



Environmental
Protection Agency

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

March 14, 2011

Mayor and Council
City of London
102 South Main Street
London, OH 43140

Re: Industrial Pretreatment Compliance Inspection, February 23, 2011

Ladies and Gentlemen:

On February 23, 2011, I conducted a Pretreatment Compliance Inspection (PCI) of the City of London's Industrial Pretreatment Program (IPP). During the inspection, I interviewed Dan Leavitt and reviewed program files at his office. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the London National Pollutant Discharge Elimination System (NPDES) permit. Attached you will find the PCI report.

The findings of the PCI are as follows:

1. Overall, the London IPP has been effective in controlling industrial user discharges to the wastewater treatment plant (WWTP). There was one episode of an industrial user causing interference or pass through during the PCI time period from May 2008 to December 2010.
2. The City of London has submitted the required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in their NPDES permit for the PCI time period.
3. No reportable non-compliance (RNC) was identified during the PCI. Industrial user self-monitoring and London independent user sampling have been conducted according to program requirements for the PCI time period.
4. There was no instance of industrial user significant non-compliance (SNC) occurred during the PCI time period.
5. The City of London only conducted one sampling event for Bodycote in 2008. Please sample each industry at least twice per year.

6. The City of London did not conduct an inspection of London Correctional Institution (LCI) in 2008.
7. LCI only conducted one sampling event in 2010. LCI should conduct at least two sampling events per year.

The following required actions by London are necessary to address these deficiencies:

1. Please re-issue all industrial user permits.
2. Please update your sewer use ordinance to include the streamlining rules and the technical limits justification. These modifications must be submitted to the Agency as soon as possible.
3. Please conduct at least two sampling events per year at each significant industrial user (SIU).
4. Please inspect each SIU at least once per year.
5. Please insure that each SIU conducts at least two sampling events per year. A notice of violation letter must be sent to a SIU if they fail to sample at least twice per year.
6. Please be very specific when listing the sampling location in the industrial user permit. You stated during the PCI that the City plans to physically label the sampling outfall manholes.

In addition to the above required actions, several recommended actions were identified to further address program deficiencies and/or improve the effectiveness of the program. These actions include:

1. It is recommended that a new plant flow schematic be requested with the industrial user permit renewal:
2. It is recommended to obtain a new plant flow schematic during annual inspections to compare against the previous plant flow schematic to determine if there were changes at the plant.
3. It is recommended to include specific language in the civil and criminal penalties section of the industrial user permit, i.e., include \$1,000 fine and/or six month jail time penalties for violations.

No program deficiencies were identified during the PCI. Please continue to:

1. Ensure that the minimum industrial user inspection frequencies are met and documented in program files. It is recommended that cover letters summarizing inspection findings and required actions are continued to be sent along with the inspection report to the industrial users.
2. London shall continue ongoing efforts to identify and categorize all industrial users, including non-significant industrial users. Industrial user information, including non-significant industrial users, shall be kept updated on Form AR-3 Industrial User Inventory and reported annually to the Ohio EPA in the London Industrial Pretreatment Program Annual Report.
3. London must periodically monitor (sample and/or inspect) non-significant industrial users at a frequency to ensure compliance with pretreatment standards and requirements. Updated information must be kept in the industrial user files.

Please acknowledge the receipt of this letter no later than March 31, 2011.

Ohio EPA recognizes the continuing commitment demonstrated by the Mayor and Council and the London WWTP staff to implement state and federal pretreatment requirements. The required changes to the industrial user permits can be made when the industrial user permit needs to be renewed. If you have any questions regarding the inspection findings feel free to contact me by e-mail at greg.sanders@epa.state.oh.us or phone at (614) 728-3851.

