1/2012
January 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	23.9	1/5/2012
January 2012	001	Nitrogen, Ammonia (NH3	1D Qty	0.060	.18092	1/5/2012

January 2012	001	CBOD 5 day	1D Conc	15	17.	1/5/2012
January 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	36.4	1/19/2012
January 2012	001	Nitrogen, Ammonia (NH3	1D Qty	0.060	.27555	1/19/2012
February 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	24.9	2/1/2012
February 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.18849	2/1/2012
February 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	24.9	2/2/2012
February 2012	001	Nitrogen, Ammonia (NH3	1D Qty	0.060	.18849	2/2/2012
March 2012	001	Total Suspended Solids	30D Conc	12	18.5	3/1/2012
March 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	87.3	3/1/2012
March 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	44.05	3/1/2012
March 2012	001	Nitrogen, Ammonia (NH3	1D Qty	0.060	.66086	3/1/2012
March 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.33194	3/1/2012
March 2012	001	CBOD 5 day	30D Conc	10	22.5	3/1/2012
March 2012	001	Total Suspended Solids	1D Conc	18	32.	3/25/2012
March 2012	001	CBOD 5 day	1D Conc	15	36.	3/25/2012
April 2012	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.95	4/1/2012
April 2012	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.13531	4/1/2012
April 2012	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	23.8	4/24/2012
April 2012	001	Nitrogen, Ammonia (NH3	1D Qty	0.060	.27025	4/24/2012

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2011	001	Color, Severity	1/Day	1	0	8/23/2011
August 2011	001	Odor, Severity	1/Day	1	0	8/23/2011
August 2011	001	Turbidity, Severity	1/Day	1	0	8/23/2011

Method of flow monitoring:	Dosing pump timer
Type of alarms for plant:	Visual (flashing light)
WWTP Classification	A

SECTION D: PRELIMINARY TREATMENT

Type of Preliminary Treatment: Trash Trap
Does the Trash Trap need pumping?: No
Maintenance of pretreatment components is **satisfactory**

Comments/Status:

SECTION E: AERATION

Color of sludge: **Earthy brown**
Quality of Sludge: **Satisfactory**
Foam: **Not significant**
Odor: **Not significant**

	Yes	No		Yes	No
Aeration is taking place	☒	☐	Plant is septic	☐	☒
Blowers are operational	☒	☐	Blowers are on a timer	☒	☐
Skimmers are operational	☒	☐	Plant is flooded	☐	☒
Diffusers are operational	☒	☐	Grating is present	☒	☐
Sludge return is operational	☒	☐			

Maintenance of aerating equipment is **satisfactory.**

Comments/Status: *Skimmers are only used during cleaning operations and not operated continuously.*

SECTION F: CLARIFIERS

Clarity: **Satisfactory**
Condition of Weir: **Satisfactory**
Weir is level: **Yes**
Effluent in weir: **Clear (weir surfaces need cleaning soon)**
Clarifier walls need scraped: **No**
Pin floc observed: **Not significant**
Sludge blanket visible: **Yes**

Overall maintenance of settling components is **satisfactory.**

Comments/Status:

SECTION G: TERTIARY TREATMENT

	Yes	No		Yes	No
Surface sand filters:	☒	☐	Subsurface/Upflow	☐	☒
Distribution box operational	☒	☐	Beds alternated	☒	☐
Are filters ponding/flooding	☐	☒	Beds raked	☒	☐
Sand filters overgrown	☐	☒	Chlorination present	☒	☐
UV present	☐	☒	Dechlorination present	☒	☐

Frequency of cleaning: **As needed**
Fixed media upkeep: **NA**
Overall maintenance of components **satisfactory.**

Comments/Status:

SECTION H: SLUDGE HANDING / STORAGE DISPOSAL

Hauler name: **Carl Wheeler**
Disposal Site: **Wheeler's Sludge Holding**
Sludge wasted from: **Aeration Tank**
How often is sludge wasted? **Once per month**
Sludge drying beds: **NA**
Sludge holding tank: **NA**

Comments/Status: *Received copy of May 8, 2012, invoice from Carl Wheeler for 4,000 gallons of MLSS for disposal. Sludge handling is satisfactory.*

SECTION I: RECORD KEEPING / OPERATOR OF RECORD

	Yes	No
Operator of Record holds unexpired license of class required by Permit?	☒	☐
Has the Operator of Record submitted an ORC Notification form?	☒	☐
Copy of certificate of Operator of Record displayed on-site?*	☒	☐
~~If a Staffing Reduction plan has been approved, are the stipulations of the plan being met?~~	☐	☐
Operator of Record log book provided?	☒	☐
Minimum operator staffing requirements fulfilled (OAC 3745-7)?	☒	☐
Log book kept onsite (in an area protected from weather)?	☒	☐
Log book contains the following:		
Identification of treatment works	☒	☐
Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	☒	☐
Daily record of operator and maintenance activities (including preventative maintenance, repairs and requestfor repairs, process control test results, etc.)	☒	☐
Laboratory results (unless documented on bench sheets)	☒	☐

Identification of person making entries		☒	☐
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		☒	☐
Logbook Format	**Computer log**	Round book	

Comments/Status: **No place to display certificate. Operator carries certificate on person.*

SECTION J: PLANT DISCHARGE

Discharge point is a: **Unnamed Tributary to S. Fork Licking River**
Name of discharge point: **001**
Discharge is visible: **Not evaluated**
Quality of Effluent: **Ammonia is problematic**

Comments/Status: