



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

October 19, 2012

Re: Pretreatment
EnviroTank Clean, Inc.
City of Belpre
Compliance Inspection
ODP00005*EP

Mr. Ray Lutes, Vice President
EnviroTank Clean, Inc.
12381 State Route 7, Unit A
Belpre, Ohio 45714

Dear Mr. Lutes:

On October 4, 2012, Tim Campbell and I inspected EnviroTank Clean (ETC) in Belpre. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and B.S. Saluja, President, represented EnviroTank Clean during the inspection. ETC appeared to be in substantial compliance with its IDP at the time of the inspection.

General Facility Description

EnviroTank Clean performs tank truck cleaning and treats wastewaters and sludges from various off site customers. Waste streams may include landfill leachate, purge water from monitoring wells, recovered product spills, contaminated soils, oil water separator liquids and solids, machining lubricants, sludges and underground storage tank service waters. Oil and gas field wastes include pit sludges, drilling muds, pit waters, and limited volumes of flowback and production waters. High salinity wastewaters are hauled to an injection well for disposal.

Daily flows averaged approximately 20,000 gallons during the past year. EnviroTank's discharge is regulated by the Centralized Waste Treatment Point Source Category 40 CFR 437.46 Subpart D. EnviroTank's IDP will expire October 31, 2012. EnviroTank has applied for renewal of the IDP.

Pretreatment System

The wastewater treatment system includes storage in one of five holding tanks, equalization, emulsion breaking, oil removal, neutralization, primary clarification, hexavalent chrome reduction, flocculation, metals precipitation, dissolved air floatation,

two stage activated sludge treatment, secondary clarification, and sand filtration. An aerated sludge holding tank is used for sludge digestion followed by a belt filter press for dewatering.

Sludge treatment facilities include four (4) sand drying beds for dewatering. The facility also has a covered, sloped mixing area for solidifying liquids, oily liquids and sludges.

Comments

1. EnviroTank reported the following exceedances of its IDP limits between January 2012 and July 2012.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01102	Tin, Total (Sn)	30D Conc	120	166	1/1/2012

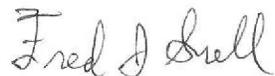
EnviroTank conducted an investigation of tin sources and revised its operations to address violations of tin limits. It appears that these measures have been effective as no further exceedances have been reported since January, 2012.

2. EnviroTank said that all metal bearing wastewaters are treated in all units of its metals treatment system. EnviroTank was not sure how many of the incoming wastes contained hexavalent chrome. It is suggested that ETC evaluate its incoming wastes to determine if they contain hexavalent chromium prior to treating the wastes for chromium reduction. ETC may realize a savings on chemical costs if many of the wastes do not require chromium reduction. The chrome bearing wastes could be segregated and accumulated, then only the chrome bearing wastes treated for hexavalent chrome reduction when needed. The IDP does not require treatment of wastes in treatment units where there is no benefit to providing the treatment.
3. ETC reported that the DAF unit is difficult and time consuming to operate. I recommend that ETC perform a study to determine if full time use of the DAF is necessary to achieve adequate solids removal. ETC also removes solids downstream of the DAF unit, in the secondary clarifier, settling basin and sand filter prior to discharge. If it is found that the DAF provides more problems than benefits, ETC may wish to stop continuous use of the unit and bring it online only when needed.
4. The sand filter was flooded at the time of the inspection. ETC reported the flow must be stopped periodically to service the filter. ETC may wish to consider replacing the sand filter with installation of two (2) or more recirculating media filters. The recirculating filters can be mechanically back washed to reduce labor

and provide continuous service. One filter can remain in service while the other is off line for maintenance or backwashing. Please notify Ohio EPA prior to making any changes to the treatment system.

You may contact me at (740) 380-5423 office with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Fred J. Snell".

Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

c: Mike Betz, City of Belpre
c: Pretreatment Unit, DSW, CO



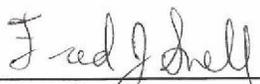
State of Ohio Environmental Protection Agency
Southeast District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
ODP00005*EP	OHP000049	October 4, 2012	6	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
EnviroTank Clean 12381 State Route 7 Belpre, Ohio 45714		10:00 a.m.	October 12, 2007
		Exit Time	Permit Expiration Date
		1:00 p.m.	October 31, 2012
Name(s) and Title(s) of On-Site Representative(s)		Phone Number(s)	
Ray Lutes, Vice President		(740) 423-0907	
Name, Address, and Title of Responsible Official		Phone Number	
B. S. Saluja, President		(304) 755-3166	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)					
S	Permit	S	Flow Measurement	S	Pretreatment
S	Records/Reports	S	Laboratory	N/A	Compliance Schedules
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)			
Inspector		Reviewer	
 Fred J. Snell Division of Surface Water Southeast District Office		 Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	
10/19/12 Date		10/19/12 Date	