

# Tales from the Dark Side...

What Ohio EPA Wants to See During  
a Compliance Inspection

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**We want to see this:**



# Not this!



05/03/2008

**We want to see this:**



**Not this!**



Or this!



This is good...

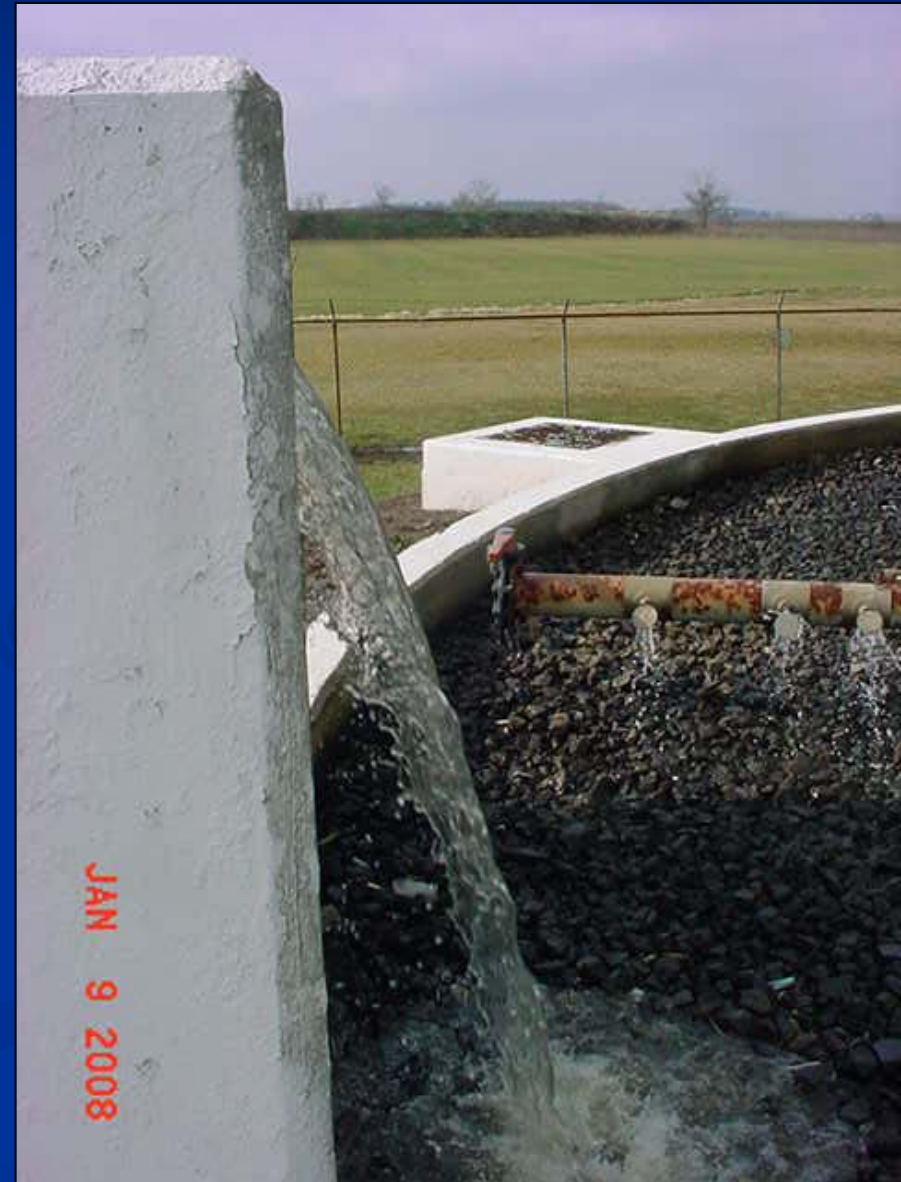


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# This is bad!



