

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

October 19, 2011

Re: Ross County
City of Chillicothe
Pretreatment
Pretreatment Compliance Inspection

Mayor and Council
City of Chillicothe
Municipal Building
35 South Paint Street
Chillicothe, Ohio 45601

Dear Mayor and Council:

On August 30, 2011, I conducted a pretreatment compliance inspection of the City of Chillicothe's pretreatment program. Thomas Burnett, Pretreatment Coordinator, represented the City during the inspection. The inspection was conducted to evaluate the City's compliance with state and federal pretreatment regulations, and to evaluate the overall effectiveness of the program in achieving environmental goals. Required actions, recommendations, and comments are listed below:

Required Actions:

1. Haverhill North Coke Company was added to the Chillicothe pretreatment program during the past year. The company has contracted to haul blowdown wastewater from its coke oven gas heat recovery scrubber system to the City of Chillicothe. Chillicothe reported it had issued a discharge permit to the company in April 2011, however, there was no signed copy of the effective permit in the City's records. The company has discharged an average of 12,000 gpd during recent months. We observed the discharge of a 6000 gallon tanker load to the Chillicothe sewer at the Marietta Road pump station on the date of the inspection. The permit requires quarterly sampling, but no samples had been collected as of the inspection date. The City should ensure the samples are collected at the frequencies specified in the permit using the appropriate methods of 40 CFR 136. Please also provide a signed copy of the Haverhill North Coke Company discharge permit to Ohio EPA to demonstrate compliance with 40 CFR 403.8(f) and 40 CFR 403.12(o).
2. Chillicothe should review Part 1.C, Paragraph A of its NPDES permit and follow the appropriate compliance schedule option(s) to address the permit's requirements for demonstrating compliance with the lower mercury limit. Available monitoring results for low level mercury at 001, which have been reported since the most recent permit became effective, were less than the NPDES permit final table mercury limit.

3. The City drafted a section for its sewer use ordinance to address proper regulation of discharges from food service facilities. The draft ordinance was revised in response to comments provided by Ohio EPA after the previous inspection. Ohio EPA has not seen the revised draft ordinance nor has it been adopted by the City. The city does not currently have all needed legal authority to enforce its pretreatment program as required in 40 CFR 403.8(f)(1) and OAC 3745-3-03(C). Please inform Ohio EPA of steps the City will take to include the required language in its ordinance.

Recommended Actions:

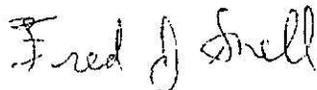
Ohio EPA promulgated revisions to the pretreatment regulations, known as the Streamlining Rule, in February 2007. Chillicothe is required to modify elements of its pretreatment program as a result of these changes. Information on the rule requirements is available at: http://cfpub.epa.gov/npdes/whatsnew.cfm?program_id=3. Chillicothe has not yet incorporated the streamlining revisions into its pretreatment program. Procedures for program modification requests are specified in OAC 3745-3-03(E). The City should submit a copy of the draft revisions to its pretreatment program to Ohio EPA, Southeast District Office, for review along with a pretreatment program modification request as soon as practical.

Comments:

We visited Herr Foods during the PCI. The facility has taken corrective measures to address high pH discharges during fryer cleaning operations in the past year. Fryer cleaning wastewaters are now routed to the sump pit, where they are neutralized using sulfuric acid. The pit wastewater batch is measured, and when it is found to be within a pH range of 6.0- 7.0 SU, the wastewater is pumped directly to the sewer, bypassing the dissolved air floatation unit. These corrective measures appear to have returned Herr Foods' discharge to full compliance with pretreatment standards.

Please respond to this letter in writing within 30 days. Should you have any questions or comments, please contact me at (740) 380-5423.

Sincerely,



Fred J. Snell
District Representative
Division of Surface Water

FJS/dh

Enclosure

- c: Thomas Burnett, Pretreatment Coord., Chillicothe WWTP (w/enclosure)
- c: Ryan Laake, Pretreatment Unit, DSW, CO (w/enclosure)

WENDB AND RNC WORKSHEET

PCI/Audit/RJ Checklist

FACILITY INFORMATION	
Name: City of Chillicothe	Date of Inspection: 8/30/11
OH Number: OH0024406	NPDES Number: OPD00003

I. WENDB DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	4	Annual	Annual	SIUS
Number of CIUs	1	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	0	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	0			PSNC
Number of SIUs in SNC with self-monitoring	0			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	9/23/85			
Technical Evaluation of Local Limits (Y/N) (Audit)	Y			
Adoption of technically-based limits (Y/N) (Audit)	Y			

II. RNC/SNC WORKSHEET

INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC

	RNC	Level	Reference	
			PCI	Audit
<input type="checkbox"/>	Failure to enforce against pass through and/or interference	I		
<input type="checkbox"/>	Failure to submit required reports within 30 days	I		
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days	I		
<input type="checkbox"/>	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.2.b	II.D.1.b
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.1	II.F.1
<input type="checkbox"/>	Failure to enforce pretreatment standards and reporting requirements	II		I.C.1
<input checked="" type="checkbox"/>	Other (specify) Insufficient legal authority	II		
SNC				
<input type="checkbox"/>	Control Authority in SNC for violation of any Level I criterion			
<input type="checkbox"/>	Control Authority in SNC for violation of two or more Level II criterion			