

# Facility Inspections – A Cooperative Effort

Doug Clark, Superintendent BG WWTP

Elizabeth Wick, P.E., Manager, Ohio  
EPA, NWDO

# Environmental Compliance Goals

- Our goals are the same!
  - Achieving compliance
  - Reducing potential for violations and penalties
  - Reducing costs and using resources wisely
  - Helping preserve natural resources

We all want to see this



Not this!



We both love it when the final clarifier looks like this!



Not like this!



Or like this.



We both hate responding to a situation like this.



# TRUST

Ohio EPA develops the NPDES permit based on water quality standards, technology based limits and existing effluent quality.

Entity must monitor and self report

NPDES permits are self policing

# TRUST

Inspections help verify quality of reporting

If needed, Ohio EPA will take enforcement!



# Enforcement creates

- Lots of paperwork for both parties
- Lots of time
- These two equal lots of money
- Begins a downward spiral of partnership

# Inspections create

- Openness of operations
- Sharing mutual concerns
- Time to talk face to face
- Helps develop a good working *partnership* between the permit holder and regulator.

# Inspection process

Opening meeting



Facility walkthrough



Records review



Closing meeting



Letter

# Opening meeting

- Get to know each other
- Discuss kids, weather, sports, etc.
- What's been going on at the plant
- What's been going on at the EPA

# Facility walk through

- Your chance to show off your plant
- Start at beginning and go through whole plant
- If something out of service, explain why
- Show off new equipment
- Brag about new method of operation
- Brag about your staff

## Doug Clark

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From: Doug Clark  
Sent: Tuesday, February 03, 2009 5:38 PM  
To: 'Patricia.Tebbe@epa.state.oh.us'; 'Alex.Smaili@epa.state.oh.us'; 'Elizabeth.Wick@epa.state.oh.us'  
Cc: Paul Brock; Kevin Maynard; John Bella  
Subject: Re: Filter Project

See you then. Please bring hardhats if you have them.  
Doug

----- Original Message -----

From: Patricia Tebbe <[Patricia.Tebbe@epa.state.oh.us](mailto:Patricia.Tebbe@epa.state.oh.us)>  
To: Doug Clark; Smaili, Alex <[Alex.Smaili@epa.state.oh.us](mailto:Alex.Smaili@epa.state.oh.us)>; Wick, Elizabeth <[Elizabeth.Wick@epa.state.oh.us](mailto:Elizabeth.Wick@epa.state.oh.us)>  
Sent: Tue Feb 03 16:00:56 2009  
Subject: Re: Filter Project

Doug

We'd like to come over on Wednesday around 1:30 - 2:00 if that's a good time.

Pat

>>> "Doug Clark" <[DClark@bgohio.org](mailto:DClark@bgohio.org)> 2/2/2009 8:30 am >>>

Hi All,

If you would like to see the various stages of the filters Wed. of Thurs. of this week would be a good time. We should have media installed in one filter and different stages of the rest so you can see the "nuts & bolts" of how they are designed and will function. Feel free to bring anyone who may be interested.

Sincerely,

Douglas P. Clark  
WPC Superintendent  
City of Bowling Green  
P 419-354-6275  
F 419-354-1521  
M 419-409-6332  
E [douglas.clark@bgohio.org](mailto:douglas.clark@bgohio.org)

# Facility walkthrough



Observe final outfall  
Honestly explain situation



# Records review

- Monitoring data
- Lab documentation
  - Chain of custody
  - Calibration records
  - Bench sheets

# Closing meeting

- Inspector shares observations/issues
- Superintendent voices concerns/issues
- Decide on plan of action

# Letter

- Should follow in 30 days
- Summary of findings and observations
- Violations
- Recommended corrective action and timeline
- Completed inspection checklists

# Letter

- Review the letter and checklists
- Let inspector know if anything is in error
- Request more time to respond if needed
- Inform others of the findings/recommendations

# Typical violations

- Installing new equipment/sewers without a permit to install
- Failure to follow the monitoring frequency in the NPDES permit
- Failure to ensure proper sampling techniques
- Failure to properly operate and maintain equipment
- Failure to notify Ohio EPA of known violations



CITY OF BOWLING GREEN - OFFICE OF MUNICIPAL UTILITIES

304 North Church Street  
P.O. Box 388  
Bowling Green, Ohio 43402

Phone: (419) 354-6246  
Fax: (419) 353-4783  
E-Mail: [bgmudir@wcnnet.org](mailto:bgmudir@wcnnet.org)

December 3, 2007

Patricia Tebbe  
Ohio EPA, NWDO  
347 N. Dunbridge Road  
Bowling Green, OH 43402

RE: Incident ID: 0711-87-4380

Dear Pat,

This letter is a follow up to a minor septage spill that I reported to the OEPA hotline (ID# 0711-87-4380) at approximately 14:45 on November 29, 2007. Immediately after reporting to the hotline, I left a message on your voice mail, as you were not available at the time.

On November 29, 2007 at approximately 14:30 a septic hauler was offloading at our septage receiving station when it was observed that the primary septage holding tank was overflowing on the ground. With the information I had at the time of the report, it appeared that a minor amount may have entered Poe ditch and I felt it prudent to report it immediately. Mr. Mike Gerber of Ohio EPA, NWDO Emergency Response Team, along with me, determined that, *in fact no discharge to Poe Ditch occurred*. Fortunately, the Collection Department's vactor truck was onsite, in conjunction with the immediate response from the City of Bowling Green's Water Pollution Control personnel and the Collection Department's personnel, *no discharge occurred to Poe ditch*.

Although no discharge occurred, I have listed (in bulleted form) the chain of events that occurred.

- Septage hauler unloading observed tank overflowing and shut down operations.
- Septage hauler notified WPC plant personnel of the situation.
- Plant personnel along with collections personnel immediately assessed the situation and plugged off the catch basin used to drain the electrical tram that the septage overflowed into.
- Then the catch basin, along with the electrical tram was emptied out with the City's vac truck.
- During this period I notified OEPA of the spill, as it was reported to me that some septage most likely entered Poe ditch.
- Mike Gerber from Ohio EPA NWDO emergency response came to the WPC plant and together it was concluded that no septage entered Poe ditch.

Once again, even though *no discharge to Poe ditch occurred*, the City of Bowling Green WPC will investigate some type of early warning system or some type of containment system to ensure that if an event like this were to happen again, it could not possibly enter into Poe ditch.

If you have any questions please feel free to contact me at (419) 354-6274.

Sincerely,

Douglas P. Clark  
WPC Superintendent  
City of Bowling Green

Cc: Elizabeth Wick  
Kevin Maynard  
Paul Brock

# WWTP responsibilities

- Be honest. If don't know the answer, admit it
- What units are out of service and why
- Have operators continue to do what they normally do.
- Introduce your staff to Ohio EPA representative
- Use the inspector as a resource
- Don't be afraid to ask questions

# Ohio EPA responsibilities

- Be honest. If you don't know the answer, admit it.
- Ask why units are out of service.
- Be up front about upcoming changes.
- Be up front about inspection observations.
- Don't be afraid to ask questions.

# Cooperative efforts

- Communicate with Ohio EPA before trying something
- Lay out the consequences of trying
- Have a series of meetings
- Give the strategy to Ohio EPA
- Follow the strategy

COMMUNICATE !

## Doug Clark

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From: Patricia Tebbe <Patricia.Tebbe@epa.state.oh.us>  
Sent: Monday, October 01, 2007 9:26 AM  
To: Doug Clark  
Subject: Re:

Follow Up Flag: Follow up  
Flag Status: Completed

Thank you for the notice.

>>> "Doug Clark" <[dclark@bgohio.org](mailto:dclark@bgohio.org)> 10/1/2007 8:57:47 am >>>

Hi Pat,

Starting later today we will have aeration basins out of service for long overdue maintenance. All the numbers indicate that there should be no adverse effects on final effluent quality. If for some reason we experience problems with meeting NPDES permit I will let you know.

Sincerely,

Douglas P. Clark

WPC Superintendent

City of Bowling Green

Ph. 419-354-6274 Ext 6701

Cell 419-409-6332

Fx. 419-354-1521

email [douglas.clark@bgohio.org](mailto:douglas.clark@bgohio.org)

# Cooperative Efforts

- Update Ohio EPA on progress regularly
- Keep monitoring the situation
- Continue to remove I/I from system
- Try a pilot system without really installing anything

# Cooperative Efforts

- Continuous communication builds trust between EPA and city
- Allow free thinking and leads to innovation
- May even save the city money

COMMUNICATE !

## **Doug Clark**

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**From:** Patricia Tebbe <Patricia.Tebbe@epa.state.oh.us>  
**Sent:** Monday, March 16, 2009 4:12 PM  
**To:** Doug Clark  
**Cc:** Alex Smail; Wick, Elizabeth  
**Subject:** WWTP odors  
**Attachments:** Text.htm

Doug

I know that along with the WWTP improvements, you have been battling high flows recently and we appreciate you and your staff's efforts to keep the WWTP in compliance.

However, it is the unfortunate bane of being located just down the street from Ohio EPA that when the WWTP has an odor problem, everyone here knows the source of the odors and who to complain to in Surface Water. I have to admit that the complaints, along with the odors, have been fairly regular but have increased in intensity lately.

This email is a heads up to let you know that I plan to send a letter to you in the next week or two to request that a plan be submitted to us on investigating and eliminating odor problems at the WWTP.

As always, if you have any questions or comments, please feel free to contact Elizabeth, Alex, or myself.

Pat Tebbe  
Ohio EPA  
Division of Surface Water

COMMUNICATE !

## Doug Clark

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Subject: RE: UV non-compliance notice

From:  
Sent: Friday, October 29, 2010 10:00 AM  
To: Doug Clark  
Subject: Re: UV non-compliance notice

Thanks Doug, I will take care of this.

>>> "Doug Clark" <[DClark@bgohio.org](mailto:DClark@bgohio.org)> 10/21/2010 11:18 PM >>>

Today I received a non-compliance letter from XXXXXX for the UV project. Attached are the non-compliance letter, notification of construction start and notification of substantial completion. If you need more/different documentation than what I have already submitted, please let me know & I will accommodate. If possible, can you contact XXXXXXXX to inform him that we have been in compliance with our permit?

THANKS !

Sincerely,

Douglas P. Clark

WPC Superintendent

City of Bowling Green

P 419-354-6275

F 419-354-1521

C 419-409-6332

E [douglas.clark@bgohio.org](mailto:douglas.clark@bgohio.org) <<mailto:douglas.clark@bgohio.org>>

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COMMUNICATE !

## Doug Clark

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**From:** Doug Clark  
**Sent:** Friday, March 18, 2011 7:54 AM  
**To:** Patricia Tebbe  
**Subject:** TMDL

Hi Pat,

I just wanted to thank you for your positive comments on what we have been doing here during the TMDL meeting.  
Thank you !!!!

Sincerely,

Douglas P. Clark  
WPC Superintendent  
City of Bowling Green  
P 419-354-6275  
F 419-354-1521  
C 419-409-6332

E [douglas.clark@bgohio.org](mailto:douglas.clark@bgohio.org)

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THANK YOU !

QUESTIONS ???