



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

November 1, 2012

Mr. Matt Dobouni
Clean Water Ltd.
300 Cherokee Drive
Dayton, Ohio 45417

RE: Clean Water Ltd., 1GRN00493*DG, Inspection

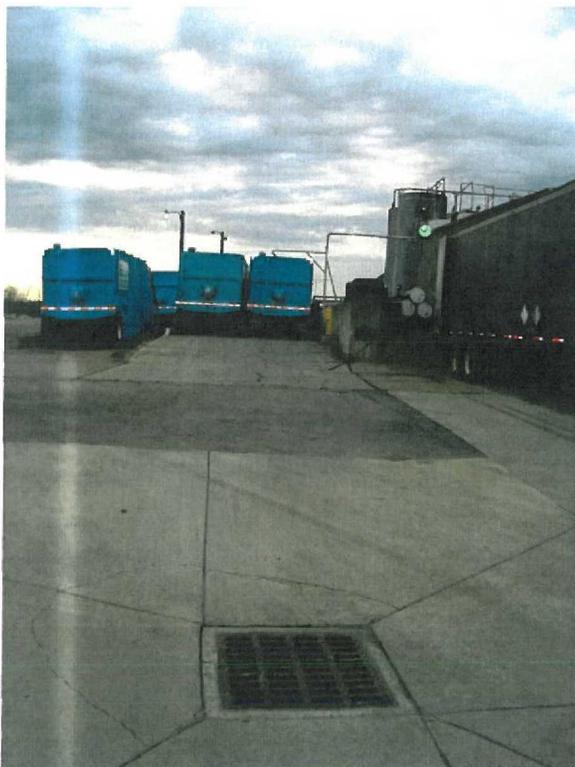
Dear Mr. Dobouni:

On October 23, 2012, I conducted a storm water inspection at Clean Water Ltd Dayton facility. Maria Cruset represented the facility. The purpose of the inspection was to verify the facility's no exposure certification for its storm water.

The inspection started with a brief meeting with Josh Rembusch and Ms. Cruset. After the meeting, Ms. Cruset and I walked the facility. There are two catch basins on the north side of the facility which discharge into the one storm water outfall for the site. This outfall then discharges into a grassy swale. The following is a picture of the storm water outfall:



The swale had mud in it from the previous night's rain. There was no evidence of any oils or oily waste discharging from this outfall. There are two catch basins tributary to this outfall.



Upstream catch basin



The arrows note the location of the two catch basins looking from the outfall

There are frac tanks and 55 gallon drums stored in this area. There were no leaks noted during the inspection. There was no evidence of any spills or leaks in the catch basins. The frac tanks with material in them were in temporary secondary containment. This consisted of a liner with metal braces to hold the sides in place. These containment units need to be inspected at least daily to ensure the braces are still in place, and the liner isn't sagging. At least two of the secondary containment units were sagging. They did not appear to be leaking any liquid.

There is a catch basin in the unloading area near the wastewater treatment system. The following is a picture of this basin:



This basin is pumped into the pretreatment system. The hose shown in the picture is used for unloading tanker trucks directly into the wastewater treatment system. This is not discharged to waters of the State. This is discharged to the Montgomery County (the County) Sanitary Sewer under a permit issued by the County. The treatment chemicals are seen in the back of the picture. There was also an open bucket used under the valve to catch drips when the truck is unloading, and totes with sludge from the wastewater treatment system waiting to go to the filter press. The following are pictures of these two items:



The totes could be a potential source of odors. This material can turn anoxic or anaerobic sitting in the totes. The quicker the solids are taken to the filter press and processed, the less of a chance there is for odors to occur.

There was an old boiler next to the scrap metal dumpster. This was exposed to storm water without any containment. This boiler must be moved to an area with no exposure to storm water, or taken off-site as scrap. There were numerous projects occurring at the facility to improve operations. This is the reason for the old boiler being outside.

As part of the inspection, the area where the Dissolved Air Flotation (DAF) System is located was visited. There are two DAFs in the building. One is the pilot unit, and the other is the new unit. The facility is now looking at keeping the pilot unit. This unit has been installed without first obtaining a Permit to Install (PTI). This is a violation of Ohio Administrative Code 3745-42 and Ohio Revised Code 6111.45. There is an application at Ohio EPA for this unit, but the facility is working on responding to comments from Ohio EPA. The additional information needed for this application was also discussed. In addition, the new filter press in Building G would also be a part of the application. Any sludge stored outside of a building must be in sealed, covered containment with a roof and sides to prevent storm water from coming in contact with the sludge.

Any wastes brought in for treatment in totes and the hazardous waste drums are stored in a three sided building with spill containment. There is no exposure to storm water. The tank farms have secondary containment and sumps. Any material spilled in the diked areas is collected and pumped to the treatment system.

The facility has spill kits located throughout the site.

ACTIONS FOR FOLLOW-UP

Clean Water Ltd. must prevent the old boiler from coming into contact with storm water. It could be removed from the site, or placed under cover. This exposure must be eliminated by November 19, 2012. Please notify this office, via email or letter, when this is completed.

Clean Water Ltd. must add the secondary containment around the frac tanks to its daily inspections to ensure it is working as required. This must begin immediately.

Clean Water Ltd. must prevent the exposure of storm water with the sludge from the filter press. At the inspection, a roofed building extension was discussed. Please provide the means for doing this by November 19, 2012. If this cannot be done, then the facility would no longer be eligible for the No Exposure Certification.

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The assistance provided by your staff was appreciated. Should you have any additional questions, please contact me at (937) 285-6108.

