

**Environmental
Protection Agency**

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

March 28, 2012

**RE: Clifton Wastewater Treatment Plant/ Compliance
Evaluation Inspection and Notice of Violation, NPDES
Permit No. OH0118567/ OEPA Permit No.
1PA00023*CD**

Mr. Ron Volkerding
667 Dayton-Xenia Road
Xenia, Ohio 45385-2665

Dear Mr. Volkerding:

On March 22, 2012, Mike Zimmerman and I conducted an NPDES Compliance Evaluation Inspection at the Clifton Wastewater Treatment Plant. Greg Stewart, Operator of Record, was present for the facility. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's NPDES permit.

The Records/Recording section received a "Marginal" rating due to missing Non-Compliance Notifications. All other areas evaluated received a "Satisfactory" rating. **Please pay attention to the "Items Requiring Correction" (shown in bold type) within the report.**

During the inspection it was noted that Jeff Blair is no longer with Greene County. Greene County needs to submit an *Operator of Record (ORC) Notification Form* to request removal of Mr. Blair from the list of certified operators for Greene County. This form can be found at:

http://epa.ohio.gov/portals/28/documents/opcert/Operator_of_Record_Notification_Form.pdf

A copy of the inspection report is enclosed.

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

Respectfully,



Michelle Waller
Environmental Specialist II
Division of Surface Water

Enclosures

cc: Greg Stewart, Greene County

MW\bp



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
1PA00023*CD	OH0118567	3/22/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Clifton Wastewater Treatment Plant 3865 State Route 72 North Cedarville, Ohio	10:15 AM	2/1/2009
	Exit Time	Permit Expiration Date
	11:15 AM	1/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Steward, Operator of Record	(937) 603-5577	
Name, Address and Title of Responsible Official	Phone Number	
Ron Volkerding 667 Dayton-Xenia Road Xenia, Ohio 45385-2665	(937) 562-7414	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
M	Records/Reports	N	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)	
<p>Chironomid larvae were noted in the clarifier.</p> <p>Please see attached report.</p>	
Inspector	Reviewer
 Michelle Waller Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
3/28/12 Date	4/4/12 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..... | N |
| (c) Permittee is taking actions to resolve violations..... | Y |
| (d) Permittee has a compliance schedule..... | Y |
| (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 | Y |

Comments/Status:

A compliance check was done from January 2011 to February 2012 showed a pH violation in June 2011, and Total Residual Chlorine violations in August 2011 and September 2011. Only a Non-compliance Notification was submitted to the OEPA for the June 2011 violation.

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.....

The back-up generator runs the whole plant.
 - ii. How often is the generator tested under load.....

The generator is tested every 2 weeks.
- (b) Which components have an alarm system available for power or equipment failures.....

None of the components are currently alarmed. Clifton is talking about possibly putting in an auto-dailer. The generator will kick on if the power goes out.
- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

Maintenance is taken care of by a central maintenance group for Greene County.
- (e) Any major equipment breakdown since last inspection..... Y
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... N/A
- (h) Any plant upsets since last inspection..... N/A

Comments/Status:

(e) – A blower went down last year, but a backup was used.

The O&M plan is located with the central maintenance group.

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (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)

A hard bound book is used for the log book.
- (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..... 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:

Clifton has five Operators of Record listed for Clifton. Jeff Blair is no longer with Greene County and a request to the OEPA should be made to remove his name.

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..... 1
 - ii. How many pump stations have telemetered alarms..... 1
 - iii. How many pump stations have operable alarms..... 0
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N/A
- (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..... N
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... N
- (j) Is any portion of the collection system at or near dry weather capacity..... N

Comments/Status:

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill
- (b) Has amount of sludge generated 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
If so, what is the name of the contractor.....

Comments/Status:

Sludge is hauled to Beaver creek. Sludge was last hauled February 1, 2012. Sludge is hauled approximately 3-4 times per year.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
- (b) Flow meter calibrated annually Y
(Date of last calibration: 5/16/2011)
- (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:

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 J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Manhole prior to discharge.

Receiving Stream: Little Miami River

Receiving Stream Description: Clear, no foam or solids noted.

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:

Notice of Violation

1. Limit Violations

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
1PA00023*CD	June 2011	pH	1D Conc	6.5	6.4	6/6/2011
1PA00023*CD	August 2011	Chlorine, Total Residual	1D Conc	0.038	.16	8/31/2011
1PA00023*CD	September 2011	Chlorine, Total Residual	1D Conc	0.038	.08	9/1/2011

A Non-Compliance Notification was received for the June 2011 violation. No Non-Compliance Notifications were received for the August 2011 and September 2011 violations as required in the NPDES permit. **Please inform this office, in writing by April 27, 2012 as to the reason(s) for the above referenced violation(s), as well as a description of the action(s) taken or proposed to prevent any further violation(s). Your response should include the dates, either actual or proposed, for completion of the action(s). Future violations must be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."** Not turning in these Non-compliance Notifications resulted in the rating of "Unsatisfactory" for the Records/Reports section of the evaluation.