



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

June 13, 2013

Mr. James Percival, City Manager
City of Xenia
101 North Detroit Street
Xenia, Ohio 45385

**RE: Xenia Ford Road WWTP/ Compliance Evaluation Inspection, NPDES Permit
No. OH0028193/OEPA Permit No. 1PD00015*KD**

Mr. Percival:

On June 12, 2013, Megan Zale (Ohio EPA – Central Office) and I conducted a NPDES Compliance Evaluation Inspection at the Xenia Ford Road Wastewater Treatment Works. Edward Walker, Wastewater Supervisor, Todd Page, Operator 1, and Bernie Winner, Operator 1, were present. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's NPDES Permit. All areas evaluated received a "Satisfactory" rating.

The solar project onsite is fully operational. When fully powered, the solar array can supply enough power to operate the whole treatment plant.

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

Sincerely,

Michelle Waller
Environmental Specialist
Division of Surface Water

MW/kb

cc: Edward Walker, Wastewater Supervisor
Megan Zale, OEPA/CO/DSW



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
1PD00015*KD	OH0028193	6/12/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Xenia Ford Road WWTP 779 Ford Road Xenia, Ohio 45358	10:00 AM	5/1/2009
	Exit Time	Permit Expiration Date
	12:15 PM	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Edward Walker, Wastewater Supervisor Todd Page, Operator 1 Bernie Winner, Operator 1	(937) 376-7271 (937) 376-7271 (937) 376-7271	
Name, Address and Title of Responsible Official	Phone Number	
James Percival, City Manager 101 North Detroit Street Xenia, Ohio 45385	(937) 376-7231	

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
<i>Michelle Waller</i> <i>6/14/13</i>	<i>Martyn Burt</i> <i>6/14/13</i>
Michelle Waller Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date	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:

Xenia submitted the permit renewal for Ford Road November 15, 2012.

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... N/A
- (c) Permittee is taking actions to resolve violations..... N/A
- (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:

f.) Xenia submitted the annual Phosphorus Loading Reduction report on April 4, 2013.

Permit compliance was checked from January 2012 to May 2013. No effluent or frequency violations were reported. In January and February 2013 two "A" code violations were reported ("AF") as the sampling locations were frozen over.

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.....

Everything can be operated by the generator.

ii. How often is the generator tested under load.....
The generator is tested under load once per month.

(b) Which components have an alarm system available for power or equipment failures.....
Everything at the plant is alarmed (SCADA).

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

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

(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..... Y

(g) Operator of Record log book provided..... Y

(h) Format of log book (e.g. computer log, hard bound book)
Hard bound book with consecutive numbered pages.

(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:

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..... 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.).....
- (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:

I&I – The trunk main from Tallow Road to Hawkings is being replaced and the manholes are being raised.

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 B Sewage Sludge (monitoring station 581)

(b) Has amount of sludge generated changed significantly since the last inspection..... N

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% 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"/>

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

120 days.

- (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..... Y
- (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, Inc.

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

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

Magmeter on influent.

- (b) Flow meter calibrated annually Y
(Date of last calibration: 3/13)
- (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..... 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) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, hardness, TKN, TDS, O&G, Nitrite/Nitrate

Lab name: Belmont Labs, Jones and Henry

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
Date: Waiting for the most recent results
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Pipe to stream

Receiving Stream: Little Miami River

Receiving Stream Description: Discharge was clear, no oil, foam or grease observed.

Comments/Status:

The restoration project along the bank of the Little Miami River near Outfall 001 appears to be holding well.

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:

