



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

February 27, 2013

The Honorable Joel McGuire, Mayor  
City of Harrison  
300 George Street  
Harrison, Ohio 45030

**RE: City of Harrison WWTP, NPDES Permit No. 1PC00002\*ID / OH0021440  
Compliance Evaluation/Pre-Permit Renewal Inspection**

Dear Mayor McGuire:

On Tuesday, December 18, 2012, Mr. Ron Ware of this office conducted a Compliance Evaluation Inspection of the City's wastewater treatment facility. A copy of the inspection report is enclosed. As indicated in the report, all but one of the areas evaluated during the inspection received ratings other than "Satisfactory."

The area designated as "Effluent/Receiving Waters" received an "Unsatisfactory" rating due to violations of the final effluent limitations in this facility's current NPDES Permit (1PC00002\*ID) that have occurred over the past year.

A draft renewal NPDES Permit for this facility (1PC00002\*JD) has been prepared and will be sent out to public notice in the coming month. This draft permit will have the following change:

Effluent Disinfection Standards

Due to changes in the state of Ohio's Water Quality Standards, the disinfection standard in NPDES Permits has been changed from fecal coliform to E. coli. For the City's treatment plant, the applicable E. coli standards will be 126 counts/100 ml (monthly geometric mean) and 284 counts/100/ ml (weekly geometric mean).

City of Harrison WWTP – Compliance Evaluation / Pre-Permit Renewal Inspection  
NPDES Permit No. 1PC00002\*ID  
February 27, 2013  
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If you have any questions regarding this report, please contact Mr. Ware at (937) 285 – 6098 or by email at [ron.ware@epa.ohio.gov](mailto:ron.ware@epa.ohio.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Martyn Burt".

Martyn Burt  
Compliance and Enforcement Supervisor  
Division of Surface Water

MB/tb

cc: James Leslie, Director of Utilities, City of Harrison



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
1PC00002*ID	OH0021440	02/14/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Harrison WWTP 10999 Campbell Road Harrison, Ohio 45030	10:02 AM	August 1, 2008
	Exit Time	Permit Expiration Date
	11:52 AM	January 31, 2013
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Bob Haas, Wastewater Coordinator Gene Allen, Pretreatment Coordinator		(513) 367 - 3725
Name, Address and Title of Responsible Official		Phone Number
James Leslie, Director of Utilities City of Harrison 10999 Campbell Road Harrison, Ohio 45030		(513) 367 - 3725

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Inspector	Reviewer
<i>Ron Ware</i> 2/27/13	<i>Martyn Burt</i> 2/27/13
Ron Ware Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Sections E thru K: Complete on all inspections as appropriate  
**Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated**

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**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<br>in permit..... | Y |

Comments/Status:

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**Section F: Compliance**

- |  |   |
|--|---|
| (a) Any effluent violations since the last inspection .....  | Y |
| (b) Permittee is taking actions to resolve violations.....   | Y |
| (c) Permittee has a compliance schedule.....                 | Y |
| (d) Compliance schedule contained in...Administrative Orders |   |
| (e) Permittee is in compliance with schedule.....            | Y |

Comments/Status:

(a) These effluent violations are listed on page 9 of this report.

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.....  

Entire facility.
  - ii. How often is the generator tested under load.....  

Every Tuesday.
  
- (b) Which components have an alarm system available for power or equipment failures.....  

Entire facility.
  
- (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 performed on an "as needed" basis.
  
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... N
- (h) Any plant upsets since last inspection..... N

**Comments/Status:**

Section G: Operation & Maintenance con't

**Record Keeping/Operator of Record:**

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

Hard bound book.
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- (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:

(j) Laboratory results are kept in separate log books.

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y  
(There is 5 pump stations in the collection system for this facility)
  - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 5
  - ii. How many pump stations have telemetered alarms..... 5
  - iii. How many pump stations have operable alarms..... 5
  
- (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/A  
if so, what is the LTCP status.....
  
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
  
- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... Y
- (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.....  
132,000 gallons of aerated storage.
- (d) Sludge adequately disposed..... Y
- (e) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... N/E
- (f) Any complaints received in last year regarding sludge..... N
- (g) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (h) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A
- (i) Is a contractor used for sludge disposal..... Y  
If so, what is the name of the contractor.....  
Rumpke

**Comments/Status:**

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):  
Weir with ultrasonic level sensor.
- (b) Flow meter calibrated annually ..... Y  
(Date of last calibration: November 29, 2012)
- (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
- (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 I: Self-Monitoring Program (con't)

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable..... Y
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and 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. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: Low level mercury, metals (final effluent and sludge), bioassays

Lab name: MASI

*Discharge Monitoring Report Quality Assurance (DMRQA)*

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

N/A

**Comments/Status:**

Latest participation in DMRQA program: July, 2012.

**Section J: Effluent/Receiving Water Observations**

Outfall # 1PC00002001

Outfall Description: Plant outfall to Whitewater River

Receiving Stream: Whitewater River

Receiving Stream Description: Exceptional Warm Water Habitat, Primary Contact Recreation

**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:**

Effluent Limit Violations

(Period of Review: Dec. 2011 – Dec. 2012)

7D = Weekly    30D = Monthly    1D = Daily  
Conc. = Concentration (mg/l)    Qty.= Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
Mar. 2012	Total Suspended Solids	30D Conc	12	28.8333	3/1/2012
Mar. 2012	Total Suspended Solids	7D Conc	18	28.	3/1/2012
Mar. 2012	CBOD 5 day	30D Conc	10	11.5	3/1/2012
Mar. 2012	Total Suspended Solids	7D Conc	18	35.6666	3/8/2012
Mar. 2012	CBOD 5 day	7D Conc	15	15.3333	3/8/2012
Mar. 2012	Total Suspended Solids	7D Conc	18	40.3333	3/15/2012
Dec. 2012	Total Suspended Solids	30D Conc	12	22.5	12/1/2012
Dec. 2012	Total Suspended Solids	7D Conc	18	19.3333	12/8/2012
Dec. 2012	Total Suspended Solids	7D Conc	18	31.3333	12/15/2012
Dec. 2012	Total Suspended Solids	7D Conc	18	32.	12/22/2012

Permit # 1PC00002\*ID  
NPDES # OH0021440