



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

March 22, 2013

Ms. Martha Farr, Trustee
The Pristine Facility Trust
7916 Shelldale Way
Cincinnati, Ohio 45242

RE: Hamilton County, The Pristine Facility Trust, Compliance Evaluation Inspection

Dear Ms. Farr:

On March 15, 2013, I conducted a Compliance Evaluation Inspection at The Pristine Facility Trust (Permit No. OHD000002; Permit No. 11N90002*BD). Representing this facility was Henry Cooke, Rob Robertson and you. A copy of my inspection report is enclosed.

The inspection report contains one marginal area. The Self Monitoring Program was rated marginal as a result of not cleaning the composite sampler in an acceptable manner or maintaining the composite sampler between 0-5°C.

The areas noted in the report summary will require a written response by April 12, 2013. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

A handwritten signature in black ink, appearing to read "Ned Sarle", is written over a light blue horizontal line.

Ned Sarle
Environmental Specialist
Division of Surface Water

NS/kb

Enclosure

cc: Henry Cooke, Conestoga-Rovers & Associates



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
1IN90002*BD	OHD000002	3/15/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
The Pristine Facility Trust 410 Cavett Drive Reading, Ohio	9:40 A.M.	12/1/2009
	Exit Time	Permit Expiration Date
	11:00 A.M.	N/A
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Martha Farr, Trustee	(513) 792 - 9323	
Henry Cooke, Site Manager	(513) 942 - 4750	
Rob Robertson, Site Operator	(513) 563 - 2876	
Name, Address and Title of Responsible Official	Phone Number	
Martha Farr, Trustee The Pristine Facility Trust 7916 Shelldale Way Cincinnati, Ohio 45242	(513) 792 - 9323	

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

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

See Attached Summary of Findings / Comments.

Inspector	Reviewer
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
3/22/13 Date	3/25/13 Date

Permit #: 11N90002*BD
NPDES #: OHD000002

Summary of Findings / Comments

Areas Requiring a Response

A composite sampler is provided for sampling the treatment system discharge. However, the composite sampler is not maintained at between 0-6°C. During the sampling events, the facility must either place the composite sampler in a refrigerator maintained at the appropriate temperature or surround the composite sampler container with ice.

The composite sample container and tubing is cleaned using an Alconex cleaning solution and then rinsed with tap water. This is not completely correct. Please clean the sample container and sampling line using the following cleaning protocol:

1. Clean using hot tap water.
2. Clean using Alconex cleaning solution.
3. Clean using tap water.
4. Clean using a 10% Hydrochloric Acid rinse.
5. Clean using distilled water.

Areas Not Requiring a Response

The Pristine Facility was an old hazardous waste incinerator. The company closed in 1981. The site is approximately 2.3 acres. Past operations resulted in ground water contamination at the site. The site cleanup started in 1997. Contaminated ground water is collected from one deep extraction well and 30 shallow wells associated with the soil vapor extraction system.

The ground water treatment system consists of a pretreatment tank where sulfuric acid is added, an air stripper and cartridge filters. Several other tanks designed for various uses are currently used to hold the ground water prior to these treatment units.

Permit #: 1IN90002*BD
NPDES #: OHD000002

A review of the Discharge Monitoring Reports (DMRs) for January 2011 through January 2013 indicated one permit violation. This violation is shown below and has been adequately addressed by the facility. All future violations must continue to be reported as required by the Discharge Permit as detailed in Part III, Section 12 titled "Noncompliance Notification." Another option to reporting these violations is to submit an electronic reporting form. This form and a fact sheet may be found at the following web site: <http://epa.ohio.gov/dsw/permits/individuals.aspx>. Please look at the section titled "Non-Compliance Notification." Regardless of which method the facility chooses, the violation reports should be directed to your Ohio EPA, DSW contact who is Joshua Jackson.

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
December 2011	Methylene Chloride	Monthly	ug/l	5.0	5.2

A review of the DMRs for the noted period indicated that the average and peak flow rates were 79,100 gpd and 184,100 gpd.

All wastewater samples are placed in sample containers that have the appropriate preservatives already provided. These sample containers are provided by Test America. The sample containers are immediately taken to Test America where they are tested.