



Environmental
Protection Agency

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

July 9, 2012

Mr. Ron Volkerding, Director
Greene County Department of Sanitary Engineering
667 Dayton-Xenia Road
Xenia, Ohio 45385-2605

**Re: Greene County Beaver Creek Water Resource Reclamation Facility
NPDES Permit No. 1PK00003*LD; OH0025381
NPDES Compliance Inspection and Notice of Violation**

Dear Director Volkerding:

On June 14, 2012, I conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection at the above referenced facility. The following Greene County Sanitary Engineering Department representatives were present during the inspection: Jim Fox, Deputy Director, Mark Feldman, Manager, Mark Self, Operator, and Jim Martin, Laboratory Manager. Also present during the laboratory review were Teresa Shinkle, Lori Kyle, and Lisa Lehotay. The purpose of the inspection was to evaluate several aspects of plant operation and performance, and to assess compliance with the facility's NPDES permit.

Observations and findings of the inspection are detailed in the attached report. The plant appeared to be operating in compliance with the requirements of the NPDES permit. All compliance parameters evaluated during the inspection received satisfactory ratings except for "Flow Measurement" (refer to Section C of the report). This received a marginal rating because the South Plant flow meter has been out of service for approximately one year. In addition, one of the primary degritter tanks has been out of service for a significant period of time. These units should be repaired and placed back into service as soon as possible. Review of the submitted electronic Discharge Monitoring Reports from July 2009 through May 2012, indicated several exceedances of the permitted final effluent limits. These are listed in the report. Greene County previously provided written notification and explanations for these violations. No additional information is required at this time.

A review of the laboratory was conducted as part of the inspection. The laboratory wastewater testing procedures reviewed were generally in compliance with the NPDES permit and Ohio EPA's General Lab Criteria. Refer to the attached report for additional details and recommendations.

Mr. Ron Volkerding, Director
Greene County Department of Sanitary Engineering
July 9, 2012
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Please provide this office with a written progress report for returning the treatment units back into service. If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,

A handwritten signature in cursive script that reads "Michael W. Zimmerman". The signature is written in black ink and is positioned above the typed name.

Michael W. Zimmerman
Environmental Specialist
Division of Surface Water

Enclosure

cc: Mark Feldman, Greene County Sanitary Engineering
Jim Martin, Greene County Laboratory

MWZlbp



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
<u>1PK00003*LD</u>	<u>OH0025381</u>	<u>6/14/2012</u>	<u>C</u>	<u>S</u>	<u>1</u>

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Greene Co. Beavercreek WRRF 420 Factory Road Beavercreek, Ohio 45434 Mailing: 667 Dayton-Xenia Xenia, Ohio 45385	9:00 am	5/1/2009
	Exit Time	Permit Expiration Date
	12:35 pm	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jim Fox, Deputy Director Mark Feldman, Manager, Wastewater Division Mark Self, Class III Operator Jim Martin, Laboratory Manager	937-562-7450 937-562-7169 937-562-7162	
Name, Address and Title of Responsible Official	Phone Number	
Ron Volkerding, Director	937-562-7450	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Review of operating records and electronic Discharge Monitoring Reports as well as observations made during the inspection indicate the treatment plant is generally in compliance with its NPDES permit. However, during the period 7/1/2009 thru 5/31/2012, there were several final effluent limit violations (refer to report). Several treatment units were off-line during the inspection, including one of the two primary degritter tanks, one of the North Plant's final clarifiers (North Plant was off-line), and the South Plant flow meter. The final effluent was relatively clear with some foaming (due to aeration at the outfall) which dissipated fairly quickly.</p>	
Inspector	Reviewer
 Mike Zimmerman Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date	Date

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..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

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..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Final effluent permit limitation exceedances for the period July, 2009 thru May, 2012:

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	Nitrogen, Ammonia (NH3)	7D Conc	1.6	1.82	8/8/2010
March 2011	Total Suspended Solids	7D Qty	772	1361.60	3/8/2011
April 2011	Mercury, Total (Low Level)	30D Conc	12	14.7	4/1/2011
April 2011	Mercury, Total (Low Level)	30D Qty	0.0003	.00053	4/1/2011
April 2011	Total Suspended Solids	7D Qty	772	1292.95	4/15/2011
May 2011	Total Suspended Solids	30D Qty	354	533.711	5/1/2011
May 2011	Total Suspended Solids	7D Qty	515	990.129	5/1/2011
June 2011	Nitrogen, Ammonia (NH3)	7D Conc	1.6	2.18667	6/15/2011
June 2011	Nitrogen, Ammonia (NH3)	7D Qty	51.5	57.6598	6/15/2011

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.....
Three generators – operates all units
- ii. How often is the generator tested under load.....
Every two weeks
- (b) Which components have an alarm system available for power or equipment failures.....
All components of the treatment system are electronically monitored and alarmed.
- (c) All treatment units in service other than backup units..... N
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....
Calendar schedule
- (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:

All influent wastewater receives primary treatment which includes three primary clarifiers (all in service) and degritting. Depending on the influent flow volume, flow is then routed to the North Plant (newer) and/or the South Plant (older). Under normal flows, the South Plant is operated. Due to normal influent flow volumes, the North Plant was not in use during the inspection.

