



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

January 4, 2013

**Re:** Pretreatment  
Superior Marine Ways, Inc.  
Village of South Point  
Compliance Inspection  
Permit No. ODP00037\*DP

Mr. Frank Kiser, Dir. of Env. Safety and Health  
Superior Marine Ways, Inc.  
P.O. Box 519  
South Point, Ohio 45680

Dear Mr. Kiser:

On December 7, 2012, I conducted a compliance inspection at Superior Marine Ways, Inc. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You represented Superior Marine Ways during the inspection.

### **General Facility Description**

Superior Marine Ways performs harbor service, barge cleaning and barge repair. Operations may include fabrication, machining, welding and painting of marine equipment.

Wastewaters are generated from barge cleaning, tow boat bilge pumping, and heavy equipment washing.

Barge cleaning is performed on hopper and open top barges which had transported coal, gravel, sand and grain. Open top barges are cleaned by first removing residual products using a front end loader and shovels, then spray rinsing. Closed hopper top barges are cleaned using rinse water. Cleaning water from both barge types is then pumped to a closed hopper top storage barge.

Wastewaters from barge cleaning and bilge pumping are transferred to the wastewater treatment building using a 3200 gallon vacuum truck.

The wastewater treatment system consists of storage in four holding tanks, oil decanting, oil skimming and solids settling, coalescing oil separator, ozone disinfection, media and cartridge filtration, and activated carbon filtration. Treated water may be reused in a pressure washing system to clean heavy equipment prior to repairs, or discharged to the South Point Sewer. It was believed residual sludge from the treatment system was taken to Safety Kleen's Smithfield Kentucky facility. Oil recovered from the wastewater was hauled off site by Future Environmental of Mokena, Illinois.

Discharge to the South Point sewer occurs in batch. Flows for the past year averaged roughly 300 gallons per day. The flow meter was replaced since the previous inspection.

Superior Marine Ways is regulated by Ohio EPA as a noncategorical significant industrial user.

**IDP Violations:**

A review of effluent monitoring reports submitted between January 2011 and July 2012 indicated the following violations of Superior Marine Ways' IDP:

Zero of three expected sample results were reported for Flow, BOD, and pH on the January through June, 2011 reporting period. Results of only one of three required samples were reported on the July through December, 2011 report. Please be advised that failure to satisfy the reporting requirements of your Indirect Discharge Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please inform Ohio EPA of the reasons for the above violations. If any of the violations noted were the result of errors in reporting, please submit revised discharge monitoring report(s) (DMRs) to Ohio EPA.

**Required Actions:**

1. Superior Marine collects monthly samples from its pretreatment system, but only reports samples collected every other month. Part III, Paragraph E. of the IDP requires that if monitoring for any pollutant is performed more frequently than required by the permit, the results of the monitoring shall be reported on eDMR reports. Please report the results of all sampling at the discharge in the future. Please note that if samples are collected on days when there is no discharge, records of the sampling should be retained on site for 3 years, but the results of the sampling should NOT be reported.
2. Superior Marine's IDP requires sampling a minimum of three times every six months. The results of sampling must be reported on effluent monitoring reports as required in Part II, Paragraph 3 of the IDP. If there is no discharge to the sewer during an entire two month period, the (AC) code should be used in place of sampling results in the flow column on the eDMR report form to indicate there was no discharge for the period. Additional information on reporting procedures can be found online at: <http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>.
3. Superior Marine should ensure that all chain of custody forms are complete. The forms should indicate who was in possession of samples at all times after they were collected and when custody was transferred. The facility should also ensure that it receives copies of the completed forms from the laboratory, including documentation that the sample was properly preserved and received at the lab within required holding times. Copies of the complete forms received from the lab should be maintained on file at the facility for a minimum of three years. Several of the chain of custody forms on file were incomplete.

4. Superior Marine disposed of roughly 4 cubic yards of grit from the settling basin during the past year. It was unclear from the files where the material was disposed. Superior Marine should work with its transporters and receiving facilities to ensure that all haul records for future off site shipments of any residuals, sludges, and oils are clear, complete and accurate.
5. Superior Marine did not retain signed copies of DMR's in its files for the prior two years. Part III, Paragraph D. of the IDP requires Superior Marine to maintain signed copies of DMR's on site for a minimum of 3 years. Ohio EPA printed and forwarded copies of the referenced DMR's by US mail to Superior Marine on 12/17/12. Please ensure compliance with this requirement in the future.

**Comments:**

1. Superior Marine reported it collects and combines 3 manual samples of the discharge on sampling days to be analyzed for the parameters that require composite samples to fulfill the monitoring requirements of its IDP. This practice is acceptable and complies with the IDP composite sampling requirements.
2. Superior Marine has reported flow as a weekly total for the sample week on monitoring reports submitted during the past year.
3. Superior Marine proposes to treat and discharge its barge cleaning wastewaters directly to the Ohio River. Ohio EPA issued NPDES Permit Number 01N00273\*AD, with an effective date of September 1, 2012. Once construction of the barge cleaning wastewater treatment system is complete, barge cleaning wastewaters will no longer be discharged to the South Point POTW. It was estimated that the treatment system would be completed by the end of January, 2013. Please notify Ohio EPA when Superior Marine has permanently discontinued the barge cleaning discharge to the South Point POTW.

Please respond to this letter in writing within 30 days. You may contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell  
Pretreatment Coordinator  
Division of Surface Water

FJS/dh

Enclosure

c: Patrick Leighty, Village Administrator, Village of South Point  
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
ODP00037*DP	OHP000151	December 1, 2012	6	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Superior Marine Ways, Inc. 5852 County Road 1 South Point, Ohio 45680		11:30 a.m.	December 1, 2008
		Exit Time	Permit Expiration Date
		3:15 p.m.	October 31, 2012
Name(s) and Title(s) of On-Site Representative(s)		Phone Number(s)	
Frank Kiser, Director of Environmental Safety and Health		(740) 894-6224	
Name, Address, and Title of Responsible Official		Phone Number	
Dale Manns, President		(740) 894-6224	

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
M	Records/Reports	S	Laboratory		Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	M	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)			
See attached letter.			
Inspector		Reviewer	
Date		Date	
1/4/13		1/14/13	
Fred J. Snell Division of Surface Water Southeast District Office		Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	