



State of Ohio Environmental Protection Agency  
Southwest District

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Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

September 21, 2007

Mayor and Council  
City of Harrison  
300 George Street  
Harrison, Ohio 45030

**Re: Harrison -- PCI -- 2007 -- NOTICE OF VIOLATION**

Ladies and Gentlemen:

On August 22, 2007, I conducted a pretreatment compliance inspection (PCI) of the City of Harrison's approved pretreatment program. The program was represented by Gene Allen and Jim Leslie. The PCI followed a checklist developed by Ohio EPA to evaluate all major aspects of the City's approved program. A discussion of the required and recommended actions is given below. In addition to the file review, a walk through of the wastewater treatment plant was also taken.

As noted, in detail, in last year's inspection report, Oil and Grease continues to be a problem at the Publicly Owned Treatment Works (POTW). During the plant walk-through, white grease balls were noted throughout the treatment plant, and there was a build-up of grease in the wet well of the plant. It appears there could be pass-through of the grease to the Whitewater River.

In December 2005, JTM Food Group began cooking its meat products on-site. From January 1, 2006 through August 31, 2007, the wastewater treatment plant has had the following NPDES permit violations:

- February 2006 – Two Total Suspended Solids violations – 1 weekly & 1 monthly;
- July 2006 – One Daily Oil & Grease violation;
- August 2006 – One Weekly Ammonia violation;
- May 2007 – One Weekly Ammonia violation;
- June 2007 – Two Total Suspended Solids violations – 1 weekly & 1 monthly; and
- July 2007 – One Weekly Ammonia violation.

In the two year period of January 1, 2004 through December 31, 2005, the POTW had two weekly ammonia violations in January 2004. This is a new wastewater plant with a design flow of 2.75 million gallons per day. The actual flow to the plant is 1.1 million gallons per day. The facility should be in compliance with its permit limitations. It appears that something is impacting the plant, and this corresponds with the changes at the JTM Food Group. Please note, that under the definition of interference, JTM Food Group does not



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have to be the sole cause of the interference. The rules states a facility can discharge alone or in conjunction with other discharges to cause interference.

As part of last year's inspection, JTM was required to submit a slugload discharge control plan. This plan was to address the slugs of grease that were coming to the POTW, and return the facility to compliance. The plan that was submitted is inadequate. The violations are still occurring. In addition, the plan stated that the grease interceptors would be used as the slugload control plan. This is not acceptable. The purpose of the plan is to prevent the material from reaching the drain in the first place. Using a tank in the line as the only way to capture slugs is contrary to a slugload discharge control plan. During the past year, the grease has clogged up the tubing in the City's sampler, and blocked a manhole backing flow up into JTM's line. A copy of guidance regarding slugload discharge control plans can be found at <http://www.epa.gov/npdes/pubs/owm021.pdf>. Additionally, the sampling at the facility has shown consistent non-compliance with Oil & Grease. A number of these violations did not have any enforcement action taken.

This situation can not be allowed to continue. Enforcement must be taken for each and every violation at the facility. Enforcement must be taken for each of the violations that occurred during the past year that did not have an action taken. Enforcement needs to be escalated to return the facility to compliance. This would, at a minimum, include placing the facility on a compliance schedule and fines and/or penalties. To date, only Notices of Violation (NOVs) have been sent. If the City is unable to return JTM to compliance within six months, the Ohio EPA will have no other recourse than to refer both the City and JTM Food Group for enforcement action. This letter will serve as the Notice of Violation for the Reportable Non-Compliance for failure to enforce the pretreatment program. Please note that failure to enforce against pass-through and/or interference will put the program into Significant Non-Compliance.

### **REQUIRED ACTIONS**

1. JTM Food Group
  - a. JTM must submit an adequate slugload discharge control. The plan should result in compliance with the facility's discharge permit. This plan must be submitted to the City and this office by November 2, 2007.
  - b. Enforcement must be taken for all violations at the facility. This must be completed by October 19, 2007. In addition, significant non-compliance (SNC) calculations must also be completed on these violations to determine if the facility is in SNC for violation. If the facility is in SNC, then they must be published within two weeks of the determination. A copy of this publication must be provided to this office.
  - c. Enforcement must be escalated against JTM until they are returned to compliance. The enforcement should be consistent with the City's

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enforcement response plan (ERP) and could include, but is not limited to, compliance schedules and fines. The facility must be returned to compliance within six (6) months from the date of this report.

### **RECOMMENDED ACTIONS**

1. JTM Food Group

JTM Food Group should install treatment for oil and grease removal to reduce the amount that is being discharged, and assist the facility returning to compliance.

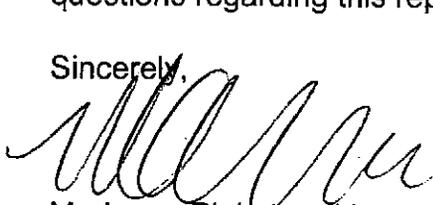
2. 40 CFR 403 Streamlining Provisions

The City should consider incorporating the required changes from the Streamlining Provisions of 40 CFR 403 into its ordinance.

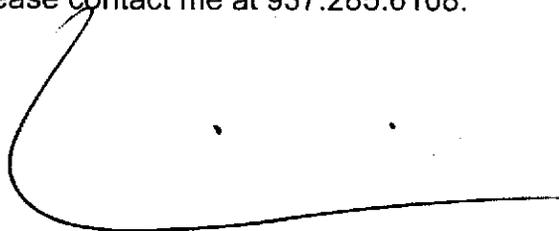
Please notify this office, in writing, by October 12, 2007 of your intentions to implement the above within six (6) months of the date of this report. Also, please provide a progress report by January 25, 2008 (five months from the report date) describing the status of each of the required actions. Failure to resolve the noted required actions within six months will result in enforcement against the City for failure to enforce its pretreatment program.

The assistance provided by your staff was appreciated. Should you have any additional questions regarding this report, please contact me at 937.285.6108.

Sincerely,



Marianne Piekutowski  
District Pretreatment Coordinator  
Division of Surface Water



Enclosures

Cc: Gene Allen, Harrison  
Jim Leslie, Harrison  
Joe Maas, JTM Food Group, w/o enclosures  
Steve Orenchuk, DSW/CO



State of Ohio Environmental Protection Agency  
Southwest District Office

Pretreatment Compliance Inspection Report

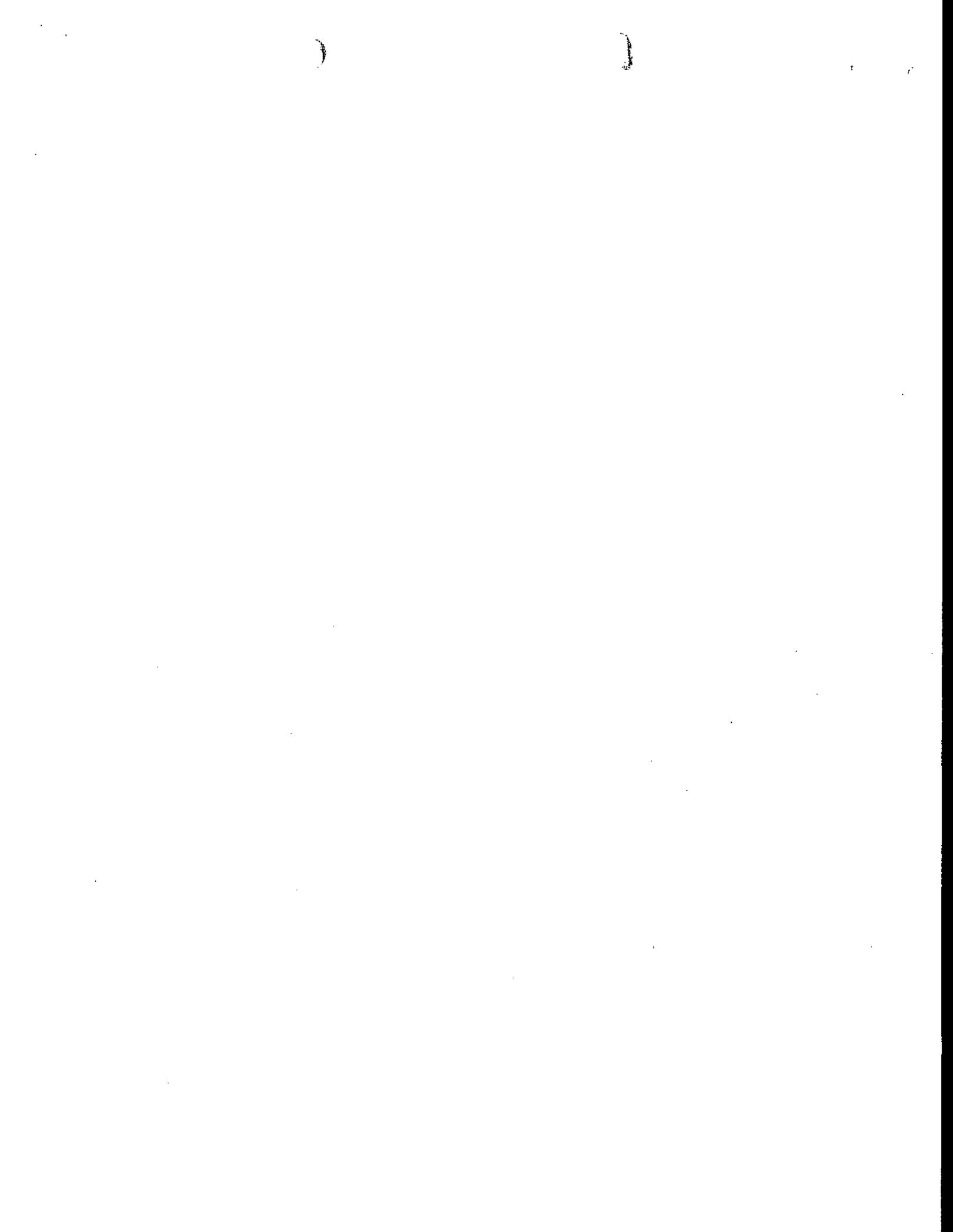
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0021440	1PC00002*HD	08/22/2007	P	S	1

Section B: Facility Data	
<b>Name and Location of Facility Inspected</b>	<b>Entry Time</b>
City of Harrison WWTP 10999 Campbell Road Harrison, Ohio 45030	9:30 am
	<b>Exit Time</b>
	2:00 pm
<b>Name(s) and Title(s) of On-Site Representatives</b>	<b>Phone Number(s)</b>
Gene Allen, Pretreatment Technician	513.367.3725
<b>Responsible Official(s)</b>	<b>Coordinator's Mailing Address</b>
Mayor and Council City of Harrison 300 George Street Harrison, Ohio 45030	City of Harrison WWTP 10999 Campbell Road Harrison, Ohio 45030

Section C: Areas Evaluated During Inspection	
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)	
Pretreatment	

Section D: Summary of Findings (Attach additional sheets if necessary)
See Attached Report.

Inspector	Reviewer
9/21/07	9/24/07
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



# POTW PRETREATMENT COMPLIANCE CHECKLIST

## PCI CHECKLIST CONTENTS

Cover Page and Acronym List	
Section I	IU File
Section II	Supplemental Public Hearing Interview
Section III	Evaluation and Summary (Optional)
<input checked="" type="checkbox"/> Attachment A	Pre-Inspection Checklist
<input checked="" type="checkbox"/> Attachment B	Pretreatment Program Profile
Attachment C	Worksheets
	<input checked="" type="checkbox"/> WFNDB RNC Worksheet
	IU Site Report Form (Optional)
	<input checked="" type="checkbox"/> File Review Worksheets (Optional)
Attachment D	Supporting Documentation SNC Publication

Control Authority (CA) name and address		Date(s) of PCI
<i>Mayor and Council City of Harrison 300 George Street Harrison, Ohio 45030</i>		<i>August 22, 2007</i>
<b>INSPECTOR(S)</b>		
Name	Title/Affiliation	Telephone Number
<i>Mari Piekutowski</i>	<i>Environmental Specialist 2/Ohio EPA Southwest District</i>	<i>937.285.6108</i>
<b>CA REPRESENTATIVE(S)</b>		
Name	Title/Affiliation	Telephone Number
<i>Gene Allen</i>	<i>Pretreatment Technician/City of Harrison</i>	<i>513.367.3725</i>

Acronyms	Terms
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 Wastestream 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

*Premiere Ink Systems, Inc.  
10420 North State Street  
Harrison, Ohio 45030*

Type of industry

*Formulation & manufacturing of water-based inks and coatings for the flexographing and gravure printing industries.*

IU CLASSIFICATION BY CA:

Categorical SIU - 40 CFR \_\_\_\_\_, \_\_\_\_\_

Category(ies) \_\_\_\_\_

Non-categorical SIU

Non SIU

Average total flow (gpd)

*10,000*

Average process flow (gpd)

Industry visited during PCI?

Yes

No

### COMPLIANCE STATUS

SNC (period: \_\_\_\_\_)  Noncompliance/corrected  Noncompliance/continuing  In compliance

EXPLANATION:

Comments

FILE 2 Industry name and address

*JTM Food Group  
200 Sales Avenue  
Harrison, Ohio 45030*

Type of industry

*Manufacture meat products and bakery buns.*

IU CLASSIFICATION BY CA:

Categorical SIU - 40 CFR \_\_\_\_\_, \_\_\_\_\_

Category(ies) \_\_\_\_\_

Non-categorical SIU

Non SIU

Average total flow (gpd)

*30,000*

Average process flow (gpd)

Industry visited during PCI?

Yes

No

### COMPLIANCE STATUS

SNC (period: 6/1/06-5/31/07)  Noncompliance/corrected  Noncompliance/continuing  In compliance

EXPLANATION:

Comments

*Slugloading and Oil & Grease issues. The Slugload Plan is inadequate because there are on-going violations.*



**IU IDENTIFICATION (Continued)**

FILE ____ Industry name and address	Type of industry	
IU CLASSIFICATION BY CA: <input type="checkbox"/> Categorical SIU - 40 CFR _____, _____, Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during PCI    Yes <input type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS		
<input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance		
EXPLANATION:		
Comments		

FILE ____ Industry name and address	Type of industry	
IU CLASSIFICATION BY CA: <input type="checkbox"/> Categorical SIU - 40 CFR _____, _____, Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during PCI?    Yes <input type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS		
<input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance		
EXPLANATION:		
Comments		

General Comments

## 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.
Premier Ink Systems, Inc	JTM Food Group				
File 1	File 2	File	File	File	Reg. Cite
<b>IU FILE REVIEW</b>					
<b>A. CA NOTIFICATION OF IU</b>					
NA	NA				1. Notified of classification (new IU) or change in classification of IU) 403.8(f)(2)(iii)
NA	NA				BMP 90-day report submitted (on new I 403.8(f)(2)(b)&(d)
NA	NA				2. Notified of applicable RCRA standards 403.8(f)(2)(iii)
Comments					

## SECTION I: IU FILE EVALUATION (Continued)

File 1	File 2	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>B: ISSUANCE OF IU CONTROL MECHANISM</b>	
Y	Y				1. Issuance or reissuance of control mechanism	403:8(1)(a)
					2. Control mechanism contents	403:8(1)(b)
Y	Y				a. Statement of duration (<5 years)	
Y	Y				b. Statement of non-transferability w/o prior notification	
Y	Y				c. Listing of applicable effluent limits (local, categorical standards)	
					d. Self-monitoring requirements	
NAI	NAI				i. Identification of pollutants to be monitored	
NAI	NAI				ii. Sampling frequency	
NAI	NAI				iii. Sampling at locations/discharge points adequately defined	
NAI	NAI				iv. Appropriate sample types (grab or composite)	
NAI	NAI				v. Reporting requirements	
Y	Y				vi. Record-keeping requirements (3 years minimum)	
Y	Y				e. Statement of applicable civil and criminal penalties	
NAI	NAI				f. Compliance schedules	
Y	Y				g. Requirement to notify CA of slug loadings	
Y	Y				h. Requirement to notify CA of spills, bypasses, etc.	
Y	Y				i. Requirement to notify CA of significant change in discharge	
Y	Y				j. 24-hour notification of violation/resample requirement	

Comments:

1 - The City does the self-monitoring for its industries.

## SECTION I: IU FILE EVALUATION (Continued)

File 1	File 2	File	File	File	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>3. CA APPLICATION OF IU PRE-TREATMENT STANDARDS</b>	
Y	Y				1. Proper categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(i)
					2. Proper calculation and application of categorical standards	403.8(f)(1)(ii)
NA	NA				3. Proper classification by category/subcategory	
NA	NA				4. Proper classification as new/existing source	
NA	NA				5. Proper application of limits for all regulated pollutant	
NA	NA				6. Proper calculation and application of production based limits	403.6(e)
NA	NA				7. Proper calculation and application of CWF or PWA	403.6(d)&(e)
Y	Y				8. Application of local limits	
Y	Y				<b>4. Application of most stringent limits</b>	<b>403.8(f)(1)(ii)</b>

Comments:

**SECTION I: IU FILE EVALUATION (Continued)**

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

Comments:

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

*1 - There are on-going oil and grease issues with JTM. Notices of violation were issued for some of the oil and grease violations, but not all of them. At the inspection, clarification was provided to the City that any sample tested in accordance with a approved methods and shows a violation requires enforcement. The slugload plan submitted by the facility is inadequate. The use of a grease interceptor as a slugload prevention method is unacceptable. This must be revised to prevent the oil and grease from reaching the drains and sewers. The continuing violations also indicate the plan is inadequate.*

**SECTION I: IU FILE EVALUATION (Continued)**

File 1	File 2	File	File	File	IU FILE REVIEW	Reg. Cite
<b>F. SELF-MONITORING AND REPORTING</b>						
NAI	NAI				1. Sampled at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. TIO Requirements met	
NA	NA				a. TOMP submitted and updated (if applicable)	
NA	NA				b. TIO sample results or certification statement submitted as required	
NAI	NAI				3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
NAI	NAI				4. Reported for all required pollutants	403.12(g)(ii)&(h)
NAI	NAI				5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
NA	NA				6. Met compliance schedule milestones by required dates	403.12(c)
NA	N				7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
NAI	NAI				8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
NAI	NAI				9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
NA	N2				10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
NA	NA				11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:

1 - The City does the self-monitoring for its industries.

2 - The slugload plan submitted by JTM is inadequate. There are on-going violations.

**SECTION I: IU FILE EVALUATION (Continued)**

File 1	File 2	File	File	File	IU FILE REVIEW					Reg. Cite
					G. OTHER					

Comments:

SECTION I COMPLETED BY: <i>Mari Piekutowski</i>	DATE: <i>August 22, 2007</i>
TITLE: <i>Environmental Specialist 2</i>	TELEPHONE: <i>937.285.6108</i>

## 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

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
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If yes, discuss.

*Harrison Ironworks is no longer in business. There was no permit issued in 2007. The facility is still being monitored by the City. No discharge has been seen in months. The facility has been dropped from the approved program. The City has purchased an ISCO 6712 sampler. It will be used for monitoring sanitary mains throughout the City for local limits evaluation. The sampler will also be used for industrial monitoring.*

2. Have you identified any needed changes?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If yes, describe.

*There is a possibility of raising surcharge limits on Oil & Grease and BOD. There is also the possibility of setting surcharge limits on the FOG program. The problem associated with this is being able to obtain a representative sample at the grease trap discharge.*

### B. IU CHARACTERIZATION 403.8(b)(2)(i) & (ii)

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

*The City uses an industrial waste survey (IWS). When a new industry would look at coming into the City, an IWS is sent out, and records are checked in past locations. Also check on new industries through the Building, Zoning and Planning Department.*

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)

*Through sampling, inspections, water usage, word of mouth, and the notification requirement in the facility's permits.*

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW**

**C. CONTROL MECHANISM EVALUATION**

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

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] 1  
 If any, explain.

*Harrison Ironworks was not issued a permit because they are no longer in business. The City has been monitoring the discharge. There has been no discharge from the facility in several months. The facility is now for sale. A pretreatment program modification request was sent in August 13, 2007 to delist the facility.*

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

Yes	No
X	

*A survey is completed before permit issuance.*

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW**

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

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 the facility inspection and sampling, water usage, word of mouth and spills.*

*JTM Provisions was required to develop a slugload control plan. The plan was completed on March 13, 2007.*

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

*All*

2. a. Describe any wastes hauled to the POTW.

*No hauled wastes are accepted.*

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

*NA*

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

*None.*

**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 June 2006 to May 2007.)

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

0	0%
---	----

b. Not sampled at least once (all parameters)

0	0%
---	----

c. Not inspected at least once

0	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

### ENFORCEMENT

1. Which of the following enforcement actions did you use during the past year?

- a. Notice or letter of violation
- b. Administrative Order
- c. Administrative fine
- d. Show cause hearing
- e. Compliance schedule
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of service
- j. Other (specify)

Yes	No
<b>X</b>	
	<b>X</b>

Explain if appropriate:

2. Did the treatment plant experience any following during the past year?

- a. Interference
- b. Pass through
- c. Fire or explosions (flashpoint, etc.)
- d. Corrosive structural damage
- e. Flow obstructions
- f. Excessive flow rates
- g. Excessive pollutant concentrations
- h. Heat problems
- i. Interference due to O & G
- j. Toxic fumes
- k. Illicit dumping of hauled wastes
- l. Worker health and safety concerns
- m. Other (specify)

Yes	No	Explain
?		<i>Appear to be impacts from JTM O&amp;G.</i>
	<b>X</b>	
<b>X</b>		<b>O&amp;G – 7/24/06; NH3 – 5/11/07</b>
	<b>X</b>	
<b>X</b>		<i>Appear to be impacts from JTM O&amp;G</i>
	<b>X</b>	
	<b>X</b>	
	<b>X</b>	

If yes, how did you respond?

**Oil & Grease – Monitored IUs, and are continuing to monitor industrial discharge.**

**NH3 – Monitored IUs. Continue to monitor IUs. Monitor NH3 at the WWTP. Monitor WWTP discharge, supernate and press effluent at the WWTP.**

**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: *Gene Allen*

DATE: *August 22, 2007*

TITLE: *Pretreatment Technician*

TELEPHONE: *513.367.3725*

### SECTION III: EVALUATION AND SUMMARY

**INSTRUCTIONS:** Based on information and data evaluated, summarize the findings of the audit for each program element shown below. Identify all problems or deficiencies based on the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Recommended Action	Required Action
<b>A. CAP RETREATMENT PROGRAM MODIFICATION.</b>		
<ul style="list-style-type: none"> <li>Status of program modifications (Ref. 403.18 /Checklist II.A.1)</li> </ul>		
<b>B. LEGAL AUTHORITY</b>		
<ul style="list-style-type: none"> <li>Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)</li> </ul>	X	
<p><b><u>RECOMMENDED ACTION:</u></b> <i>The City should consider incorporating the required provisions of the streamlining rules into its SUO.</i></p>		
<ul style="list-style-type: none"> <li>Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)</li> </ul>		

## SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<b>C. TOUCH AND FEEL VALUE</b>		
<ul style="list-style-type: none"> <li>• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)</li> </ul>		
<b>D. CONTROL MECHANISM</b>		
<ul style="list-style-type: none"> <li>• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1)</li> </ul>		
<p>Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)</p>		

### SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&4)		
<b>E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>		
<ul style="list-style-type: none"> <li>• Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&amp;(iii); 403.5 /Checklist I.A)</li> </ul>		
<ul style="list-style-type: none"> <li>• Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&amp;3)</li> </ul>		
<b>F. COMPLIANCE MONITORING</b>		
<ul style="list-style-type: none"> <li>• Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&amp;(v)/Checklist I.B.1&amp;2, II.F.1)</li> </ul>		

### SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Adequate inspections (Ref. 403.8(f)(2)(v)&amp;(vi)/Checklist I.B.1; II.F.1)</li> </ul>		
<ul style="list-style-type: none"> <li>Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&amp;4)</li> </ul>		
<ul style="list-style-type: none"> <li>Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F)</li> </ul>		
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)		

**SECTION III: EVALUATION AND SUMMARY**

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>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)</li> </ul> <p><b><i>REQUIRED ACTION: The City must obtain an effective slug discharge control plan from JTM. The current plan is not satisfactory since there are on-going violations.</i></b></p>		X
<ul style="list-style-type: none"> <li>Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&amp;(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b)</li> </ul>		
<b>G. ENFORCEMENT</b>		
<ul style="list-style-type: none"> <li>Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1)</li> </ul>		

**SECTION III: EVALUATION AND SUMMARY**

Description	Recommended Action	Required Action
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)		
<ul style="list-style-type: none"> <li>Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4)</li> </ul>		
<ul style="list-style-type: none"> <li>Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&amp;5;II.G.2.c&amp;d, 5&amp;6)</li> </ul>		X
<p><b><i>REQUIRED ACTION:</i></b> The City must take enforcement for every violation. There were a large number of violations for Oil &amp; Grease without any enforcement for JTM.</p>		
<p><b><i>REQUIRED ACTION:</i></b> The City must take effective enforcement action against JTM until they return to compliance. Enforcement must be escalated until the facility is in continuous compliance.</p>		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<p>HA 1.1 MANAGEMENT/PUBLIC PARTICIPATION</p> <ul style="list-style-type: none"><li>Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H)</li></ul>		
<p>RESOURCES</p> <ul style="list-style-type: none"><li>Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)</li></ul>		

### SECTION III: EVALUATION AND SUMMARY

Description:	Recommended Action	Required Action
<b>J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION</b>		
<ul style="list-style-type: none"> <li>• Understanding of pollutants from all sources (Checklist II.J.1&amp;2)</li> </ul>		
<ul style="list-style-type: none"> <li>• Documentation of environmental improvements/effectiveness (Checklist II.J.1)</li> </ul>		
<ul style="list-style-type: none"> <li>• Integration of pollution prevention (Checklist II.J.3,4&amp;5)</li> </ul>		

**SECTION III: EVALUATION AND SUMMARY**

Description	Recommended Action	Required Action
K. ADDITIONAL INFORMATION/REMARKS		

***RECOMMENDED ACTION: The City should consider having JTM install adequate oil and grease treatment equipment.***

SECTION III COMPLETED BY:	<i>Mari Piekutowski</i>	DATE:	<i>September 13, 2007</i>
TITLE:	<i>Environmental Specialist 2</i>	TELEPHONE:	<i>937.285.6108</i>

**ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE**

**Pretreatment Pre-Inspection Checklist  
PCI/Audit/RI**

**POTW:** *City of Harrison*

**Date of Inspection:** *August 22, 2007*

**Type of Inspection:** *PCI / ~~Audit~~ / ~~RI~~*

**Inspector:** *Mari Piekutowski*

This checklist must be completed prior to conducting a PCI, audit, or RI. This checklist is designed to coordinate information from a number of sources to provide background information and to help develop an overview of the pretreatment program. Summarize items that should be verified during inspection. If items are get too numerous or get too lengthy to summarize, copy appropriate pages and attach.

**Program Deficiencies**

Pretreatment related Consent Decree and/or Administrative Orders that were completed or are pending since the last inspection.	<i>None.</i>
NPDES permit compliance schedule items that have been completed or are pending.	<i>None.</i>
Since the last inspection, has the CA been in RNC or SNC? Why?	<i>No.</i>
Findings of the last PCI/Audit/RI. Highlight any unresolved issues or corrective actions taken by the CA.	<i>JTM – Slugload discharge and Oil &amp; Grease violations.</i>

## Control Authority Submittals and Reports

Have there been any program modifications since the last inspection? If yes, what is the status?	<i>Yes. Harrison Ironworks has been delisted. The modification was approved.</i>
Was the Annual Report submitted on time? Is it complete?	<i>Yes.</i>
Comments/follow-up questions on the Annual Report	<i>None.</i>
Were the Quarterly Reports submitted on time? Are they complete?	<i>Yes.</i>
Comments/follow-up questions on the Quarterly Industrial User Violation Reports	<i>Status of JTM compliance. Status of Torbeck with bankruptcy.</i>
Identify industries to target for file reviews/inspections, based on the Annual and Quarterly Reports	<i>JTM – Inadequate slug discharge plan and compliance with Oil &amp; Grease.</i>

## MOR Data Review

Effluent violations to discuss.	<i>February 2006 – TSS; July 2006 - Oil &amp; Grease; August 2006 - Ammonia; May 2007 – Ammonia; June 2007 – TSS; July 2007 - Ammonia</i>
Sludge quality issues to discuss.	<i>None.</i>

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

### A. CA INFORMATION

1. CA name *City of Harrison WWTP*
2. Original pretreatment program submission approval date *March 15, 1985*
3. Required frequency of reporting to Approval Authority *Quarterly*
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
<i>Harrison WWTP</i>	<i>OH0021440;IPC00002*HD</i>	<i>11/01/2003</i>	<i>10/31/2008</i>

5. Does the CA have a sludge management plan on file with Ohio EPA?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If yes, provide the following information.

POB Name	Date of Plan Approval

### B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM] *May 12, 1986*

2. Identify any substantial modifications the CA made in its pretreatment program in the last five years. [403.18]

Date Approved	Name of Modification
<i>October 1, 2001</i>	<i>Delete Aero Propulsion</i>
<i>July 2, 2004</i>	<i>Technical Evaluation of Local Limits/Definition of Minor Users</i>
<i>June 8, 2004</i>	<i>Modified IU Permits</i>
<i>July 14, 2005</i>	<i>Huissman Status Change</i>
<i>May 25, 2006</i>	<i>Harrison Ironworks Status Change</i>
<i>August 13, 2007</i>	<i>Delete Harrison Ironworks</i>

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

TREATMENT PLANT INFORMATION					
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.					
1. Treatment plant name <i>City of Harrison WWTP</i>			2. Location address <i>10999 Campbell Road, Harrison, Ohio 45030</i>		
3. a. NPDES permit number  <i>OH0021440;1PC00002*HD</i>		b. Expiration date  <i>October 31, 2008</i>	4. Treatment plant wastewater flows		
			Design	MGD	Actual
			<i>2.75</i>		<i>1.1</i>
5. Sewer System		a. Separate <i>100%</i>	b. Combined <i>0%</i>	c. Number of CSOs <i>0</i>	
6. a. Industrial contribution (MGD)		b. Number of SIUs discharging to plant		c. Percent industrial flow to plant	
<i>0.042</i>		<i>7</i>		<i>3.8%</i>	
7. Level of treatment			Type of Process(es)		
a. Primary	<input checked="" type="checkbox"/>	<i>Grit and Grease Removal</i>			
b. Secondary	<input checked="" type="checkbox"/>	<i>Extended Aeration/Oxidation Ditches, Secondary Clarifiers</i>			
c. Tertiary					
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.					
<i>*Note: Bioassay performed June 2006.</i>					
	Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)	Receiving Stream (Times/Year)	
a. Metals	<i>4-12</i>	<i>4-12</i>	<i>When hauled</i>	<i>4-12</i>	
b. Organics	<i>1</i>	<i>1</i>	<i>1</i>	<i>0</i>	
c. Toxicity testing	<i>0</i>	<i>1*</i>	<i>0</i>	<i>1*</i>	
d. EP toxicity					
e. TCLP					
9. Effluent Discharge					
a. Receiving water name  <i>Whitewater River</i>		b. Receiving water classification  <i>Exceptional Warmwater</i>		c. Receiving water use  <i>Industrial &amp; Agricultural Water Supply; Primary Contact</i>	
d. If effluent is discharged to any location other than the receiving water, indicate where.					
<i>NA</i>					

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

### C. TREATMENT PLANT INFORMATION (Continued)

11. Did the CA submit results of whole effluent biological toxicity testing as part of its NPDES permit application(s)? [122.21(j)(1) and (2)]	N/A	Yes	No
		<b>X</b>	
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]		<b>X</b>	
b. Has there been a pattern of toxicity demonstrated?			<b>X</b>

12. Indicate methods of sludge disposal.

Quantity of sludge		Quantity of sludge	
a. Land application	221.91	dry tons/year	e. Public distribution
			dry tons/year
b. Incineration		dry tons/year	f. Lagoon storage
			dry tons/year
c. Monofill		dry tons/year	g. Other (specify)
			dry tons/year
d. MSW landfill		dry tons/year	<i>June 2006 - 92.60; February 2007 - 129.31</i>

### D. LEGAL AUTHORITY

1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority).  
*City of Harrison Ordinances #13-91*

b. Date enacted/adopted *June 18, 1991*      c. Date of most recent revisions *June 30, 2004*

2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(i-vii)]

	Yes	No
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)]	<b>X</b>	
b. Require compliance with standards [403.8(f)(1)(ii)]	<b>X</b>	
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]	<b>X</b>	
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]	<b>X</b>	
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]	<b>X</b>	
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]	<b>X</b>	
g. Comply with confidentiality requirements [403.8(f)(1)(vii)]	<b>X</b>	

3. a. How many contributing jurisdictions are there?      *1*

List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.

Jurisdiction Name	Number of GIUs	Number of Other SIUs
<i>West Harrison, IN</i>	<i>0</i>	<i>0</i>

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

### D. LEGAL AUTHORITY (Continued)

3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

Yes	No
<input checked="" type="checkbox"/>	

If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).

*Written intergovernmental agreement between Harrison, Ohio and West Harrison, Indiana.*

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.

a. IWS update		e. Notification of IUs	
b. Permit issuance		f. Receipt and review of IU reports	
c. Inspection and sampling		g. Analysis of samples	
d. Enforcement		h. Other (specify)	

### E. IU CHARACTERIZATION

1. a. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(I)]

Yes	No
<input checked="" type="checkbox"/>	

b. Indicate which methods are to be used to update the IWS.

• Review of newspaper/phone book		• Onsite inspections	<input checked="" type="checkbox"/>
• Review of water billing records	<input checked="" type="checkbox"/>	• Permit application requirements	<input checked="" type="checkbox"/>
• Review of plumbing/building permits	<input checked="" type="checkbox"/>	• Citizens involvement	
		• Other (specify)	

c. How often is the IWS to be updated?

*As required*

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(t)(1)]

Yes	No
<input checked="" type="checkbox"/>	

If no, provide the CA's definition of "significant industrial user."

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

F. CONTROL MECHANISM			
1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).	<i>Permit</i>		
b. What is the maximum term of the control mechanism?	<i>1 year</i>		
2. Does the approved control mechanism include the following? [403.8(f)(1)(iii)]	<b>Yes</b>	<b>No</b>	
a. Statement of duration	X		
b. Statement of nontransferability	X		
c. Effluent limits	X		
d. Self-monitoring requirements			
• Identification of pollutants to be monitored	X		
• Sampling location	X		
• Sample type	X		
• Sampling frequency	X		
• Reporting requirements	X		
• Notification requirements	X		
• Record keeping requirements	X		
e. Statement of applicable civil and criminal penalties	X		
f. Applicable compliance schedule	X		
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?	<del>N/A</del>	Yes	No
	X		
4. Does the program identify designated discharge point(s) for trucked or hauled wastes? [403.5(b)(8)] If yes, described the discharge point(s) (including security procedures).	X		
G. APPLICATION OF STANDARDS			
1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]		Yes	No
		X	
2. If there is more than one treatment plant, were local limits established specifically for each plant?	<del>N/A</del>	Yes	No
	X		

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

### G. APPLICATION OF STANDARDS (continued)

3. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL]  
[403.5(c)(1); 403.8(f)(4)]

**X**

#### Panel: Technical Evaluation (not all 10 pollutants evaluated)?

	Heavy Metals Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric) mg/L
	Yes	No	Yes	No	Yes	No	
	a. Arsenic (As)	X		X		X	
b. Cadmium (Cd)	X		X		X		0.05
c. Chromium (Cr)	X		X		X		1.0
d. Copper (Cu)	X		X		X		0.5
e. Cyanide (CN)	X		X		X		0.1
f. Lead (Pb)	X		X		X		0.45
g. Mercury (Hg)	X		X		X		0.002
h. Molybdenum (Mo)		X		X		X	NA
i. Nickel (Ni)	X		X		X		1.0
j. Selenium (Se)		X		X		X	NA
k. Silver (Ag)	X		X		X		0.003
l. Zinc (Zn)	X		X		X		1.0
m. Other (specify) <i>Phenol</i> ;	X/X		X/X		X/X		1.0; 75.0

### O&G

### H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
<b>a. Inspections</b>				
• CIUs	<i>1/year</i>			1/year
• Other SIUs	<i>1/year</i>			1/year
<b>b. Sampling by POTW</b>				
• CIUs	<i>2-5 year</i>			1/year
• Other SIUs	<i>2-5 year</i>			1/year
<b>c. Self-monitoring</b>				
• CIUs	<i>City does.</i>			2/year
• Other SIUs	<i>City does.</i>			2/year
<b>d. Reporting by POTW</b>				
• CIUs	<i>Not required.</i>			2/year
• Other SIUs	<i>Not required.</i>			2/year

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			
1. Does the CA's program define "significant noncompliance"?	<input checked="" type="checkbox"/>		
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	<input checked="" type="checkbox"/>		
If no, provide the CA's definition of "significant noncompliance."			
2. Does the CA have an approved, written ERP? [403.8(f)(5)]		<input checked="" type="checkbox"/>	
3. Indicate the compliance/enforcement options that are available to the POTW in the event of IU noncompliance. [403.8(f)(1)(vi)]			
a. Notice or letter of violation	<input checked="" type="checkbox"/>	f. Administrative Order	<input checked="" type="checkbox"/>
b. Compliance schedule	<input checked="" type="checkbox"/>	g. Revocation of permit	<input checked="" type="checkbox"/>
c. Injunctive relief	<input checked="" type="checkbox"/>	h. Fines (maximum amount)	<input checked="" type="checkbox"/>
d. Imprisonment	<input checked="" type="checkbox"/>	• Civil	\$1,000/day/violation
e. Termination of service	<input checked="" type="checkbox"/>	• Criminal	\$ 1,000/day/violation
		• Administrative	\$ ____/day/violation
II. DATA MANAGEMENT/PUBLIC PARTICIPATION			
1. Does the approved program describe how the POTW will manage its files and data?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The City's program files are maintained as hard copies.</i>			
Are files/records		computerized?	
	<input type="checkbox"/>		<input type="checkbox"/>
	<input type="checkbox"/>	hard copy?	<input checked="" type="checkbox"/>
	<input type="checkbox"/>		<input type="checkbox"/>
2. Are program records available to the public?		<input checked="" type="checkbox"/>	
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]		<input checked="" type="checkbox"/>	

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

### K. RESOURCES

1. What are the resource allocations for the following pretreatment program components:

- a. Legal assistance
- b. Permitting
- c. Inspections
- d. Sample collection
- e. Sample analysis
- f. Data analysis, review, and response
- g. Enforcement
- h. Administration?
- TOTAL

MF
0.1
0.1
0.1
0.6
0.1
0.1
0.1
0.5
1.7

2. Identify the sources of funding for the pretreatment program. [403.8(f)(3)]

- a. POTW general operating fund
- b. IU permit fees
- c. Industry surcharges

X
X
X

- d. Monitoring charges
- e. Other (specify)

X

### L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY:	<i>Gene Allen &amp; Bob Haas</i>	DATE:	<i>August 10, 2007</i>
TITLE:	<i>Pretreatment Technician &amp; WWTP Coordinators</i>	TELEPHONE:	<i>513.367.3725</i>

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FILE REVIEW WORKSHEET

IV. FILE REVIEW WORKSHEET

IU name Premier Inks

INSTRUCTIONS: For each pollutant required to be regulated record the local limit and categorical standard (if applicable) that the CA should be applying and enforcing. Then record that actual discharge limits applied through the control mechanism (permit). Also record the sample type and frequency required by the control mechanism.

Permit issuance date 5/11/06

Permit expiration date 6/15/07

Parameter	mg/L Local Limit	Categorical Standards		Permit Discharge Limits		Required Sample Type	Required Sample Frequency
		Daily Average	Long-Term Average	Daily Average	Long-Term Average		
As	0.050	NA	NA	0.050	NA	NA	NA
Cd	0.050			0.050			
Cr	1.000			1.000			
Cu	0.500			0.500			
CN	0.100			0.100			
Pb	0.450			0.450			
Hg	0.002			0.002			
Ni	1.000			1.000			
Oil & Grease	75.00			75.00			
Phenols	1.00			1.00			
Ag	0.003			0.003			
Zn	1.000			1.000			

Comments  
pH 5.0-9.0su ↓ ↓ 5.0-9.0su ↓ ↓

City does all monitoring for IU.

Permit renewed on 4/24/07. Expires on 6/15/08

PERMIT LIMITS WORKSHEET

COMPLETED BY: Mari Piekutowski

TITLE: Environmental Specialist 2

DATE: 8/22/07

TELEPHONE: 937.285.6108

FILE REVIEW WORKSHEET (Continued)

V. IU SELF-MONITORING WORKSHEET

IU name Premier LAKS

INSTRUCTIONS: Review IU self-monitoring reports and data and record the information in the appropriate columns below.

IU Self-Monitoring

Date Sample Collected	Date Report Received	Date Report Due	Days Late	Pollutants Monitored	Sample Type	Pollutants Missing
		NA - City does self-monitoring				

	Yes	No
Do reports indicate 40 CFR Part 136 analytical methods were used?		
Were self-monitoring reports signed/certified?		
List any reports not signed/certified.	NA	
If subject to TTO certification, were they submitted as required?		

IU SELF-MONITORING WORKSHEET  
 COMPLETED BY: Mari Piekutowski  
 TITLE: Environmental Specialist TELEPHONE: 937.785.6100  
 DATE: 8/22/07







FILE REVIEW WORKSHEET (Continued)

<b>IX. CIUs WORKSHEET</b>	
IU name <u>Primer Inks</u>	
<i>INSTRUCTIONS: Record information from IU file, note any apparent misapplication of the applicable categorical pretreatment standards.</i>	
1. IU category (s) <p style="text-align: center;">Not Categorical.</p>	
2. List all applicable subcategories. <p style="text-align: center;">NA</p>	
3. a. Does the sampling location contain nonregulated or dilution wastestreams?	Yes No
• CA	
• IU	
b. If yes, is the CWF applied?	
c. If yes, is FWA applied?	
NA	
4. Is the facility subject to production-based standards?	
a. If yes, provide the following information.	
• Average production	
• Average process flow	
NA	
5. Provide the following information on TTO monitoring and reporting (if applicable).	
a. Date initial scan performed	
b. Date organic management plan submitted	
c. Date(s) certifications submitted (in the past 12 months)	
d. Date(s) monitoring performed (in the past 12 months)	
NA	

CIUs WORKSHEET COMPLETED BY: <u>Mani Pektowski</u> TITLE: <u>Environmental Specialist</u>	DATE: <u>8/22/07</u> TELEPHONE: <u>937.285.6108</u>
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FILE REVIEW WORKSHEET

IV. FILE REVIEW WORKSHEET

IU name JTM JTM Food Group

INSTRUCTIONS: For each pollutant required to be regulated record the local limit and categorical standard (if applicable) that the CA should be applying and enforcing. Then record that actual discharge limits applied through the control mechanism (permit). Also record the sample type and frequency required by the control mechanism.

Permit issuance date 5/11/06

Permit expiration date 6/15/07

Parameter	mg/L Local Limit	Categorical Standards		Permit Discharge Limits		Required Sample Type	Required Sample Frequency
		Daily Average	Long-Term Average	Daily Average	Long-Term Average		
As	0.050	NA	NA	0.050	NA	NA	NA
Cd	0.050			0.050			
Cr	1.000			1.000			
Cu	0.500			0.500			
CN	0.100			0.100			
Pb	0.450			0.450			
Hg	0.002			0.002			
Ni	1.000			1.000			
Other	75.00			75.00			
Phenols	1.00			1.00			
Ag	0.003			0.003			
Zn	1.000			1.000			

Comments

pH 5.0-9.05u ↓ ↓

City does self monitoring for its FLS

New permit issued 6/7/07. Expiration date 6/15/08

PERMIT LIMITS WORKSHEET

COMPLETED BY: Mari Pielawowski

TITLE: Environmental Specialist 2

DATE: 8/22/07

TELEPHONE: 937.785.6108

FILE REVIEW WORKSHEET (Continued)

V. IU SELF-MONITORING WORKSHEET

IU name JTM Food Group

INSTRUCTIONS: Review IU self-monitoring reports and data and record the information in the appropriate columns below.

IU Self-Monitoring

Date Sample Collected	Date Report Received	Date Report Due	Days Late	Pollutants Monitored	Sample Type	Pollutants Missing
		<u>City does self-monitoring</u>				

	Yes	No
Do reports indicate 40 CFR Part 136 analytical methods were used?		
Were self-monitoring reports signed/certified?		
List any reports not signed/certified.		
If subject to TTO certification, were they submitted as required?		

IU SELF-MONITORING WORKSHEET COMPLETED BY: <u>Man Piekutowski</u> TITLE: <u>Environmental Specialist</u>	DATE: <u>8/22/07</u> TELEPHONE: <u>937-285 6108</u>
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FILE REVIEW WORKSHEET (Continued)

VII. VIOLATIONS BASED ON IU SELF-MONITORING AND POTW MONITORING DATA WORKSHEET

IU name: JTM Food Group

INSTRUCTIONS: Review IU self-monitoring and POTW monitoring data; compare this information to the permit limits; and list all violations.

Date of Violation	Pollutant	Type (Daily or Long-Term Average)	Monitoring Result	POTW Monitoring or IU Self-Monitoring	Date IU Notified CA	Date Re-sampling Results Submitted	Days of Violation
✓ 6/13/06	Phenols	D	2.1	POTW	—	7/16/06	27
✓ 9/12/06	CELT	D	77.0 (N)	POTW	—	9/20/06	21
✓ 9/20/06	CELT	D	140 (N)	POTW	—	10/3/06	6
✓ 10/3/06	CELT	D	340 (N)	POTW	—	10/3/06	1
✓ 11/13/06	CELT	D	160 (N)	POTW	—	11/24/06	9
<del>11/13/06</del>	<del>CELT</del>	<del>D</del>	<del>172</del>	<del>POTW</del>	<del>—</del>	<del>—</del>	<del>—</del>
✓ 11/12/07	CELT	D	5900 (N)	POTW	—	—	—
✓ 12/5/06	CELT	D	85 (S)	POTW	—	1/16/07	37
✓ 1/8/07	CELT	D	1000 (S)	POTW	—	1/10/07	2
✓ 1/9/07	CELT	D	120 (S)	POTW	—	1/10/07	1
✓ 1/16/07	CELT	D	1000 (S)	POTW	—	—	—
✓ 1/17/07	CELT	D	76 (S)	POTW	—	—	—
✓ 2/15/07	CELT	D	3000 (S)	POTW	—	2/16/07	1
✓ 2/17/07	CELT	D	170 (S)	POTW	—	2/13/07	6
✓ 2/18/07	CELT	D	85 (S)	POTW	—	—	5
✓ 2/19/07	CELT	D	19,000 (S)	POTW	—	—	4
✓ 2/12/07	CELT	D	270 (S)	POTW	—	2/13/07	1
✓ 6/15/07	CELT	D	80 (S)	POTW	—	6/16/07	—
<del>6/16/07</del>	<del>CELT</del>	<del>D</del>	<del>83 (S)</del>	<del>POTW</del>	<del>—</del>	<del>6/16/07</del>	<del>—</del>
✓ 6/2/07	CELT	D	570 (N)	POTW	—	—	—
✓ 6/2/07	CELT	D	270 (N)	POTW	—	—	—

100% IU/0% POTW

IU SELF-MONITORING AND POTW MONITORING DATA WORKSHEET COMPLETED BY: <u>Mari Piekutowski</u> TITLE: <u>Environmental Specialist</u>	DATE: <u>6/22/07</u> TELEPHONE: <u>937.785.1406</u>
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TRC CELT = 75 \* 1.4 = 105

FILE REVIEW WORKSHEET (Continued)

VI. POTW MONITORING REPORTS WORKSHEET

IU name JTM JTM Food Group

INSTRUCTIONS: Review POTW monitoring records and enter the information in column 1 and 2. For the other columns either 1) note the actual data in the appropriate columns, or 2) indicate with a yes (Y) or no (N) whether the information was found in the POTW's monitoring records. Indicate if sample type was inappropriate, if chain-of-custody was incomplete, or if analytical methods other than Part 136 methods were used.

Date Sample Collected	Pollutants Monitored	Sample Time	Flow Rate	Sample Type	Preservation Method	Personnel	Chain-of-Custody	40 CFR Part 136 Analytical Techniques
6/13-4/06	Phenol, O&T, Cu, Ni, Zn, BOD	Y	N	Y	Y	Y	Y	Y
	BS, As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn							
6/21/06	NH <sub>3</sub> , BOD, BS, Cu, Pb, Hg, Ni, Ag, Zn	Y	N	Y	Y	Y	Y	Y
7/10, 12/06	Phenol	Y	N	Y	Y	Y	Y	Y
9/13/06	Phenol, O&T, BS, BOD	Y	N	Y	Y	Y	Y	Y
9/20/06	BS, Fe, Cr, Cd, Cu, Ni, Ag, Zn							
10/10/06	O&T	Y	N	Y	Y	Y	Y	Y
10/10-3/06	O&T	Y	N	Y	Y	Y	Y	Y
11/13/06	O&T	Y	N	Y	Y	Y	Y	Y
11/22/06	O&T	Y	N	Y	Y	Y	Y	Y
12/13/06	O&T, BOD	Y	N	Y	Y	Y	Y	Y
1/17/07	O&T	Y	N	Y	Y	Y	Y	Y
12/5-6/06	Cd, Cr, Phenols, Hg, Ag, As, Cu, Ni, Pb, Zn, BOD, BS, NH <sub>3</sub>	Y	N	Y	Y	Y	Y	Y
1/6-10/07	O&T	Y	N	Y	Y	Y	Y	Y
1/22-4/07	O&T	Y	N	Y	Y	Y	Y	Y
1/16-11/07	O&T	Y	N	Y	Y	Y	Y	Y
1/25/07	O&T	Y	N	Y	Y	Y	Y	Y
2/5-9/07	O&T	Y	N	Y	Y	Y	Y	Y

N-####  
S-####

POTW MONITORING REPORTS WORKSHEET COMPLETED BY: Mari Piekutowski DATE: 8/22/07  
 TITLE: Environmental Specialist TELEPHONE: 937.785.6108

FILE REVIEW WORKSHEET (Continued)

VIII. ENFORCEMENT ACTIONS AGAINST IU WORKSHEET

IU name JTM

INSTRUCTIONS: Record violations, (e.g. 3/15/91, zinc), the enforcement actions taken by the CA (e.g. telephone, 4/1/91) and the response of the IU (e.g. re-sampled, 4/15/91 - returned to compliance).

Date of Violation	Nature of Violation	Action Taken	Action Date	IU Response	Response Date
11/1/06	Slug load	NOV	11/2/06	Letter	11/9/06
6/13/06	Phenols	NOV	6/22/06	Letter	6/29/06
9/12/06	pH, O&H	NOV	9/27/06	Letter	9/28/06
9/25/06, 10/2/06	O&H	Letter	10/26/06	-	-
11/13/06	O&H	NOV	11/21/06	Letter	11/28/06
12/5/06	O&H	NOV	1/3/07	Letter	1/9/07
3/6/07	SNC	Letter & publish	3/6/07		
8/2/07	O&H	NOV	8/22/07		
6/8/07	O&H	NOV	6/25/07	Letter	7/3/07

Spills, slugs, and accidental discharges Y Date of spill/slug 12/13/06 Time CA notified 1430

Description of spill/slug odor complaint, sample grey/black w/odor

CA response Letter to Joe Maas (JTM)

Discharge/Slug = 11/1/06 1350 hrs

ENFORCEMENT ACTIONS AGAINST IU WORKSHEET COMPLETED BY: <u>Mani Piekutowski</u>	DATE: <u>8/22/07</u>
TITLE: <u>Environmental Specialist</u>	TELEPHONE: <u>937.765.6106</u>

FILE REVIEW WORKSHEET (Continued)

<b>IX. CIUs WORKSHEET</b>	
IU name <u>JTM Food Group</u>	
<i>INSTRUCTIONS: Record information from IU file, note any apparent misapplication of the applicable categorical pretreatment standards.</i>	
1. IU category (s) <u>Not categorical</u>	
2. List all applicable subcategories.  <u>NA</u>	
3. a. Does the sampling location contain nonregulated or dilution wastestreams?	Yes      No
• CA	
• IU	
b. If yes, is the CWF applied?	
c. If yes, is FWA applied?	
<u>NA</u>	
4. Is the facility subject to production-based standards?	
a. If yes, provide the following information.	
• Average production	
• Average process flow	
<u>NA</u>	
5. Provide the following information on TTO monitoring and reporting (if applicable).	
a. Date initial scan performed	
b. Date organic management plan submitted	
c. Date(s) certifications submitted (in the past 12 months)	
d. Date(s) monitoring performed (in the past 12 months)	
<u>NA</u>	

CIUs WORKSHEET COMPLETED BY: <u>Manik Antonowski</u> TITLE: <u>Environmental Specialist</u>	DATE: <u>8/24/07</u> TELEPHONE: <u>937.285.6106</u>
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