



State of Ohio Environmental Protection Agency

Southwest District Office401 E. Fifth St.
Dayton, Ohio 45402TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.usTed Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 25, 2008

Fernald Preserve
Attn: Mr. Frank Johnston
10995 Hamilton-Cleves Highway
Harrison, Ohio 45030RE: Fernald Preserve CAWWTP/Compliance Evaluation Inspection
NPDES Permit No. OH00009580/ OEPA Permit No. 11O00004*GD

Dear Mr. Johnston:

On August 25, 2008, I conducted an NPDES Compliance Evaluation Inspection at the Fernald Preserve Converted Advanced Waste Water Treatment Plant. Cathy Glassmeyer and Mary Sizemore were present representing the facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

No actions are recommended at this time. A copy of the inspection report is enclosed.

As of January 1, 2006, the Fernald Preserve was switched from a major facility to a minor facility.

Thank you and your staff for the time extended during the inspection process. If you have any questions, please contact me by phone at (937) 285-6028 or by e-mail at michelle.waller@epa.state.oh.us.

Respectfully,

A handwritten signature in cursive script that reads "Michelle Waller".

Michelle Waller
Environmental Specialist II
Division of Surface Water

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 |
| 11O00004*GD | OH0009580 | 8/25/2008 | C | S | 4 |

| Section B: Facility Data | | |
|---|----------------------------------|------------------------|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| U.S. DOE Fernald Preserve 7400 Willey Road Harrison, Ohio 45013 | 1:20pm | 7/1/2003 |
| | Exit Time | Permit Expiration Date |
| | 2:37pm | 6/30/2008 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Cathy Glassmeyer, Process Engineer Mary Sizemore, Environmental Compliance | (513) 648-5927 (513) 648-3166 | |
| Name, Address and Title of Responsible Official | Phone Number | |
| Frank Johnston, Fernald Site Manager | (513) 648-5294 | |

| 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 | N | Compliance Schedule |
| S | Operations & Maintenance | S | Effluent/Receiving Waters | S | Self-Monitoring Program |
| S | Facility Site Review | N | Sludge Storage/Disposal | N | Other |
| N | Collection System | | | | |

| Section D: Summary of Findings (Attach additional sheets if necessary) | | | |
|--|--|-------------------------------------|--|
| | | | |
| Inspector | | Reviewer | |
| <i>Michelle Waller</i> | | <i>Martyn G. Burt</i> | |
| Michelle Waller | | Martyn Burt | |
| Division of Surface Water | | Compliance & Enforcement Supervisor | |
| Southwest District Office | | Division of Surface Water | |
| | | Southwest District Office | |
| Date: 9/25/08 | | Date: 9/25/08 | |

Permit # : 11O00004*GD
NPDES #: OH0009580

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) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Permit renewal application was submitted December 28, 2007.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... N/E
- (b) Permittee is taking actions to resolve violations..... N/A
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Review period 8/1/2006 - 8/1/2008.
1 effluent violation since switching to groundwater pump and treat and long term care of the On-Site Disposal Facility operations only in 2006.
Noncompliance report was submitted for effluent violation.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... III
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site.... N/A
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Hard bound book.
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) 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 operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification 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..... N/A

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
(c) Sludge adequately disposed..... N/A
(Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... N/A
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... N/A
(g) Adequate sludge storage provided at plant.....N/A
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... N/A
(j) Any complaints received in last year regarding sludge..... N/A
(k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
(Date of last calibration: 7/7/2008)
- (c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

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
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) 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
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: See comments below.

Lab name: GEL Laboratories, LLC

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: 7/2008

Comments/Status:

Monitoring records kept onsite for 1 year, then sent to records storage. Process control sampling for Total U.

Section J: Effluent/Receiving Water Observations

| Outfall Number | Oil sheen | Grease | Turbidity | Visible Foam | Visible Floating Solids | Color | Other |
|----------------|-----------|--------|-----------|--------------|-------------------------|-------|-------|
| 4001 | None | None | None | None | None | | |
| | | | | | | | |
| | | | | | | | |
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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?

Comments/Status: