



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

April 22, 2013

Re: Noble County
Ames True Temper - Dexter City
Compliance Inspection
OGS00030, OHGS00060
Correspondence (PWW)

Ms. Tina McCarthy, EHS
Ames True Temper, Inc.
465 Railroad Avenue
Camp Hill, PA 17011

Dear Ms. McCarthy:

On April 10, 2013 I conducted a Compliance Evaluation Inspection (CEI) of the Ames True Temper wastewater treatment plant. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES Permit Number OGV00030*AG. Jeff Sanford and Art Schockling 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 2011 March February 2013 shows violations for ammonia, fecal coliform and dissolved oxygen (DO) (see attached data).
2. Part IV, Item G of your permit states, "Effluent disinfection is not directly required. However, the permittee is required to meet all applicable discharge permit limits." The facility has not been in compliance with fecal coliform limits during the last two annual sampling events. Currently, no disinfection equipment is installed at the plant. You will need to install disinfection equipment in order to come into compliance with the fecal coliform limits.
3. The facility's issues with meeting ammonia limits is likely due to the lack of a return activated sludge (RAS) line from the clarifier. Without returning sludge from the clarifier to the aeration tank, an adequate population of microorganisms in the aeration tank cannot survive. This is why the mixed liquor in the aeration tank appeared very thin and watery. This population of microorganisms is necessary to breakdown the influent ammonia.

4. The low DO results are likely due to the DO not being tested at the time of collection. Currently the facility collects the samples and then delivers them to the lab and the DO is analyzed at the lab. The hold time for dissolved oxygen is 15 minutes. By the time the sample gets to the lab and is analyzed, it's likely that some of the DO has been consumed and will result in a lower reading compared to if the DO was measured at the time of collection. If DO limits are still not being met when analyzing at the time of collection, a post aeration system may need to be added.
5. During the inspection the sand filters were ponding. The absence of a sludge return line means all the solids in the system are accumulating in the clarifier. If solids are not wasted out of the clarifier, the only place for them to go is onto the sand filters, resulting in clogged filters. Mr. Sanford indicated during the inspection that solids are not wasted from the system.
6. The effluent from the clarifier was being applied to both sand filters simultaneously. The splitter box should be used to alternate flow between the two beds. One sand filter should be used at a time. Once the filter becomes clogged and no longer drains, flow should be switched to the second sand filter and the first filter should then be cleaned.
7. **Part IV, Item H(3)(a)** of the NPDES permit requires the permittee to ensure that the treatment works operator of record is physically present at the facility in accordance with the minimum staffing requirements per paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code. The operator needs to maintain an operator log book. The log book should identify the treatment works, the date and time the operator was present, include a daily record of operation and maintenance activities, and identify the person making the entries.
8. **Part IV, Item I** of the NPDES permit requires the placement of a permanent marker on the receiving water bank at each outfall regulated under the NPDES permit. During the inspection no sign was observed at outfall 001. Please place a sign at the outfall in accordance with the requirements of the NPDES permit.

Please address and provide a response to items #2 through 8 within thirty (30) days upon receipt of this letter. Per Ohio Administrative Code 3745-42-02, you must obtain a permit to install before installing any additional treatment or modifying the existing treatment.

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 at (740) 380-5418 or by email at tim.fulks@epa.ohio.gov.

Sincerely,



Timothy A. Fulks
District Representative
Division of Surface Water

TF/dh

Enclosure

c: Arthur Schockling, Operator of Record

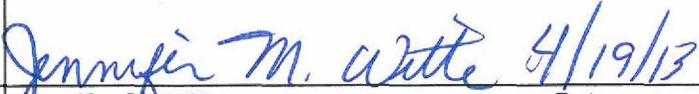


State of Ohio Environmental Protection Agency
Southeast District Office

Semi-Public NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
OGS00030*AG	OHGS00060	April 10, 2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ames True Temper - Dexter City Plant 62825 Country Home Road Lore City, Ohio 43755	11:45 a.m.	November 1, 2010
	Exit Time	Permit Expiration Date
	12:30 p.m.	December 31, 2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jeffrey A. Sandford, Western District Log Buyer	(740) 783-1162	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Arthur Schockling	(740) 782-4652	
Name, Address, and Title of Responsible Official	Phone Number	
Tina M. McCarthy, Environmental, Health & Safety Office 465 Railroad Avenue Camp Hill, PA 17011	(717) 730-5776	

Section D: Summary of Findings (attach additional sheets if necessary)	
See attached letter.	
Inspector	Reviewer
	
4/19/13	4/19/13
Timothy A. Fulks Division of Surface Water Southeast District Office	Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office
Date	Date

Average Daily Design Flow:	1000 Gallons/Day
Plant Serves:	Approximately 30 people
Average Daily Flow:	164 Gallons/Day
(Period of Review):	(January 2011 through December 2012)
Method of flow monitoring:	Water usage
Type of alarms for plant:	None

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **No**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

Secondary Treatment (Aeration)

Color of sludge: **Light Brown**
 Quality of sludge: **Thin**
 Foam: **None Present**
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Skimmers are operating	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input type="checkbox"/>	<input checked="" type="checkbox"/>			

Maintenance of aerating equipment is: **Good**

Comments/Status:

The system does not have a sludge return line from the clarifier resulting in a watery mixed liquor in the aeration tank. Without a sludge return line from the clarifier, an adequate microorganism population cannot exist in the aeration tank to break down waste.

Secondary Treatment (Settling)

Clarity: **Clear**
 Condition of Weir: **Clean**
 Weir is level: **Yes**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Good**

Comments/Status:

Tertiary Treatment

	Yes	No		Yes	No
Surface sand filters:	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of settling components is: **Poor**

Comments/Status:

Sand filters were observed to be ponding during the inspection.

Sludge Handling/Storage Disposal

Hauler name: Buckey
 Disposal site: Caldwell WWTP
 Sludge wasted from: Sludge has not been wasted
 How often is sludge wasted: N/A
 Sludge drying beds: **No** Sludge holding tank: **No**

Overall maintenance of settling components is: **Poor**

Comments/Status:

Sludge needs to be wasted on a routine basis so that the solids are not constantly clogging the sand filters.

Record Keeping/Operator of Record

- (a) Wastewater Treatment Works classification (OAC 3745-7) A
- (b) Operator of Record holds unexpired license of class required by Permit Y
- (c) Copy of certificate of Operator of Record displayed on-site N/A
- (d) Has the Operator of Record submitted an ORC Notification form..... Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7) N/E
- (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 N
- (h) Format of log book (e.g. computer log, hard bound book)
- (i) Log book kept onsite (in an area protected from weather) N/E
- (j) Log book contains the following:
 - I. Identification of treatment works N/E
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 N/E
 - III. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.) N/E
 - IV. Laboratory results (unless documented on bench sheets) N/E
 - V. Identification of person making entries N/E
- (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:

(g) An operator of record log book is not being maintained

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Outfall 001**
Discharge is visible: **Yes**
Quality of Effluent: **Clear**

Comments/Status:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
0GS00030*CG	September 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.94	9/1/2011
0GS00030*CG	September 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.94	9/1/2011
0GS00030*CG	September 2011	001	31616	Fecal Coliform	30D Conc	1000	1590.	9/1/2011
0GS00030*CG	September 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	5.93	9/6/2011
0GS00030*CG	September 2012	001	31616	Fecal Coliform	30D Conc	1000	1680.	9/1/2012
0GS00030*CG	September 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	4.77	9/7/2012
0GS00030*CG	November 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	6.47	11/1/2012