Sincerely,



Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

MP/tb

Enclosure

ec: Mike Proffitt, SWDO
Debora Roth, SWDO
Paul Pardi, SWDO
Darla Peelle, PIC/CO

cc: Maria Cruset, Clean Water Ltd.



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
NA	1GRN00493*DG	10/23/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Clean Water Ltd. 300 Cherokee Drive Dayton, Ohio 45417	9:10 am	3/1/2009
	Exit Time	Permit Expiration Date
	10:20 am	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Maria Cruset, Director of Environmental Compliance	(937) 268-6501	
Name, Address and Title of Responsible Official	Phone Number	
Matt Dobouni, General Manager Clean Water Ltd. 300 Cherokee Drive Dayton, Ohio 45417	(937) 268-6501	

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
N	Operations & Maintenance	N	Effluent/Receiving Waters	N	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

See letter and attached form.

Inspector	Reviewer
 Date: 10/31/12	 Date: 11/2/12
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Industrial Storm Water No Exposure Inspection

Name of facility: Clean Water Ltd.

Address: 300 Cherokee Drive, Dayton, Ohio 45417

Permit number: 1GRN00493*DG

Applicable permit sector: NA SIC Code: 4953

Date of visit: 10/23/12

Time started: 9:10 am

Time ended: 10:20 am

Facility representative(s): Maria Cruset, Josh Rembusch

OEPA inspector: Mari Piekutowski

Exposure Checklist Items

- A. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water? Y/N

Comments:

- There was an old boiler that was just removed from the facility sitting next to a scrap metal dumpster. This must be removed for the No Exposure certification.
- B. Materials or residuals on the ground or in storm water inlets from spills/leaks? Y/N

Comments:

- There are two catch basins on the north side of the facility. There was no evidence of any spills or leaks. Both of the catch basins drain to one storm water outfall on the north side of the facility. There was typical sediment from streets, but no indication of any materials or residuals associated with industrial activity.
- C. Materials or products from past industrial activity? Y/N

Comments:

- There are frac tanks on-site, but they have secondary containment. Any material collected in the containment is pumped out for treatment and discharged to the sanitary sewer. The secondary containment needs to be routinely inspected to ensure the walls are upright.

D. Material handling equipment (except adequately maintained vehicles)? ~~Y~~/N

Comments:

- Materials are handled in contained areas that are pumped out for treatment and are then discharged to the sanitary sewer.
- There are buckets in a containment pad at waste treat to catch leaks from hoses.

E. Materials or products during loading/unloading or transporting activities? ~~Y~~/N

Comments:

- The sludge from the treatment system is loaded into totes and taken to the sludge press. The totes are stored on a containment pad that is pumped for treatment and discharged to the sanitary sewer. There are also trucks unloaded at the wastewater treatment system. This is done on the same pad.

F. Materials or products stored outdoors (except final products intended for outside use where exposure to storm water does not result in the discharge of pollutants)? ~~Y~~/N

Comments:

- There is secondary containment around the frac tanks. There were dumpsters with pallets and scrap metal. The old boiler was sitting next to the scrap metal dumpster. This boiler must be moved to an area with no storm water exposure or recycled.

G. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks and similar containers? Y/N

Comments:

- There were empty drums on a pad on the north side of the plant. They were closed.
- There are buckets by waste treatment used to collect any leaking material while unloading are located on a pad as noted above.

H. Materials or products handled/stored on roads or railways owned or maintained by the discharger? ~~Y~~/N

Comments:

- Not applicable.

I. Waste material (except waste in covered, non-leaking containers[e.g., dumpsters]) ~~Y~~/N

Comments:

- The dumpsters were self-contained. They should be covered to prevent storm water from entering them. These were the pallet/scrap metal dumpsters. The solid waste and sludge dumpster were not leaking and were covered.

J. Application or disposal of process wastewater (unless otherwise permitted)? ~~Y~~/N

Comments:

- All of the process wastewater and contaminated storm water from the diked areas is treated and discharged to the Montgomery County sanitary sewer under a discharge permit.

K. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air permit) and evident in the storm water outfall? ~~Y~~/N

Comments:

L. No. outfalls from site/no. inspected 1/1

M. Did any show evidence of pollutants discharged in the storm water? ~~Y~~/N

If yes, describe;

N. Other observations/comments;

- Storm water from the diked areas goes through the pretreatment system, and is discharged to the Montgomery County sanitary sewer.
- There is a daily check done of the property to ensure there are no leaks.
- Any totes stored outside of the facility are empty, or contain virgin product. They are closed. Any spills would be contained, treated and discharged to the sanitary sewer.
- There is no on-site vehicle maintenance. Trucks are fueled on-site. This is done on the containment pad where vehicle unloading occurs. Any storm water from this area is collected and treated.
- The air pollution control equipment is an RTO. This is for organics. The condensate from this unit is sent to the containment pad. This goes to a sump that discharges to the pretreatment system.
- Building G has the new press. There is going to be an addition onto the building for the sludge dumpster. This press was not operating at the time of the inspection.
- Building B has the existing press. CWL is working on cleaning this building up.
- The areas outside of the containment at the facility did not appear to have contaminated storm water. The areas with the contaminated storm water are captured and treated.

- The site is surrounded by a grassy area prior to the storm water leaving the site. This area would act as a buffer for the storm water. There did not appear to be any evidence of contaminated storm water off-site in the drainage swale running parallel to the property.
- The facility had a rain event the night before and morning of the inspection.