



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

September 5, 2013

Mr. Jeff Wright
City Manager
City of Milford
745 High Street
Milford, Ohio 45150

**RE: Milford WWTP, NPDES Permit No. 1PC00005*HD / OH0020451
Compliance Evaluation Inspection**

Dear Mr. Wright:

On Thursday, August 22, 2013, Mr. Ron Ware of this office conducted a Compliance Evaluation Inspection at the above referenced facility. The city of Milford was represented by you and David Walker, the Operator of Record for this facility. The purpose of the inspection was to evaluate plant operation and performance. As indicated in the attached report, all of the areas that were evaluated during the inspection received "Satisfactory" ratings. No response or corrective action is required at this time.

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

Enclosure

cc: David Walker, City of Milford

MB\bp



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
1PC00005*HD	OH0020451	08/22/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Milford WWTP 100 Bay Road Milford, Ohio, Clermont County	12:48 PM	September 1, 2010
	Exit Time	Permit Expiration Date
	2:14 PM	January 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jeff Wright, City Manager Dave Walker, Operator of Record	(513) 831 - 4192 (513) 831 - 6982	
Name, Address and Title of Responsible Official	Phone Number	
Jeff Wright, City Manager City of Milford 745 High Steet Milford, Ohio 45150	(513) 831 - 4192	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement		
S	Records/Reports	S	Laboratory		
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal		
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

Inspector	Reviewer
Ron Ware Date: 9/5/2013	Martyn Burt Date: 9/5/13
Ron Ware Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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

Comments/Status:

Section F: Compliance

- (a) Any 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

Comments/Status:

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2012	pH, Minimum	1D Conc	6.5	6.47	8/6/2012
April 2013	Oil & Grease, Hexane	1D Conc	10	11.4	4/1/2013

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.....

The entire facility.
 - ii. How often is the generator tested under load.....

Once a week.

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

The entire facility

- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

Maintenance is scheduled on major equipment after a set number of hours of operation.
- (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)..... II
- (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..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

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)... 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
(There are 8 pump stations in the collection system for this facility)
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 1
 - ii. How many pump stations have telemetered alarms..... 8
 - iii. How many pump stations have operable alarms..... 8
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... Y
- (d) Are there CSOs in the collection system..... N
if so, what is the LCTP status.....

N/A

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

N/A

- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... Y
- (h) Any WIB complaint received since last inspection..... Y
- (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:

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| <ul style="list-style-type: none">(a) The type of alarm system used is an auto -dialer.(f) Portable pumps for collection system maintenance are available through a service contract. |
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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 392,000 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
- (g) Is a contractor used for sludge disposal..... Y
If so, what is the name of the contractor.....

Utter Construction

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

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

Parshall flume ahead of chlorine contact tank.
- (b) Flow meter calibrated annually Y
- (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
- (e) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (f) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (g) Analyses being performed more frequently than required by permit. N
- (h) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (i) Satisfactory calibration and maintenance of instruments/equipment. N
- (j) Other laboratories used Y
Parameters analyzed by other labs:
CBOD₅, ammonia nitrogen, nitrates & nitrites, oil & grease, total phosphorus, E coli (Clermont County Water Resources lab)

Sludge analyses (Utter Construction)

Effluent metals, oil & grease (hexane extractable), Total kjeldahl nitrogen (Pace Analytical Services)

Low Level Mercury (Mercury One)

Quality Control/Quality Assurance

- (k) Quality assurance manual provided and maintained..... Y
- (l) Satisfactory calibration and maintenance of instruments/equipment. Y
- (m) Adequate records maintained..... Y
- (n) Results of latest USEPA quality assurance performance sampling program:

Satisfactory Marginal Unsatisfactory

Comments/Status:

(n) Two of the tested parameters (CBOD₅, and ammonia nitrogen) were initially rated as "unacceptable." The laboratory that provided the results (Clermont County Water Resources lab) re-ran the tests. The second set of test results was found to be "acceptable."

Permit #: 1PC00005*HD
NPDES #: OH0020451

Section J: Effluent/Receiving Water Observations

Outfall # 1PC00005001

Outfall Description: Effluent to East Fork of the Little Miami River

Receiving Stream: East Fork of the Little Miami River

Receiving Stream Description: Warm Water Habitat, Primary Contact Recreation

Comments/Status:

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