The following treatment units were not in service:

- 1) One of the two primary degritter tanks- off-line due to pipe deterioration; has been off-line for about a year. This has created a problem with increased grit flowing through the clarifiers to the digesters and subsequently to the centrifuges.**
- 2) The South Plant flow meter has not been operational for approximately one year. This meter measures flow to the South Plant at the splitter box. This value is used to determine the flow volume to the North Plant (subtracted from the influent flow volume).**
- 3) The North Plant was off-line the day of the inspection. Tanks were being cleaned and serviced. The travelling bridge on one of the two clarifiers was down, parts to repair have been ordered. One effluent pump was out of service.**

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.....Y
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hardbound books
- (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)... Y
 - v. Identification of person making entries..... Y
- (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:

Mark Feldman – new Manager of the Wastewater Division – Class IV

Mark Self and Rob Smith – Class III Operators

Dave Potter – Class I Operator

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..... 11
 - ii. How many pump stations have telemetered alarms..... 0
 - iii. How many pump stations have operable alarms..... 11

- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... Y
- (d) Are there CSOs in the collection system..... N
if so, what is the LTCP status.....

NA

- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....

NA

- (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:

The Beavercreek Plant has I and I problems. Greene County's five year capital improvement plan includes a study of the Beavercreek POTW collection system in 2013. They have also budgeted money to do sewer lining over the next few years.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.
Class A - Exception Quality Sewage Sludge (monitoring station 584)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 - Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 - Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Gamma ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Class B Sewage Sludge

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 - Land Injection	Option 10 - Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Has the amount of sludge changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A
- (h) Is a contractor used for sludge disposal..... N/A
 If so, what is the name of the contractor.....

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

<i>Parshall flume with ultrasonic level sensor</i>
--
- (b) Flow meter calibrated annually Y
(Date of last calibration: *May, 2012*)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

Comments/Status:

A SCADA system controls and records operational information.

Final effluent flow at 10:45 on June 14th – 6.70 MGD

South Plant flow meter has been out of service for approx. a year. This meter is used to determine flow volume to the North Plant during higher flow conditions. The "Flow Measurement" parameter was given a marginal rating because of this condition.

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:

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 known 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..... Y
- (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 and free cyanide (Test America Inc.); organics (Belmont Labs); low level Hg (Alloway Labs); whole effluent toxicity, acute and chronic (Alloway Labs)**
Lab name:

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling Y
Date: **2010**
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Due to personnel changes, the lab did not participate in the 2011 DMRQA study. They are participating in the 2012 study.

Section J: Effluent/Receiving Water Observations

Outfall # **001**

Outfall Description: *Final effluent form UV disinfection tank to a 50-ft effluent channel*

Receiving Stream: *Little Beaver Creek*

Receiving Stream Description: *Right bank; slight amount of foam, which dissipates within approx. 150 feet downstream*

Comments/Status:

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:

Summary of Findings:

1. The Beavercreek WWTP was operating under normal flow conditions with only the older South Plant in service. Final effluent flow recorded during the inspection was 6.70 MGD. Under higher flow conditions (rainfall events), flow can be routed to the North Plant after primary treatment. The two EQ tanks can also store excessive flow during storm events.
2. The South Plant aeration system consists of 4 aeration units; each unit has a central anoxic tank with 3 mixers and an aeration tank on each side. The aeration pattern in each tank was evenly distributed. Both South Plant clarifiers were on-line. The sludge blanket was at approximately 1.5 feet. Some pin floc was observed, including clouds of floc below the surface. These commonly develop but apparently do not overflow the weirs (the weirs were relatively clean). Alum is introduced into the system at the secondary clarifier splitter box.
3. Several treatment units were not in service, including one of the two primary treatment degritter tanks. Repairs should be made to this degritter and it should be placed back into operation as soon as possible. The South Plant flow meter should also be serviced and placed back on-line.
4. Maintenance and repairs were being performed on the North Plant treatment units. Operators were waiting on parts to repair the travelling bridge on one of the two clarifiers.
5. Greene County has included work on the Beavercreek plant's collection system (inflow and infiltration problems) in their five year capital improvement plan.

Laboratory

The Greene County Water and Wastewater Laboratory is located immediately adjacent the Beavercreek plant. As part of the inspection, a tour of the laboratory was conducted. A review of the General Lab Criteria was conducted with laboratory personnel. Because this was the first review of the laboratory's wastewater analytical testing procedures in relation to the Lab Criteria, a rating/score was not assigned. However, the laboratory procedures reviewed were acceptable and generally in compliance with the criteria. The importance of written Standard Operating Procedures (SOP's) as part of the laboratory's Quality Assurance program was discussed. Lab personnel agreed to review and update their SOP's for all analyses performed at the lab. This includes developing an SOP for sample collection, handling, and cleaning of sampling equipment. Additional recommendations for laboratory operations include: 1) laboratory instrument manuals being available and 2) implementing the use of hard-bound log book for recording information such as instrument maintenance and repair, annual calibrations of instruments (i.e. balance), etc. The use of bench sheets for recording information such as daily instrument calibrations, analytical data, and temperature readings is acceptable.

Discharge Monitoring Reports

Review of the electronic Discharge Monitoring Reports submitted by Greene County from July 1, 2009 through May 31, 2012 revealed the following final effluent limitation violations:

Final Effluent Limitation Violations for Outfall 001

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	Nitrogen, Ammonia (NH3)	7D Conc	1.6	1.82	8/8/2010
March 2011	Total Suspended Solids	7D Qty	772	1361.60	3/8/2011
April 2011	Mercury, Total (Low Level)	30D Conc	12	14.7	4/1/2011
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May 2011	Total Suspended Solids	7D Qty	515	990.129	5/1/2011
June 2011	Nitrogen, Ammonia (NH3)	7D Conc	1.6	2.18667	6/15/2011
June 2011	Nitrogen, Ammonia (NH3)	7D Qty	51.5	57.6598	6/15/2011

No violations have been reported for the last 12 months.