**We love innovative solutions, but  
don't want to see short cuts...**



# Inspection Goal

Assess compliance with terms and conditions of the NPDES permit

## Inspection checklist

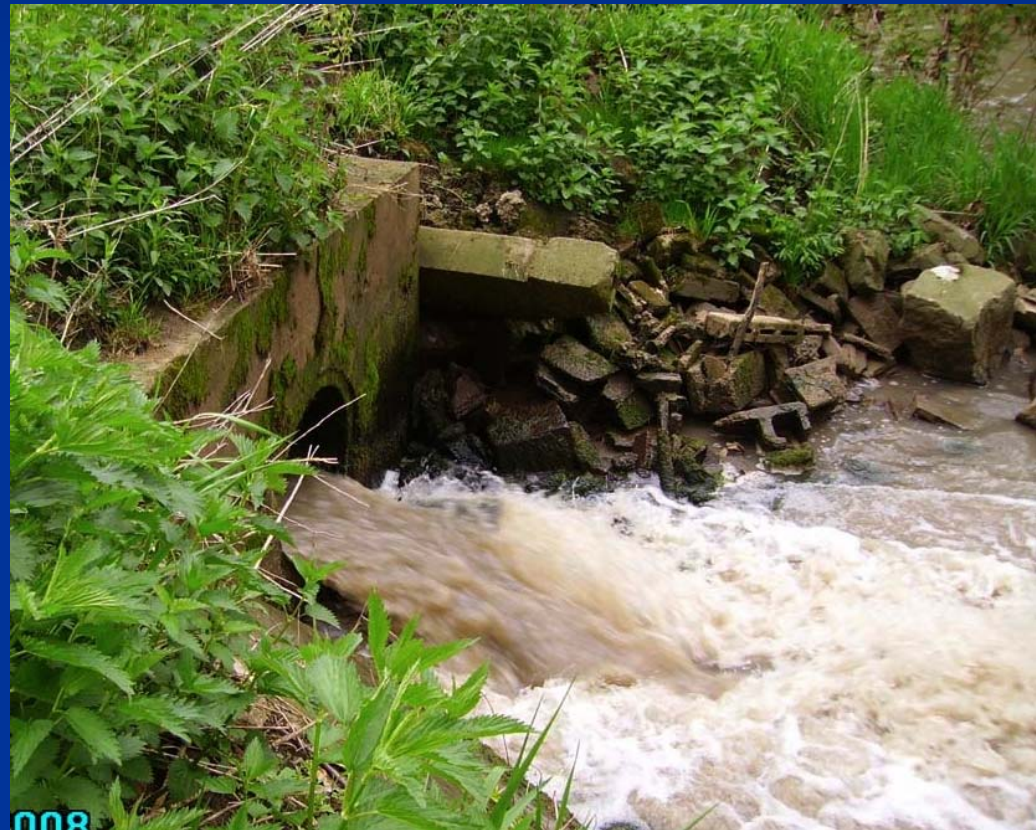
Walk through entire process and observe the outfall(s)

# Major areas of evaluation

- Permit verification
- Compliance schedules/violations
- Operation and Maintenance
- Sludge Management
- Effluent/Receiving Water
- Self-Monitoring Program
  - Flow measurement
  - Sampling
  - Lab

# Permit Verification

- Correct receiving stream named
- New treatment units added
- Treatment units out of service
- Changes in the nature, volume of discharge
- All outfalls/discharges permitted



# Compliance Schedules/Violations

- Verify status of compliance schedule milestones
- Review Discharge Monitoring Reports for limit/frequency violations or reporting errors
- Ensure all bypasses/overflows/violations reported within 24 hours
  - <http://epa.ohio.gov/dsw/permits/permits.aspx>



**DIVISION OF SURFACE WATER**  
**Non-compliance Notification for**  
**Bypasses and Upsets**

Use this form to report non-compliance that is the result of any **unanticipated bypass** or **upset** resulting in an exceedance of any **effluent limit** in your NPDES permit (see Part III, Section 12 of your NPDES permit for details). The form should be completed and emailed to the appropriate Ohio EPA inspector, or Ohio EPA office using one of the following addresses:

- Southeast District Office: [sedo24hournpdes@epa.state.oh.us](mailto:sedo24hournpdes@epa.state.oh.us)
- Southwest District Office: [swdo24hournpdes@epa.state.oh.us](mailto:swdo24hournpdes@epa.state.oh.us)
- Northwest District Office: [nwdo24hournpdes@epa.state.oh.us](mailto:nwdo24hournpdes@epa.state.oh.us)
- Northeast District Office: [nedo24hournpdes@epa.state.oh.us](mailto:nedo24hournpdes@epa.state.oh.us)
- Central District Office: [cdo24hournpdes@epa.state.oh.us](mailto:cdo24hournpdes@epa.state.oh.us)
- Central Office: [co24hournpdes@epa.state.oh.us](mailto:co24hournpdes@epa.state.oh.us)

**On a case-by-case basis it may be determined an environmental emergency exists. Report environmental emergencies within thirty (30) minutes of discovery to Ohio EPA 24-hours a day, 365 days a year at 800-282-9378!**

<b>Permittee Information</b>	
Name of permittee:	
NPDES Permit number:	
Contact name for permittee:	
Contact telephone number:	
<b>Date and time of discharge</b>	
Date and time(s) of discharge:	
Date and time discharge discovered:	
<b>Description of discharge</b>	
Approximate amount of discharge:	
Characteristics of discharge:	
<b>Stream(s) affected by discharge</b>	
Provide the name of all streams affected by the discharge:	
<b>Circumstances that created the discharge</b>	
Describe the circumstances that created the discharge:	
<b>Contact person with knowledge of discharge (if different than above)</b>	
Name:	
Telephone number:	
<b>Remedial steps</b>	
Describe all remedial steps which are or will be taken to address the discharge:	
<b>Person responsible for implementing remedial steps</b>	
Name:	
Telephone number:	



**Division of Surface Water**  
**Non-compliance Notification for**  
**Exceedance of a Daily Maximum Discharge Limit**

Use this form to report non-compliance that is the result of any violation of a **daily maximum discharge limit** for any of the pollutants listed by the Director in your NPDES permit (see Part III, Section 12 of your NPDES permit for details). The form should be completed and e-mailed to the appropriate Ohio EPA inspector, or Ohio EPA office using one of the following addresses:

- Southeast District Office: [sedo24hournpdes@epa.state.oh.us](mailto:sedo24hournpdes@epa.state.oh.us)
- Southwest District Office: [swdo24hournpdes@epa.state.oh.us](mailto:swdo24hournpdes@epa.state.oh.us)
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- Central Office: [co24hournpdes@epa.state.oh.us](mailto:co24hournpdes@epa.state.oh.us)

<b>Permittee Information</b>	
Name of permittee:	
NPDES Permit number:	
Contact name for permittee:	
Contact telephone number:	
<b>Exceeded limit</b>	
Parameter name:	
Provide type of limit exceeded, e.g. concentration, loading, etc.	
<b>Extent of exceedance</b>	
Provide permit limit, e.g. 10 ug/l	
Measured exceedance (include units):	
<b>Cause of exceedance</b>	
Provide an explanation for the cause of the permit limit exceedance:	
<b>Period of exceedance</b>	
Exact time period of exceedance (include times and dates):	
<b>If uncorrected, expected duration</b>	
If the exceedance is not yet corrected, provide the expected time period during which it is anticipated to continue:	
<b>Steps to address exceedance</b>	
Describe all the steps taken to reduce, eliminate, or prevent future occurrence of the exceedance(s):	

# Operation and Maintenance Treatment Works

- Verify standby power is available
- Adequate alarm systems
- All major treatment units in service/status of repairs
- All bypasses since last inspection documented
- Adequate staff and minimum staffing time

# Certified operators

- Notify the Director of the identity of the operator of record
- Record keeping
  - Up to date
  - Bound book with numbered pages, computer logs, time cards, O and M records
  - Protected from weather
  - Accessible ON SITE 24 hours/day containing minimum of previous 3 months' activities

# Log Book

- Date and time of arrival/departure of ORC
- Specific O and M activities that affect the effluent
- Results of tests performed and samples taken that are not documented on lab sheets
- Preventative maintenance activities
- Requests for equipment repairs
- Identification of person making entries

# Operation and Maintenance Collection System

- Basic overview of collection system.
- Percent combined system
- Amount of overflows since last inspection
- CSOs monitored and reported properly
- LTCP implementation on track



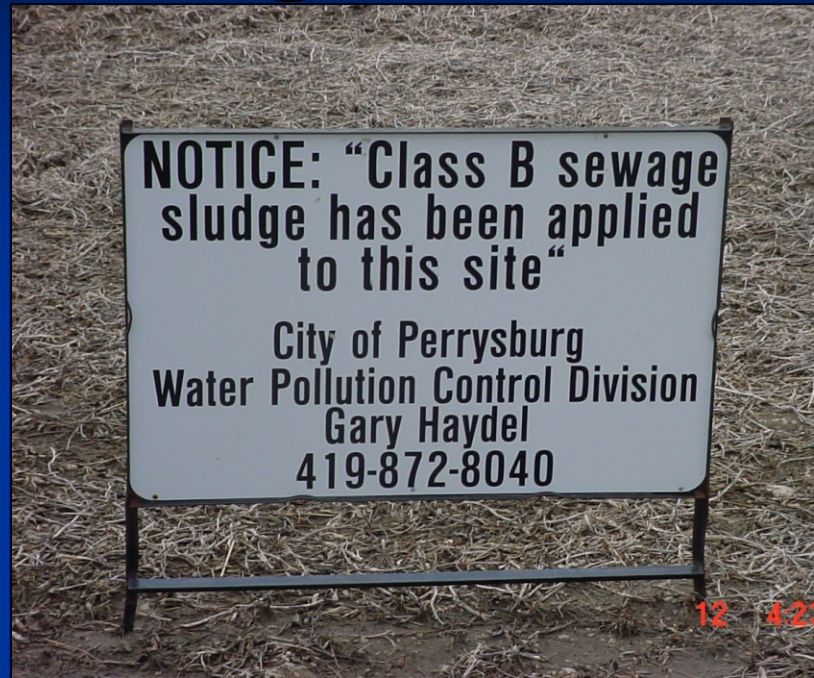
# Operation and Maintenance Collection System



- Use of portable pumps
- Inflow/infiltration issues
- Basement backups
- Available sewer capacity
- Detailed CSO community inspections

# Sludge Management

- Basic overview of program
- Sludge disposed according to rules
- Has the amount of sludge generated changed?
- Document complaints
- Adequate sludge storage/treatment



# Effluent/Receiving Water

- Observation of each outfall
- Observation of receiving stream
- Verify presence of outfall sign



# Self-Monitoring Program

## Flow Measurement

- Type of flow meter
- Is there ink in the pen that documents the flow?
- Cover the expected range of flow
- Proper location
- Calibration frequency



# Self-Monitoring Program Sampling

Proper sampling, followed by quality analytical work, is the essential tool to verify permit compliance.

# Self-Monitoring Program Sampling

- Sampling points as described in permit and representative
- Parameters, sampling frequency and type agree with permit
- Chain of custody forms
- Refrigeration of samples during collection verified with a working thermometer

# Self-Monitoring Program Sampling

- Proper preservatives used
- Proper sample containers and holding times
- Monitoring records maintained for 3 years



# Self-Monitoring Program Laboratory

General overview of lab documentation.

If problems are suspected, Ohio EPA lab personnel will be requested to perform a detailed Performance Audit Inspection

Proper O and M includes adequate laboratory controls and appropriate quality assurance procedures

# Self-Monitoring Program Laboratory

“Garbage in equals garbage out”

Compliance decisions, design decisions, and next  
NPDES permit all depend on plant data.

Data readily available to the public

# Self-Monitoring Program Laboratory

- Focus on documentation of correct methods for common parameters
  - CBOD or BOD
  - TSS
  - Ammonia
  - Total Residual Chlorine
  - E. coli or fecal coliform
  - pH
  - Dissolved oxygen



# Self-Monitoring Program Laboratory

- Written SOP for all analyses and sample collection and handling with reference to 40 CFR 136
- Documentation of equipment calibration and maintenance
- Document use of a contract lab
- Documentation of test blanks and QA/QC tests
- Condition of lab and glassware

# Self-Monitoring Program Laboratory

- Review dates on lab chemicals
- Bench sheets written in ink
- All data, bench sheets and calibration records must be kept for at least 3 years
- Review latest DMR-QA results
- Review chain of custody

Documentation! Documentation!



# Inspection follow up

- Within 30 days, a letter is sent to city/village officials
- Inspection date, purpose, names of those involved
- Summary of findings and violations
- Recommended corrective actions with timeframe for completion
- Completed inspection checklist



# Pointers

- Be honest. If you don't know the answer, say so
- Let us know what you want the Mayor to know
- Don't be afraid to ask the inspector questions
- Review the inspection report when you get it and let the inspector know if there are errors
- Let us know if you need more time to correct a deficiency
- Use your district EPA inspector as a resource

# Significant Noncompliance

- Two or more significant violations of monthly average effluent limitations in a six-month period
- Based on technical review criteria
- Four violations of any magnitude (significant or insignificant) in a six month period
- Failure to meet a compliance schedule date within ninety days

# Significant Noncompliance

- Applies to both majors and minors
- Reported on Quarterly Noncompliance Report
- U.S. EPA's watchlist
- Ohio EPA enforcement action
- Current focus on minor noncompliance

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