



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

April 15, 2013

Re: Scioto County
 Haverhill Chemicals
 Compliance Evaluation Inspection
 OIF00009, OH0007391
 Correspondence (IWW)

Mr. Jason E. Patrick, Regional Env. Supt.
 P.O. Box 180
 1019 Haverhill-Ohio Furnace Road
 Haverhill, Ohio 45636-0180

Dear Mr. Patrick:

On March 13, 2013, I conducted a compliance evaluation inspection at Haverhill Chemicals located in Haverhill, Ohio. I was accompanied by Tim Fulks from this office and Ashley Ward of our Central Office. Paul O'Neill and you represented Haverhill Chemicals. The purpose of the site visit was to determine Haverhill's compliance with NPDES Permit Number OIF00009*ND and the Ohio Water Pollution Control Act, Revised Code Chapter 6111.

As a result of the inspection and review of our files, I have the following comment:

- PART III, 3(A) of the Permit states, *"All wastewater treatment works shall be operated in a manner consistent with the following: At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit."*

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00552	Oil and Grease, Hexane	1D Conc	10.0	13.	6/21/2012
001	00552	Oil and Grease, Hexane	1D Qty	65.480	94.1144	6/21/2012
001	00552	Oil and Grease, Hexane	1D Qty	65.480	74.1019	9/5/2012
001	00400	pH	1D Conc	6.5	6.1	11/25/2012
603	00530	Total Suspended Solids	30D Conc	45.3	46.	1/1/2013

There have been permit limit violations since the last inspection. Haverhill Chemicals has taken the appropriate actions to maintain the facility in compliance with all terms and conditions of the NPDES permit and should continue to do so. Also, we discussed the renewal of your NPDES permit that is currently being drafted in our central office.

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 and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (614) 644-3469 or me at 740-380-5227 for additional information.

Sincerely,



Scott Foster
Environmental Specialist II
Division of Surface Water

SF/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
OIF00009*ND	OH0007391	March 13, 2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Haverhill Chemicals P.O. Box 180 1019 Haverhill-Ohio Furnace Road Haverhill, Ohio 45636-0180	9:45 am	August 1, 2011
	Exit Time	Permit Expiration Date
	1:00 pm	July 31, 2013
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Jason Patrick, Regional Superintendent Environmental	740-533-5267	
Name, Address, and Title of Responsible Official	Phone Number	
Steve Isaacs, Plant Manager P.O. Box 180 1019 Haverhill-Ohio Furnace Road Heverhill, Ohio 45636-0180	740-532-3420	

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

Section D: Summary of Findings (attach additional sheets if necessary)			
See Attached Letter			
Inspector		Reviewer	
	4/16/13		4/16/13
Scott Foster Division of Surface Water Southeast District Office	Date	Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	Date

Sections E through 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) 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 Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations Y
- (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

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
[All]
- (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.)
[Software]
- (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
- (h) Any plant upsets since last inspection Y

Comments/Status:

Repaired center wall in clarifiers, 1/13.(h)

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
- (c) How much sludge storage is provided at the plant
Sludge system is operated 5 days a week.
- (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 Y
If so, what is the name of the contractor
Allied Waste- Green Valley

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained Y
Type of device (e.g., weir with ultrasonic level sensor):
001-Bubbler System
- (b) Calibration frequency adequate Y
Date of last calibration:
603-2/8/13 001-2/11/13
- (c) 24-hour recording instruments operated and maintained Y
- (d) Flow measurement equipment adequate to handle full range of flows Y
- (e) Actual flow discharged is measured Y
- (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 Y
- (b) Do SOP's include the following if applicable Y

- | | |
|----------------------------------|-----------------------------|
| • Title | • Procedure |
| • Scope and Application | • Calculations |
| • Summary | • Quality Control |
| • Sample Handling & Preservation | • Maintenance |
| • Interferences | • Corrective Action |
| • Apparatus and Materials | • Reference (Parent Method) |
| • Reagents | |

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 (see score from GLC page) Y
- (h) Commercial laboratory used Y

Parameters analyzed by commercial lab: **All permit parameters except Cl₂, pH, Temperature.**
 Lab name: **Summit Environmental Tech.- Cuyahoga Falls, Ohio**

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling Y
Date: **8/30/2012**
- (b) Were any parameters "Unsatisfactory" Y
- (c) Reasons for "Unsatisfactory" parameters

pH solution bad.

Comments/Status:

Performed remedial samples, satisfactory.

Section J: Effluent/Receiving Water Observations

Outfall #: **001**

Outfall Description: **Main Plant Outfall**

Receiving Stream: **Ohio River**

Receiving Stream Description: -----

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: