



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

December 30, 2012

Mr. Mark Livengood, Manager
Eastern Regional Water Reclamation Facility
1850 Spaulding Road
Kettering, Ohio 45432

**RE: Montgomery County Eastern Regional Water Reclamation Facility
Compliance Evaluation Inspection, NPDES Permit No. OH0026590/ OEPA
Permit No. 1PL00001*MD**

Dear Mr. Livengood:

On December 18, 2012, I conducted an NPDES Compliance Evaluation Inspection at the Eastern Regional Water Reclamation facility. Tom Gault, Technical Specialist and Operator of Record, and you were present for the Facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the Facility's NPDES permit.

All of the areas that were evaluated received a "Satisfactory" rating. No actions are recommended at this time. A copy of the inspection report is enclosed.

If you have any questions, please contact me by phone at (937) 285-6028 or by email at michelle.waller@epa.state.oh.us.

Respectfully,

A handwritten signature in blue ink that reads "Michelle Waller".

Michelle Waller
Environmental Specialist II
Division of Surface Water

Enclosures

MW/tb

ec: Tom Gault – Eastern Regional WRF (w/enclosures)



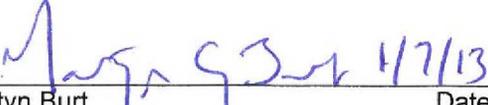
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PL00001*MD	OH0026590	12/18/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Eastern Regional Water Reclamation Facility 1802 Spaulding Road Kettering, Ohio 45432	10 AM	05/1/2009
	Exit Time	Permit Expiration Date
	12 PM	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Tom Gault, Technical Specialist and Operator of Record Mark Livengood - Manager	(937) 496-7096 (937) 781-2559	
Name, Address and Title of Responsible Official	Phone Number	
Mark Livengood - Manager 1850 Spaulding Road Kettering, Ohio 45432	(937) 781-2559	

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	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Please see attached report.	
Inspector	Reviewer
 Michelle Waller Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
1/7/13 Date	1/7/13 Date

Sections E thru 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) 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
in permit..... Y
- (f) 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..... Y
- (e) Compliance schedule contained in...NPDES Permit Compliance Schedule
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Compliance scan was done from 4/11 to 11/12. The following violations were reported:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	001	Total Suspended Solids	7D Conc	30	33.	5/22/2011
May 2011	001	Total Suspended Solids	7D Qty	1478	1822.34	5/22/2011
September 2011	001	E. coli	7D Conc	189	316.125	9/22/2011

Noncompliance notifications were submitted for the above violations. No further action is necessary.

Eastern Regionals permit contains a compliance schedule for phosphorus. Eastern Regional is having no problem meeting the phosphorus limit, and have been keeping the ferric feed down to be more efficient for phosphorus.

g.) The result of biomonitoring done the second week of November was non-detect.

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.....

Eastern Regional has two generators. The entire facility is powered by the generators.

ii. How often is the generator tested under load.....

The generators are tested under load one time per month.

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

Pumps and blowers. Eastern Regional is working to install audible alarms through SCADA. Expected to be done in 2013.

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

CMMS systems (computer), and work orders placed by operators. Preventative maintenance is included.

(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:

The company 360 Water out of Columbus, Ohio has been placed under a 5 year contract to make an electronic version of the Operation and Maintenance manual for both Eastern and Western Regional. It will be put online, and have tests for the operators which will count for contact hours.

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

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

(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..... Y
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

SCADA is used for the log book for operators. Operator of Record, Tom Gault, has his own hard bound book.
- (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)... Y
 - v. Identification of person making entries..... N
- (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) v.- SCADA shows the initials, time and from what computer the operator made the comments. The separate log book that the Operator of Record uses is not initialed. **Start putting in initials daily when entries are made into the hard bound log book used by the Operator of Record.**

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 0
 - ii. How many pump stations have telemetered alarms..... 1
 - iii. How many pump stations have operable alarms..... 1

- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N
- (d) Are there CSOs in the collection system..... N
if so, what is the LTCP status.....

- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options
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- (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..... Y
- (j) Is any portion of the collection system at or near dry weather capacity..... N

Comments/Status:

The pump station is located at the Walnut Grove golf course.

I&I work – lots of lining has been done. \$10 million per year is spent on repair and replacement.

Nicole Diak is the contact for collections information.

i.) The WIB response plan involves a supervisor going out on the call. Approximately 7 jet vacs are available to clear problems.

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	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% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent 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)

	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% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	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 checked="" 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..... Y

(c) How much sludge storage is provided at the plant.....

60 days worth of sludge storage at Eastern Regional, 120 days of sludge storage on the floor at Western Regional.

(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..... Y

(g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

(h) Is a contractor used for sludge disposal..... Y

If so, what is the name of the contractor.....

Synagro.

Comments/Status:

b.) The sludge volume has gone down at Eastern Regional because they are flushing the trickling filters more often to keep down the snail production. By flushing more often, the biomass is thinner, resulting in less snails. The smaller amount of snail shells has resulted in the sludge volume decreasing. Sludge is hauled to Western Regional to be held if needed. A covered facility exists at Western.

Section I: Self-Monitoring Program

Flow Measurement:

(a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

Parshall flume with ultrasonic.

(b) Flow meter calibrated annually Y

(Date of last calibration: 11/12/12)

(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
(see GLC page)

(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..... Y
- (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
(see score from GLC page)
- (h) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: Priority Pollutants

Lab name: Test America

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
Date: 5/2011
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

d.) Use of a LDO was approved by USEPA on December 22, 2011.

Most analysis for Eastern Regional is done at the Montgomery County Environmental Lab. Test America closed their Dayton lab in November, and sends everything with short holding times to the Montgomery County Environmental Lab.. Parameters with longer hold times go to Test America in Canton. Montgomery Environmental Lab is now doing low level Hg

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Final effluent.

Receiving Stream: Little Beaver Creek

Receiving Stream Description: Slight foam.

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?