



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

January 29, 2013

Re: Tuscarawas County
BRW Realty Ltd., Newcomerstown
Compliance Enforcement Inspection
0IN00230, OH0124613
Correspondence (IWW)

Mr. Benjamin Wright, Owner
BRW Realty Ltd.
130 Tenth Street
New Philadelphia, Ohio 44663

Dear Mr. Wright:

On January 9, 2013, I conducted a Compliance Evaluation Inspection (CEI) of the BRW Realty's Bulk Plant facility located in Newcomerstown, Ohio. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES Permit Number 0IN00230*CD. You were present during the inspection.

As a result of the inspection, I have the following comments:

1. A review of the facility's discharge monitoring reports (DMRs) from January 2010 through November 2012 showed no violations. The DMR's for August and October, 2011 were submitted late on August 15, 2012.
2. The skimmer and the oil and grease separator were in good working condition during the inspection.
3. BRW utilizes Ream & Haager Laboratory to complete the testing required by the NPDES permit.
4. An operation and maintenance manual should be developed for the treatment system. The manual should include a schedule for performing routine maintenance and inspections.
5. Your individual NPDES permit expires on July 31, 2012. Your renewal application is due no later than February 1, 2013. As an alternative to the individual NPDES permit, you may apply for coverage under the general NPDES permit for bulk fuel storage facilities. You can view the general permit and its conditions at the following website:

http://epa.test.ohio.gov/dsw/permits/GP_PetroleumBulkStorageFacilities.aspx

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Attached is a copy of the inspection report. If you have any questions about my inspection, please feel free to contact me by phone at (740) 380-5418 or email tim.fulks@epa.ohio.gov.

Sincerely,



Tim Fulks
District Representative
Division of Surface Water

TF/dh

Enclosure



State of Ohio Environmental Protection Agency
Southeast District Office

Industrial NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
0IN00230*CD	OH0124613	January 9, 2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
BRW Realty - Newcomerstown Bulk Plant 100 West Street Newcomerstown, Ohio 43832	9:30 a.m.	August 1, 2008
	Exit Time	Permit Expiration Date
	10:15 a.m.	July 31, 2013
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Benjamin Wright, Owner	(330) 339-7131	
Name, Address, and Title of Responsible Official	Phone Number	
Benjamin Wright, Owner 130 Tenth Street SW New Philadelphia, Ohio 44663	(330) 339-7131	

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

Section D: Summary of Findings (attach additional sheets if necessary)			
<p>Records/Reports: Discharge Monitoring Reports (DMRs) for August and October 2011 were submitted late. See attached letter for further information.</p> <p>Operations & Maintenance: Facility should develop a operation and maintenance manual for the treatment system which includes a schedule for routine maintenance.</p>			
Inspector		Reviewer	
 Timothy A. Fulks Division of Surface Water Southeast District Office		 Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	
Date 1/29/13		Date 1/29/13	

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee..... Y
- (b) Correct name and location of receiving waters Y
- (c) Do Categorical Standards apply? If yes, list applicable standards..... N
- (d) Product(s) and production rates conform with permit application (Industries) Y
- (e) Flows and loadings conform with NPDES permit Y
- (f) Treatment processes are as described in permit application Y
- (g) All discharges are permitted Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection N
- (b) Appropriate Non-compliance notification of violations N/A
- (c) Permittee is taking actions to resolve violations N/A
- (d) Permittee has a compliance schedule N
- (e) Compliance schedule contained in N/A
- (f) Permittee is in compliance with schedule N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

Section G: Operation and Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available generator or dual feed N
 - i. What does the back-up power source operate
 - ii. How often is the generator tested under load
- (b) Which components have an alarm system available for power or equipment failures
- (c) All treatment units in service other than backup units Y
- (d) What method is used for scheduling routine and preventative maintenance (calendar, software, etc.)
- (e) Any major equipment breakdown since last inspection N
- (f) Operation and maintenance manual provided and maintained N
- (g) Any plant bypasses since last inspection N
- (h) Any plant upsets since last inspection 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

*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% Solids without Unstabilized Solids	Option 8 - >75% 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 (monitoring station 581)

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% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids	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 amount of sludge generated changed significantly since the last inspection N/A
- (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) N/A
- (e) Any complaints received in last year regarding sludge N/A
- (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 operated and maintained.....N/A
 Type of device (e.g., weir with ultrasonic level sensor):
- (b) Calibration frequency adequate N/A
 Date of last calibration:
- (c) 24-hour recording instruments operated and maintained..... N/A
- (d) Flow measurement equipment adequate to handle full range of flows N/A
- (e) Actual flow discharged is measured N/A
- (f) Flow measuring equipment inspection frequency
 Daily: Weekly: Monthly: Other:

Comments/Status:

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 (see GLC page) Y
- (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:

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite N/A
- (b) Do SOP's include the following if applicable N/A
 - Title
 - Scope and Application
 - Summary
 - Sample Handling & 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 N/A
- (e) Analyses being performed more frequently than required by permit N
- (f) If (e) is yes, are results in permittee's self-monitoring report N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment (see score from GLC page) N/E
- (h) Commercial laboratory used Y
 - Parameters analyzed by commercial lab: **All parameters**
 - Lab name: **Ream & Haager Laboratory**

Discharge Monitoring Report Quality Assurance (DMRQA)

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

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall #: **001**

Outfall Description: **Final Outfall**

Receiving Stream: **Unnamed Tributary to the Tuscarawas River**

Receiving Stream Description: **No observable adverse impact to receiving stream**

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work & 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: