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!
Compliance

NPDES Permit

Record Keeping

Inspection

Reporting

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

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>
To: Doug Clark; Smaili, Alex <Alex.Smaili@epa.state.oh.us>; Wick, Elizabeth <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@bgsuohio.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
F douglas.clark@bgsuohio.org

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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
December 1, 2007

Patricia Tobe
Ohio EPA, NWDO
347 N. Donbridge Road
Bowling Green, OH 43402

Subject: Incident ID: 071.1.87-4380

On November 20, 2007 at approximately 14:30 a septic hauler was offloading at our sewage receiving station when it was observed that the primary sewage holding tank was overflowing on the ground. With the information I had at the time of the report, it appeared that an unknown 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 vacuum 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 bullet form) the chain of events that occurred:

- Septic hauler unloading observed tank overflowing and shut down operations.
- Septic hauler obtained WPC plant personnel of the situation.
- Plant personnel along with collection personnel immediately assessed the situation and plugged off the catch basin used to drain the electrical tank that the septic overflowed into.
- Then the catch basin, along with the electrical tank was emptied out with the City’s vac truck.
- During this period I notified OSEA of the spill, as it was reported to me that some septic 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 septic 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) 154-6774.

Sincerely,

Douglas P. Clark
WPC Superintendent
City of Bowling Green

Cc: Elizabeth Wick
Kevin Maynard
Paul Bick
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

From: Patricia Tebbe <Patricia.Tebbe@cpa.state.oh.us>
Sent: Monday, October 01, 2007 9:28 AM
To: Doug Clark
Subject: Re:
Follow Up Flag: Follow up
Flag Status: Completed

Thank you for the notice.

>>> "Doug Clark" <dc Clark@beohio.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 F. 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
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

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

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

Subject: RE: UV non-compliance notice

From:
Sent: Friday, October 23, 2010 10:00 AM
To: Doug Clark
Subject: Re: UV non-compliance notice

Thanks Doug, I will take care of this.

>>> "Doug Clark" <DC@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

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COMMUNICATE !
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 419-354-8276
F 419-354-1521
C 419-409-8332
E douglas.clark@bogio.org

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THANK YOU!

QUESTIONS ???