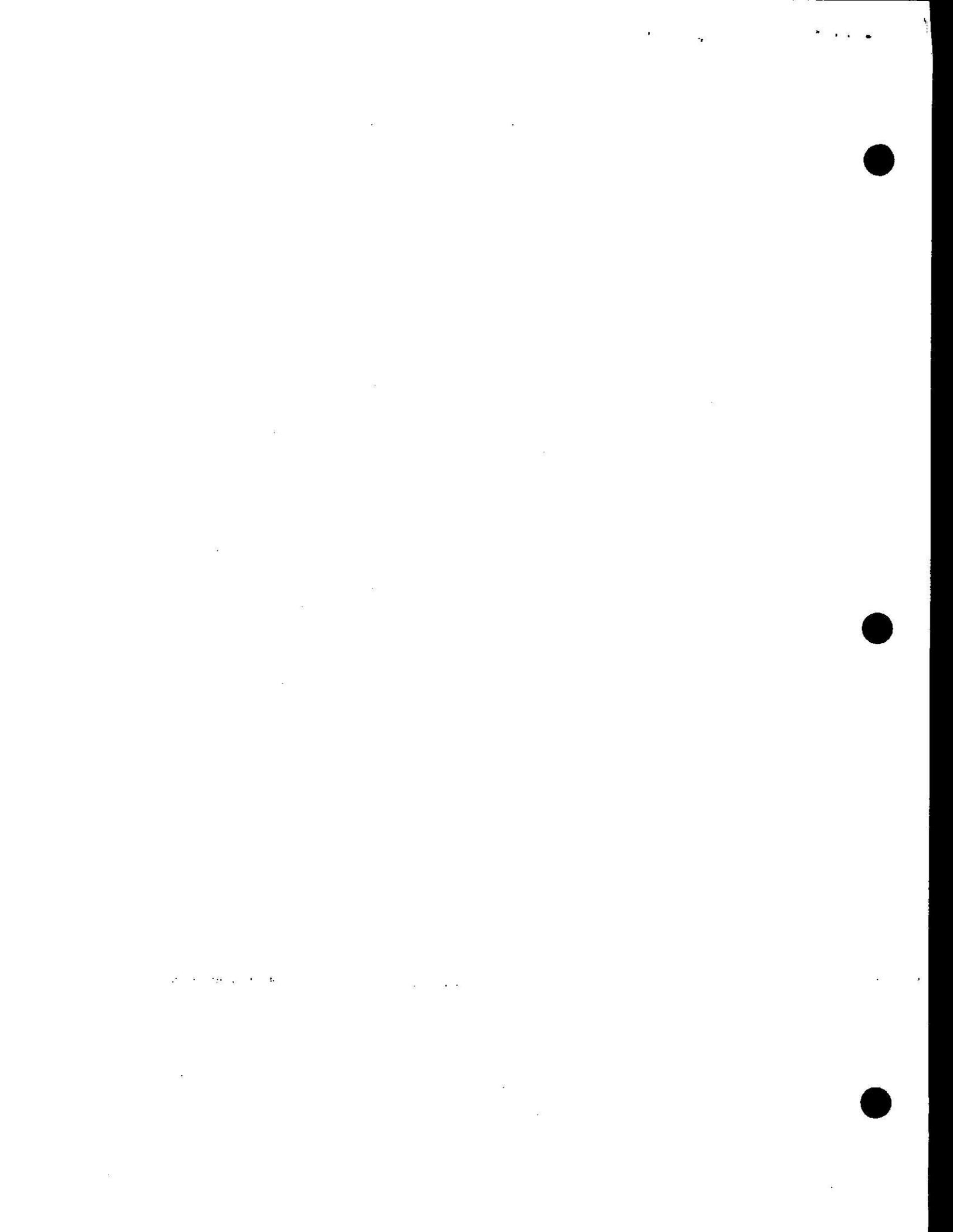
Sincerely,



Greg Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: City of London PCI Forms

c: Dan Leavitt, City of London WWTP
Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO





Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME City of London WWTP		PERMIT NUMBER 4PC00003*LD	FACILITY NUMBER OH0023779
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED February 23, 2011

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
**City of London WWTP
4080 State Route 56 S.E.
London, OH 43140**

MAILING ADDRESS OF FACILITY
**Mayor and Council
City of London
102 South Main Street
P.O. Box 188
London, OH 43140**

CONTACT (NAME/TITLE/PHONE)
Jan Leavitt, Operations Manager & Pretreatment Coordinator; 740.852.0279

FACILITY EVALUATION

(S = Satisfactory, M = Marginal, U = Unsatisfactory)

S	Pretreatment Compliance Inspection (PCI)		
	Report attached		
	Inspection period; May 2008 through Dec. 2010		

Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders <i>Gregory L. Sanders</i>	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 3-4-2011
Signature of Reviewer Jeff Bohne, Supervisor <i>Jeff Bohne</i>	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 3/7/11

