



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

August 14, 2013

Mr. Lyle Bloom, P.E., Director of Utilities  
Clermont County Water Resources Department  
4400 Haskell Lane  
Batavia, Ohio 45103

**RE: Arrowhead Park WWTP, NPDES Permit No. 1PH00014\*JD / OH0049310  
Compliance Evaluation Inspection**

Dear Mr. Bloom:

On Wednesday, July 24, 2013, I conducted a Compliance Evaluation Inspection at the above referenced facility. Bill Beyer, and Dave Pigg represented Clermont County during the inspection. The purpose of the inspection was to evaluate plant operation and performance. A copy of the inspection report is enclosed. As indicated in the attached report, there was one area evaluated during the inspection that was rated as "Unsatisfactory."

The area designated as "Facility Site Review" received an "unsatisfactory" rating due to the bulbs in the UV light disinfection system being exposed during operation at the time of the inspection. Operating UV bulbs that are exposed pose a major eye safety issue. Provisions need to be made at once to secure covering or some other protective measures for these UV lights in order to protect the eye sight of workers at this plant.

Please provide this office with a written description of any actions, either taken or proposed, to address this situation. This written description should include the dates, either actual or proposed, for completion of these actions. Please provide this office with this written response within thirty days of receipt of this letter.

If you have any questions regarding this report, please contact Mr. Ware at (937) 285 - 6098.

Sincerely,

Martyn Burt  
Compliance and Enforcement Supervisor  
Division of Surface Water

MB/kb

cc: Bill Beyer, Clermont County Water Resources Department  
Dwight Culbertson, Clermont County Water Resources Department  
Dave Pigg, Clermont County Water Resources Department



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
1PH00014*JD	OH0049310	07/24/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Clermont County - Arrowhead Park WWTP 6783 Branch Hill Guinea Pike Loveland, Ohio 45140	9:25 AM	May 1, 2012
	Exit Time	Permit Expiration Date
	10:10 AM	April 30, 2017
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Bill Beyer, WSD Supervisor David Pigg, Operator		(513) 831 - 8124
Name, Address and Title of Responsible Official		Phone Number
Lyle Bloom, P.E., Director of Utilities Clermont County Water & Sewer District 4400 Haskell Lane Batavia, Ohio 45103		(513) 732-8860

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
U	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>The UV light disinfection unit was in operation at the time of the inspection, but the UV bulbs were not covered. Uncovered and operating UV bulbs are a major eye safety issue. Provisions need to be made at once to secure covering or some other protective measures for these UV bulbs in order to protect the eye sight of plant workers. For this reason, the "Facility Site Review" section of this report was given a rating of "Unsatisfactory."</p>	
Inspector	Reviewer
<p>Ron Ware 8/14/13 Date</p>	<p>Martyn Burt 8/14/13 Date</p>
<p>Ron Ware Division of Surface Water Southwest District Office</p>	<p>Martyn Burt Compliance &amp; Enforcement Supervisor Division of Surface Water Southwest District Office</p>

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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... N
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described  
 in permit..... Y

**Comments/Status:**

A UV light disinfection system was installed at the Arrowhead Park plant within the past year.

**Section F: Compliance**

- (a) Any effluent violations over the past year ..... 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

**Comments/Status:**

(a) & (b) The following violations occurred in Sept. 2012

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.05	9/20/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.06	9/21/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.6	9/22/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.7	9/23/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.6	9/24/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.7	9/25/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.7	9/26/2012
Sept. 2012	001	Chlorine, Total Residual	1D Conc.	0.038	0.7	9/27/2012

The reason given for these violations was the use of the wrong chemical in the de-chlorination process (aluminum sulfate instead of sodium bisulfate). A drum of aluminum sulfate was sent to the Arrowhead Park plant by mistake. Instead of correcting the problem, the plant operators at the time intentionally reported incorrect effluent data for Total Residual Chlorine for the reporting period in question and possibly earlier. The Clermont County Water Resources Department has taken disciplinary action against the plant operators who were involved with this incident. A UV light disinfection system has since been installed at the Arrowhead Park plant.

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed ..... N
- (b) Are adequate alarm system available for power or equipment failures..... Y
- (c) All treatment units in service other than backup units..... Y
- (d) Any major equipment breakdown since last inspection..... N
- (e) Operation and maintenance manual provided and maintained..... Y
- (f) Any plant bypasses since last inspection..... N
- (g) Any plant upsets since last inspection..... N

**Record Keeping/Operator of Record:**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Has the Operator of Record submitted an ORC Notification form.. Y
- (d) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (e) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (f) Operat or of Record log book provided..... Y
- (g) Format of log book (e.g. computer log, hard bound book)
 

Hard bound book.
- (h) Log book kept onsite (in an area protected from weather)..... Y
- (i) 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
    - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... N
    - ii. Laboratory results (unless documented on bench sheets)... N
    - iii. Identification of person making entries..... Y
- (j) 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

**Section G: Operation & Maintenance con't**

**Collection System:**

- (a) Are there pump stations in the collection system..... Y  
 (There is 1 pump station in the collection system for this facility)
  - 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..... Y
- (d) Portable pumps available for collection system maintenance..... Y
- (e) RDII Program established and active..... Y
- (f) Any WIB complaint received since last inspection..... N
- (g) Is there a WIB response plan..... Y
- (h) Are any portions of the collection system at or near dry weather capacity..... N

Comments/Status:

**Treatment Works:**

(a) A portable generator is available for use at the plant. Buckeye Power also provides emergency power to the plant and the one lift station in the collection system. The plant also has a surge tank to collect flows during short term power outages.

**Record Keeping/Operator of Record:**

(i) Preventative maintenance records and laboratory results are kept in separate log books.

**Section H: Sludge Management**

- (a) Method of Sludge Disposal...
  - Land Application
  - Haul to Another NPDES Permittee
  - Haul to a Mixed Solid Waste Landfill
- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....  

There are 4,000 gallons of aerobic storage at the facility.
- (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) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A

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- (g) Is a contractor used for sludge disposal..... Y  
If so, what is the name of the contractor.....

SOS Sanitation

**Comments/Status:**

**Section I: Self-Monitoring Program**

**Flow Measurement:**

Primary/Secondary flow measuring device

Weir with ultrasonic level sensor.

- (a) Flow meter calibrated annually ..... Y  
(b) 24-hour recording instruments operated and maintained..... Y  
(c) Flow measurement equipment adequate to handle full range  
of flows..... Y  
(d) All discharged flow is measured..... Y

**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  
(e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: Low level mercury, metals

Lab name: Pace Analytical Services

**Comments/Status:**

**Section J: Effluent/Receiving Water Observations**

Outfall # 1PH00014001

Outfall Description: Plant outfall to tributary of the Little Miami River

Receiving Stream: Tributary of the Little Miami River

Receiving Stream Description: Warm Water Habitat, Primary Contact Recreation

**Comments/Status:**