



Environmental
Protection Agency

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

Re: Williams County
City of Bryan
Pretreatment

October 7, 2011

Mayor and Council
City of Bryan
103 North Beach Street
P. O. Box 190
Bryan, Ohio 43506

Dear Mayor and Council:

On September 27, 2011, a pretreatment compliance inspection (PCI) of the City of Bryan's approved pretreatment program was made. Mr. Ric Homier, Superintendent, was present and provided information about the implementation of the program. The inspection followed a checklist designed to evaluate major areas of the pretreatment program. The PCI findings are summarized below:

1. The City of Bryan currently has three significant industrial users (SIU's) and two of them are categorical.
2. All three SIU's are currently operating under effective permits which are renewable every four years.
3. The file of Titan Tire was reviewed as part of the PCI.
4. The City is conducting sampling and inspections of all industrial users per the approved pretreatment program.
5. The City appears to be adequately implementing the approved pretreatment program.

The completed inspection checklist is enclosed for your records. If you have any questions, please call Jason Ko at 419-373-3021.

Sincerely,

Elizabeth Wick, P.E.
WQ Engineer/Section Manager
Division of Surface Water

/llr

Enclosures

pc: Ric Homier, City of Bryan, w/Enclosures
Ryan Laake, DSW-CO, w/Enclosures
DSW-NWDO File





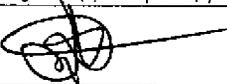
PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME: City of Bryan	PERMIT NUMBER: OH0020532	FACILITY NUMBER: 2PD00018
INSPECTION TYPE: P	INSPECTOR: S	FACILITY TYPE: P
		DATE CONDUCTED: 9/27/2011

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY City of Bryan 1521 Evansport Road Bryan, Ohio 43506
MAILING ADDRESS OF FACILITY City of Bryan P O Box 190 Bryan, Ohio 43506
CONTACT (NAME/TITLE/PHONE) Ric Homier / Superintendent/ 419-636-8741

FACILITY EVALUATION													
(S = Satisfactory, M = Marginal, U = Unsatisfactory)													
<table border="1"> <tr> <td>S</td> <td>Pretreatment</td> </tr> <tr> <td>S</td> <td>Site/Facility Review</td> </tr> <tr> <td></td> <td></td> </tr> </table>	S	Pretreatment	S	Site/Facility Review			<table border="1"> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table>						
S	Pretreatment												
S	Site/Facility Review												
* See inspection letter													

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
Jason Ko 	Ohio EPA/NWDO	10/6/11
Signature of Reviewer 	Ohio EPA/NWDO	10/4/11
Elizabeth A. Wick, P.E.		



POTW PRETREATMENT COMPLIANCE CHECKLIST

PCI CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation
 Section II Supplemental Data Review/Interview
 Section III Evaluation and Summary (Optional)

Attachment A Pre-Inspection Checklist

Attachment B Pretreatment Program Profile

Attachment C Worksheets

WENDB/ RNC Worksheet

IU Site Visit Report Form (Optional)

File Review Worksheets (Optional)

Attachment D Supporting Documentation

Control Authority (CA) name and address	Date(s) of PCI
<i>City Of Bryan P O Box 190 Bryan, Ohio 43506</i>	9/27/2011

INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number
Jason Ko	Environmental Specialist/ Ohio EPA/NWDO	419-373-3021

CA REPRESENTATIVE(S)		
Name	Title/Affiliation	Telephone Number
Ric Homier	<i>Superintendent/ City of Bryan</i>	419-636-8741



ACRONYM LIST

Acronym	Term
AO	Administrative Order
BMP	Best Management Practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Waste stream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally Different Factors
FTE	Full-Time Equivalent
FWA	Flow-Weighted Average
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not Applicable
ND	Not Determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total Toxic Organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base



INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE 1 Industry name and address

Titan Tire
 927 South Union Street
 Bryan, Ohio 43506

Type of industry
 Tire Manufacturing

IU CLASSIFICATION BY CA:

Categorical SIU
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd)	Average process flow (gpd)
160,000	160,000

Industry visited during PCI? Yes No

COMPLIANCE STATUS

SNC (period: _____) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION:

Comments
 SIC 3011
 Control Mechanism expires 12/31/2012
 CA cited Pretreatment Non-compliances on 10/9/2009 and 6/17/2010

FILE ____ Industry name and address

Type of industry

IU CLASSIFICATION BY CA:

Categorical SIU -
 Category(ies)
 Non-categorical SIU Non SIU

Average total flow (gpd)	Average process flow (gpd)
--------------------------	----------------------------

Industry visited during PCI? Yes No

COMPLIANCE STATUS

SNC (period: _____) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION:

Comments

IU IDENTIFICATION (Continued)







General Comments

- * All IDP's are currently effective.
- * IU inspections are done annually



SECTION I: IU FILE EVALUATION

Industry Name					INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Use NA (not available) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Use an "x" in the space when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.	
Bricker plating						
File <i>1</i>	File <i>2</i>	File	File	File	IU FILE REVIEW	Reg. Cite
					A. CA NOTIFICATION OF IU	
X					1. Notified of classification (new IU) or change in classification (existing IU)	403.8(f)(2)(iii)
					* BMR/90-day report submitted (for new IU)	403.12(b)&(d)
X					2. Notified of applicable RCRA standards	403.8(f)(2)(iii)
Comments						



SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
X					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
X					a. Statement of duration (<5 years)	
X					b. Statement of nontransferability w/o prior notification	
X					c. Listing of applicable effluent limits (local, categorical standards)	
X					d. Selfmonitoring requirements	
X					i. Identification of pollutants to be monitored	
X					ii. Sampling frequency	
X					iii. Sampling at locations/discharge points adequately defined	
X					iv. Appropriate sample types (grab or composite)	
X					v. Reporting requirements	
X					vi. Record-keeping requirements (3 years minimum)	
X					e. Statement of applicable civil and criminal penalties	
NA					f. Compliance schedules	
X					g. Requirement to notify CA of slug loadings	
X					h. Requirement to notify CA of spills, bypasses, upsets, etc.	
X					i. Requirement to notify CA of significant change in discharge	
X					j. 24-hour notification of violation/resample requirement	

Comments:



SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
C. CA APPLICATION OF IU PRETREATMENT STANDARDS						
X					1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
X					a. Proper classification by category/subcategory	
X					b. Proper classification as new/existing source	
X					c. Proper application of limits for all regulated pollutants	
X					d. Proper calculation and application of production-based standards	403.6(c)
NA					e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
X					3. Application of local limits	
X					4. Application of most stringent limits	403.8(f)(1)(ii)

Comments:



SECTION I: IU FILE EVALUATION (Continued)

File I	File	File	File	File	IU FILE REVIEW	Reg. Cite
D. CA COMPLIANCE MONITORING						
					Sampling	403.8(f)(1)(iii)(D)
X					1. Sampled at frequency specified in approved	
X					2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
X					3. Sampled all parameters for which local or categorical limits applied	
X					4. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	403.8(f)(2)(v)
X					1. Inspected at frequency specified in approved program	
X					2. Documentation of inspection activities	403.8(f)(2)(vi)
X					3. Evaluated need for slug discharge control plan at least every two years	403.8(f)(2)(v)

Comments:

CA sampling is conducted 2/yr

CA inspection is conducted 1/yr



SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
E. CA ENFORCEMENT ACTIVITIES						
					1. Response to violations	403.8(f)(2)(vi)
X					a. Discharge violations	
X					b. Monitoring/reporting violations	
NA					c. Compliance schedule violations	
					2. Proper calculation of SNC	403.8(f)(2)(vii)
X					a. Chronic	
X					b. TRC	
X					c. Pass-through/interference caused by spill or slug discharge	
X					d. Reporting requirements	
X					3. Publication for SNC	403.8(f)(2)(vii)
X					4. Adherence to approved ERP	403.8(f)(5)
X					a. Proper response to violations	
NA					b. Escalation of enforcement	

Comments:



SECTION I: IU FILE EVALUATION (Continued)

File I	File	File	File	File	IU FILE REVIEW	Reg. Cite
F. SELF-MONITORING AND REPORTING						
X					1. Sampled at frequency specified in control mechanism/regulation	403.12(e)&(h)
X					2. TTO Requirements met	
X					a. TOMP submitted and updated (if applicable)	
X					b. TTO sample results or certification statement submitted as required	
X					3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
X					4. Reported for all required pollutants	403.12(g)(1)&(h)
X					5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
NA					6. Met compliance schedule milestones by required dates	403.12(c)
X					7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
X					8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
X					9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
NA					10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
X					11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:

- IU elects to do TTO monitoring
- Perform Quarterly Samplings prior to 3/31, 6/30, 9/30 & 12/31
- Perform Annual Sampling during the first half of the year



SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments:

SECTION I COMPLETED BY:	Jason Ko	DATE:	9/27/2011
TITLE:	ES II	TELEPHONE:	419-373-3021



SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. Have you made any changes to the approved program since the last inspection? (Local limits, ERP, SUO, control mechanisms, SIU list, etc.)	Yes	No
		X

If yes, discuss.

2. Have you identified any needed changes?

If yes, describe.

Update City Sewer Ordinance

	Yes	No
	X	

B. IU CHARACTERIZATION [403.8(f)(2)(i)&(iii)]

1. How do you identify and characterize new IUs?
(is IWS used?)

Notifications from the City Chamber of Commerce, City Engineering Dept, local news media, & routine surveys/ inspections

2. How and when do you identify changes in wastewater discharges at existing IUs
(especially to determine if they need to be classified as a SIUs)

During semi-annual sampling events and/or annual inspections conducted by the City



SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENB~NOCM][RNC~I] 0 %

If any, explain.

All 3 IUs are covered by permits

2. a. How many control mechanisms were allowed to expire prior to reissuance? 0

If any explain.

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC~II] 0

If any, explain.

c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?

Yes	No
X	



SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS [403.8(f)(1)(iii)]

1. a. How and when do you evaluate SIUs for the need to develop slug control discharge plans?
(check on CA's definition of slug discharge)

If any, explain.

During routine annual inspections & semi-annual reports

b. How many SIUs were evaluated in the past two years?

3

2. a. Describe any wastes hauled to the POTW.
None

b. If any IUs have their wastewater hauled to the POTW, how do you ensure all applicable standards (local and categorical) are met?

None

c. List IUs that haul their wastewater to the POTW.

No

E. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were the following: [403.8(f)(2)(v)][WENDB-NOIN][RNC II]
(Define the 12 month period _____ to _____.)

a. Not sampled or not inspected at least once [WENB-NOIN]

0	%
---	---

b. Not sampled at least once

0	%
---	---

c. Not inspected at least once (all parameters)?

0	%
---	---

If any, explain.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB-SNIN]

0

If any, explain.





SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT (continued)		
3. Were you made aware of any hazardous waste discharges to the POTW? [403.12 (j)&(p)]	Yes	No
		X
G. GENERAL OBSERVATIONS/INFORMATION ENFORCEMENT		
Have you had any problems (general or specific) implementing your approved program?	Yes	No
		X
Additional Comments/Observations/Information:		

SECTION I COMPLETED BY: Jason Ko	DATE: 9/27/2011
TITLE: ES II	TELEPHONE: 419-373-3021



SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> • Status of program modifications (Ref. 403.18 /Checklist II.A.1) <p>None</p>	<input type="checkbox"/>	<input type="checkbox"/>
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> • Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>



C. IU CHARACTERIZATION

- Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)

X

D. CONTROL MECHANISM

- Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1)

X

All SIU's are under IDP's

Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)

X

Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/Checklist II.D.3&4)

None



Description	Recommended Action	Required Action
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&(iii); 403.5 /Checklist I.A) 		X
<ul style="list-style-type: none"> Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3) 		X
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1) <p>CA Monitoring 2/yr; CA Inspection 1/yr</p>		X
<ul style="list-style-type: none"> Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) 		X



Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4) 		X
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) 		X
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)		X
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans (Ref. 403.8(f)(2)(v)/Checklist I.B.2.d; II.F.8) 		X



Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b) 		X
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.1.1) 		X
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)		X



Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) 		X
<ul style="list-style-type: none"> Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&5;II.G.2.c&d, 5&6) 		X
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H) 		X



Description	Recommended Action	Required Action
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources (Ref. 403.8(f)(3)/Checklist II.I) 		X
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources (Checklist II.J.1&2) 		X



Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness (Checklist II.J.1) 		X
<ul style="list-style-type: none"> Integration of pollution prevention (Checklist II.J.3,4&5) <p>Will explore more ways to integrate pollution prevention into the pretreatment program</p>	X	
K. ADDITIONAL EVALUATIONS/INFORMATION		



Description	Recommended Action	Required Action

SECTION III COMPLETED BY:	Jason Ko	DATE:	9/27/2011
TITLE:	ES II	TELEPHONE:	419-373-3021



2
4

WENDB AND RNC WORKSHEET

FACILITY INFORMATION				
Name City of Bryan WWTP	Date of Inspection 9/27/2011			
OH Number OH0020532	NPDES Number 2PD00018			
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	<i>13</i>	Annual	Annual	SIUS
Number of CIUs	<i>2</i>	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	<i>0</i>	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	<i>0</i>	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	<i>0</i>			PSNC
Number of SIUs in SNC with self-monitoring	<i>0</i>			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	<i>0</i>	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	<i>-</i>			
Technical Evaluation of Local Limits (Y/N) (Audit)	<i>-</i>			
Adoption of technically-based limits (Y/N) (Audit)	<i>-</i>			

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
- Failure to enforce against pass through and/or interference	<input type="checkbox"/>	I		
- Failure to submit required reports within 30 days	<input type="checkbox"/>	I		
- Failure to meet compliance schedule milestone date within 90 days	<input type="checkbox"/>	I		
- Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	<input type="checkbox"/>	II	II.C.2.b	II.D.1.b
- Failure to inspect or sample 80% of SIUs within the last 12 months	<input type="checkbox"/>	II	II.E.1	II.F.1
- Failure to enforce pretreatment standards and reporting requirements	<input type="checkbox"/>	II		I.C.1
- Other (specify)	<input type="checkbox"/>	II		
SNC				
- 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	<input type="checkbox"/>			

