



**Environmental
Protection Agency**

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

October 19, 2011

Re: Washington County
City of Marietta
Pretreatment
Reconnaissance Inspection

Mayor and Council
City of Marietta
301 Putnam Street
Marietta, Ohio 45750

Dear Mayor and Council:

On September 22, 2011, I conducted a reconnaissance inspection of the City of Marietta's pretreatment program. Steve Elliott, Wastewater Superintendent, and Christy King, Chemist/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 pretreatment program in achieving environmental goals.

Comments generated during this inspection are listed below:

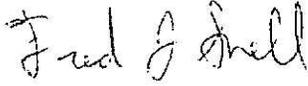
Comments:

1. Ohio EPA public noticed receipt of a pretreatment program modification request for revised industrial user limitations for the City of Marietta on August 18, 2011. The submittal included revised conventional pollutant limits for Broughton Dairy. The proposed revisions to Broughton's limits include both daily maximum and monthly average limits. Broughton Dairy currently monitors its effluent once per month. It is suggested the monitoring frequency should be increased to a minimum of weekly to enable Broughton to benefit from averaging samples to achieve compliance with the monthly average limit. Broughton would have the option of collecting more than the minimum number of samples.
2. Ohio EPA has determined that Marietta's proposed Streamlining revisions to its pretreatment program are non-substantial. The City should proceed with making the changes to the ordinance. Please send an electronic copy of the final ordinance to Ohio EPA after the changes to the ordinance have been approved by council.

City of Marietta
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Should you have any questions or comments, please contact me at (740) 380-5423.

Sincerely,

A handwritten signature in cursive script that reads "Fred J. Snell".

Fred J. Snell
District Representative
Division of Surface Water

FJS/dh

Enclosure

c: Christine King, Chemist/Pretreatment Coord., City of Marietta WWTP
c: Pretreatment Unit, CO

WENDB AND RNC WORKSHEET

PCI/Audit/RI Checklist

FACILITY INFORMATION

Name: City of Marietta	Date of Inspection: 9/22/11
OH Number: OH0026344	NPDES Number: OPD00016

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	3	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)	10/13/86			
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 type="checkbox"/>	Other (specify)	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			