



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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WATER POLLUTION CONTROL  
DIVISION

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AIKEN EQC OFFICE

MAY 05 2016

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RETURN RECEIPT REQUESTED

Mr. Glen Trofatter  
Director, Water Pollution Control Division  
Bureau of Water  
South Carolina Department of Health  
and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Re: Overview Evaluation of the South Carolina Department of Health and Environmental Control – Midlands Environmental Quality Control Aiken Regional Office


Dear Mr. Trofatter:

The purpose of this letter is to transmit the National Pollutant Discharge Elimination System (NPDES) Overview Evaluation of the South Carolina Department of Health and Environmental Control, Midlands EQC Aiken Regional Office, which was conducted by staff from the U.S. Environmental Protection Agency's Science and Ecosystem Support Division Region 4 on February 16-18, 2016.

The overall NPDES field program activities were evaluated and found to be satisfactory. However, please note the comments, which are provided to improve the overall NPDES inspection program. A report documenting the Overview Evaluation is enclosed for your review.

If you should have any further questions, please contact Ms. Mary Mattox at (404) 562-9733 or via email at [mattox.mary@epa.gov](mailto:mattox.mary@epa.gov).

Sincerely,

  
Alenda E. Johnson, Acting Chief  
Municipal & Industrial Enforcement Section  
Clean Water Enforcement Branch

Enclosure

United States Environmental Protection Agency  
Region 4

Science and Ecosystem Support Division  
980 College Station Road  
Athens, Georgia 30605-2720



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**NPDES State Overview Evaluation**  
**South Carolina Department of Health and Environmental Control**  
**(SCDHEC)**

**Midlands EQC Aiken Office**  
**206 Beaufort St. NE**  
**Aiken, South Carolina, 29801**

**Overview Dates: February 16-18, 2016**

**SESD Project ID: 16-0265**

**Requestor: Maurice Horsey, Chief**  
Municipal & Industrial Enforcement Section  
Clean Water Enforcement Branch  
Water Protection Division  
USEPA – Region 4  
61 Forsyth St. SW  
Atlanta, Georgia 30303-8960

**Project Leader: Jairo Castillo, P.E.**  
Enforcement Section  
Field Services Branch  
Science and Ecosystem Support Division  
USEPA- Region 4  
980 College Station Road  
Athens, Georgia 30605-2720

**Title and Approval Signature Page**

Title: NPDES State Overview Evaluation Report

Aiken Office, Aiken, South Carolina

Final Report

Prepared by:

[Redacted Signature]

Date:

4/19/2016

Jairo Castillo, P.E., Environmental Engineer  
Enforcement Section  
Field Services Branch  
EPA Region 4

Approved by:

[Redacted Signature]

Date:

4/19/2016

Mike Bowden, Chief  
Enforcement Section  
Field Services Branch  
EPA Region 4

**NPDES State Overview Evaluation  
South Carolina Department of Health and Environmental Control  
EQC Aiken Office**

**INTRODUCTION**

During the week of February 16, 2016, Jairo Castillo of the United States Environmental Protection Agency (USEPA) conducted a National Pollutant Discharge Elimination System (NPDES) Overview Evaluation of the SCDHEC Environmental Quality Control (EQC) Office in Aiken, South Carolina. The overview was conducted as part of the Memorandum of Agreement (MOA) with the EPA Region 4 Water Protection Division. The EQC Aiken Office is located at 206 Beaufort St NE Aiken, South Carolina. The overview included the following:

- Interviewing office personnel responsible for scheduling, planning, and conducting NPDES inspections
- Reviewing records regarding: (a) NPDES program personnel, (b) personnel training and qualifications, (c) NPDES self-monitoring equipment, and (d) equipment maintenance and storage
- Observing office personnel conducting two NPDES inspections

**SUMMARY AND RECOMMENDATIONS**

The overall NPDES program was evaluated as satisfactory. Two inspectors are currently dedicated to conducting all NPDES related activities. As part of the overview, the following inspections were conducted:

**Table 1: NPDES Compliance Inspections**

Inspection Type	Field Office	Facility Name	Inspector(s)
Compliance Sampling Inspection	Aiken	Town of Wagener WWTF 151 Woodshore Drive Wagener, SC, 29164 NPDES Permit No. SC0026204	Travis Fuss/Robert E. Wilhite, III
Compliance Evaluation Inspection	Aiken	Kimberly Clark Corporation Beech Island Mill 246 Old Jackson Highway Beech Island, SC NPDES Permit No. SC0000582	Travis Fuss

The following comments are provided to improve the overall NPDES inspection program:

- The EQC Aiken Office should continue to be proactive in training the staff involved in conducting NPDES inspections.
- During inspections, the EQC staff should check the operators conducting equipment calibration procedures.
- The EQC staff should use individual bound logbooks/checklists to document the state inspections to prevent loss or alteration of field documentation.

### **MIDLANDS EQC AIKEN OFFICE PROGRAM**

#### **1. Staffing Review/Workload**

Table 2 shows the NPDES personnel, their position, educational background, and the years of experience in the environmental program. The NPDES inspection personnel spent approximately sixty percent of the time conducting NPDES related work activities. In addition, each inspector responds to complaints related to NPDES facilities and/or water quality issues. A yearly project list was assigned to inspection personnel. The staff scheduled and conducted inspections on a timely basis in order to complete assignments. Table 3 below shows the workload conducted by the **Montgomery Office** during the FY2015 inspection year. Based on the workload conducted by the Office during 2014-2015 period, the office meets the Memorandum of Agreement with the USEPA Region 4 for the period.

**Table 2: EQC Aiken Office-NPDES Personnel**

<b>Personnel</b>	<b>Position</b>	<b>Education</b>	<b>Experience (yrs.)</b>
Travis R. Fuss	EHM III, Team Leader (Supervisor)	B.S. Environmental Management	14
Robert E. Wilhite, III	EHM I	B.S. Exercise Science	8

**Table 3: FY2015 EQC Aiken Office Workload Activities**

<b>Activities</b>	<b>District Office Work</b>
Total Permitted NPDES Facilities in District (All, including NPDES general permits)	32
Number of Counties in District Office Jurisdiction	4
<b>Total Permitted Industrial Facilities In The District</b>	15
Major	4

Activities	District Office Work
Minor	11
<b>Total Permitted Municipal Facilities</b>	17
Major	2
Minor	15
Other Permitted Facilities (SID Permits)	-
Activities Conducted Last Inspection Year	
Complaints	35
Major Industrial – CEI	2
Minor Industrial – CEI	6
Major Municipal – CEI	2
Minor Municipal – CEI	4
Major Industrial – CSI*	0
Minor Industrial – CSI*	1
Major Municipal – CSI*	1
Minor Municipal – CSI*	1
PAIs (Major Municipal)	0
Oil & Grease	0
Reconnaissance inspections	0
Other	0

**Requirements:** Every 2 years = 100% majors (minimum 50% yearly)

Every 5 years = 100% minors (minimum 20% yearly)

\*Aiken = Total: 6 Majors- Requirements: 50% = 3

Amount inspected: 4 CEIs, CSI

26 Minors- Requirements: 20% = 5

Amount inspected: 10 CEIs, 2 CSIs

## 2. Training

The initial training for the NPDES personnel consisted of in-house and on-the-job training (OJT) activities. Training included basic inspector training for personnel conducting NPDES compliance inspections, HAZWOPER 8-hr refresher, office trainings (EQC Standard Operating Procedures (EQC) Annual Refresher, etc.), and personal safety training. Training also included NPDES workshops when available.

### **3. Inspection Procedures**

Generally, unannounced inspections were conducted for all NPDES inspections. The EQC inspectors were familiar with the NPDES inspection requirements. The inspections were conducted in a satisfactory manner. The inspectors demonstrated professionalism and excellent communication skills, explaining compliance issues with facility managers and plant operators. Field notes were written primarily on unbound check sheets that included all the components necessary to conduct a complete NPDES inspection. Inspection findings were identified during the walk-through and summarized at the end of the inspection. The compliance inspection procedures consisted of the following components:

- opening conference
- walk-through
- sampling review
- flow measurement review
- records review
- closing conference
- reporting

EPA recommends the use of individual bound logbooks to prevent loss and/or alteration of field information.

### **4. Reports**

The inspection reports had not been completed at the time this overview report was finalized. SESD will review the reports to ensure the findings are included.

### **5. Sampling**

The EQC staff collected two 24-hour composite samples (effluent) with an automatic sampler. Both samples were collected at the Wagener WWTP; one sample collected on February 17, 2016 and the second sample on February 18, 2016. Samples were delivered to the in-house Midlands EQC Aiken Laboratory for analysis and reporting. Sample handling, preservation, and chain-of-custody records activities were satisfactory.

### **6. NPDES Equipment**

All NPDES supplies, including monitoring equipment, sample containers, and preservatives were adequate. Inspectors were assigned one vehicle from the motor pool for conducting NPDES related activities. The sampling staff coordinated equipment decontamination, cleaning, and storage of instrumentation used in the investigation.

Table 4 shows the equipment used by the EQC staff to conduct NPDES sampling activities. All field equipment appeared to be in satisfactory and operational condition.

**Table 4: ADEM Montgomery Office- Field Equipment**

Brand	Model	Equipment Type	Quantity
HACH	PC 1	Pocket Colorimeter	5
HACH	PC 11	Pocket Colorimeter	4
ISCO	3710	Composite Sampler	4
ISCO	4230	Bubbler Flow Meter	4
YSI	550 A	DO Meter	1
YSI	55	DO Meter	3
Orion	230 A+	pH Meter	2
Orion	Star A221	pH Meter	2

**7. Work Area/Storage Space**

The Midlands Aiken EQC Office had adequate workspace for equipment maintenance, equipment calibration, and storage. The office storage area was approximately 415 square feet.

End of Report