Form 3560

WENDB AND RNC WORKSHEET PCI/Audit Checklist

FACILITY INFORMATION

Name City of London WWTP	
OH Number OH0023779	NPDES Number 4PC00003*LD
Date of Inspection February 23, 2011	

I. WENDB DATA ENTRY WORKSHEET

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

	Data	Checklist Reference	PCS Code
Number of SIUs	6	II.C.1	SIUS
Number of CIUs	1	II.C.1	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	NOCM
Number of SIUs not inspected or sampled	0	II.E.2	NOIN
Number of SIUs in SNC with standards or reporting	0	II.E.2	PSNC
Number of SIUs in SNC with self-monitoring	0	II.E.2	MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	II.E.2	SNIN

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
0	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
0	Failure to submit required reports within 30 days	I	
0	Failure to meet compliance schedule milestone date within 90 days	I	
0	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
0	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
0	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
0	Other (specify) :	II	
SNC			
0	Control Authority in SNC for violation of any Level I criterion		
0	Control Authority in SNC for violation of two or more Level II criterion		

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.

SECTION I: IU IDENTIFICATION

FILE 1 Industry name and address
Bodycote
443 East High Street
London, OH 43140

Type of industry
Hot isostatic pressing, vacuum heat treating & kolsterising (surface hardening of stainless steel)

IU CLASSIFICATION BY CA:

CIU 40 CFR _____

Category(ies) _____

Non-categorical SIU

Non SIU

Average total flow (gpd)

11,402

Average process flow (gpd)

950

Industry visited during audit?

Yes

No

COMPLIANCE STATUS

SNC (period:)

Noncompliance/corrected

Noncompliance/continuing

In compliance

Explanation: **IU Permit No. 07-London-002A effective 7-1-2007; Non-categorical SIU; IU permit application dated October 12, 2005. No violations. Permit expires March 31, 2011.**

Comments: **Chris Gattie, General Manager 740.852.5000**
Doug Ridgeway, Plant Manager 740.852.4955

Raw materials – argon and nitrogen.

Pretreatment system involves ph adjustment and is batch operation.

Outfall – 001; sanitary sewer manhole south of plant.

Flow schematic was not submitted with IU permit application renewal.

Bodycote uses Belmont Labs.

Operates 3 shifts per day, 7 days per week; 25 employees total

Spill plan submitted on June 27, 2008.

MSDS provided for chemicals used.

PTI#557195 issued June 26, 2006 for pretreatment system.

Control authority inspections on May 25, 2010, June 12, 2009 & June 3, 2008.

Control authority sends cover letter and copy of inspection report to IU after inspection.

Requested that old flow schematic be compared with a new plant schematic during annual inspections.

Control authority takes samples and Ginosko Laboratories provides analysis.

Control authority sampling on May 25, 2010 and October 4, 2010. No violations.

Control authority sampling on June 23, 2009 and November 3, 2009. No violations.

Control authority sampling on July 8, 2008. No violations. CA only conducted one sampling event.

IU sampling by Belmont Labs on March 26, 2010 and September 17, 2010. No violations.

IU sampling by Belmont Labs on March 19, 2009 and September 4, 2009. No violations.

IU sampling by Belmont Labs on March 27, 2008 and September 24, 2008. No violations.

FILE <u>2</u> Industry name and address Armaly Brands, fka, Church & Dwight 110 West First Street London, OH 43140	Type of industry Manufacturers brillo steel wool soap pads & softener Sheets SIC Code(s): 3291 - Abrasive products
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<input type="checkbox"/> CIU 40 CFR Category(ies) _____ <input checked="" type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) 12,160	Average process flow (gpd) 12,160
	Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

EXPLANATION: IU Permit No. 07-London-003A effective 7-1-2007; Non-categorical SIU; IU permit application signed October 31, 2005. No violations. Permit expires March 31, 2011.

Comments: Jackie Holton, HR, Safety & Environmental 740.852.3621

Raw materials – sodium nitrite, tallon fatty acid, mackamide, sodium hydroxide, soda ash, metasilicate, ammonyx, alfonic & steel wire.

Pretreatment system involves ph adjustment and is continuous operation.

Contact water, boiler feed, process waste water and sanitary wastewater is generated at the facility.

Outfall – 001; sanitary sewer manhole on east end of plant on First Street by warehouse.

Flow schematic was on file and dated May 28, 2010.

Armaly Brands uses Ginosko Laboratories.

Operates 3 shifts per day, 6 days per week; 54 employees total

No spill plan on file.

MSDS provided for chemicals used.

Control authority inspections on May 27, 2010, June 16, 2009 & June 2, 2008.

Control authority sends cover letter and copy of inspection report to IU after inspection.

Requested that old flow schematic be compared with a new plant schematic during annual inspections.

Control authority takes samples and Ginosko Laboratories provides analysis.

Control authority sampling on May 24, 2010 and November 9, 2010. No violations.

Control authority sampling on May 26, 2009 and November 9, 2009. No violations.

Control authority sampling on May 29, 2008 and December 29, 2008. No violations.

IU sampling by Ginosko Laboratories on June 7, 2010 and December 6, 2010. No violations.

IU sampling by Ginosko Laboratories on June 8, 2009 and December 1, 2009. No violations.

IU sampling by Ginosko Laboratories on June 23, 2008 and December 15, 2008. No violations.

SECTION I: IU IDENTIFICATION (Continued)

FILE <u>3</u> Industry name and address London Correctional Institution (LCI) 1580 State Route 56 London, OH 43140	Type of industry Prison with dairy barn at site	
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU 40 CFR Category(ies) _____ <input checked="" type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) 720,000	Average process flow (gpd) 36,000
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

COMPLIANCE STATUS

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

EXPLANATION: IU Permit No. 07-London-006A effective 7-1-2007; Non-categorical SIU; IU permit application signed August 31, 2010. No violations. Permit expires March 31, 2011.

Comments: David Riley, Operations Manager 740.852.2454
Robert Fitzgerald, Treatment plant coordinator 740.852.2454

Madison Correctional Institution (MCI) discharges to LCI and then discharges to City via one tap.
LCI has 2,514 inmates and 425 staff.
MCI has 2,307 inmates and 500 staff.

PTI#01-11685 issued on August 4, 2005 for pretreatment system retrofit.

Process waste water from dairy barn and sanitary wastewater is generated at the facility.

Flow schematic was submitted with IU permit renewal application.

LCI uses Belmont Labs.

No spill plan on file.

MSDS provided for chemicals used.

Control authority inspections on May 19, 2010 and June 10, 2009.

Control authority sends cover letter and copy of inspection report to IU after inspection.

Requested that old flow schematic be compared with a new plant schematic during annual inspections.

Control authority takes samples and Ginosko Laboratories provides analysis.

Control authority sampling on May 11, 2010 and October 19, 2010. No violations.

Control authority sampling on April 28, 2009 and November 25, 2009. No violations.

Control authority sampling on April 29, 2008 and December 22, 2008. No violations.

IU sampling by Belmont Labs on June 2, 2010. No limit violations, but only one sampling event.

IU sampling by Belmont Labs on May 6, 2009 and September 9, 2009. No violations.

IU sampling by Belmont Labs on June 11, 2008 and November 15, 2008. No violations.

LCI by-passed screens on May 5, 2010, due to power failure.

LCI by-passed screens on May 23, 2010 for two days.

LCI by-passed screens on February 17, 2011 for two days due to electrical problems.

Industry Name					INSTRUCTIONS: Evaluate the contents of selected IU files; emphasis should be placed on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Comments should be provided in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, enter an "x" to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.	
Bodycode	Armaly Brands	LCI	File	File		
File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
X	X	X			1. Control mechanism application form	
X	X	X			2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
X	X	X			3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X	X	X			4. Control mechanism contents	403.8(f)(1)(iii)
X	X	X			a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(A)
X	X	X			b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)
X	X	X			c. Applicable effluent limits	403.8(f)(1)(iii)(C)
N/A	N/A	N/A			• Application of applicable categorical standards	403.8(f)(1)(ii)
X	X	X			- Classification by category/subcategory	
X	X	X			- Classification as new/existing source	
X	X	X			- Application of limits for all categorical pollutants	
N/A	N/A	N/A			- Application of TTO or TOMP alternative	
N/A	N/A	N/A			- Calculation and application of production-based standards	403.6
N/A	N/A	N/A			- Calculation and application of CWF or FWA	403.6(d)&(e)
X	X	X			• Application of applicable local limits	
N/A	N/A	N/A			• Application of most stringent limit	403.8(f)(1)(ii)
Comments						

File <u>1</u>	File <u>2</u>	File <u>3</u>	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
A. ISSUANCE OF IU CONTROL MECHANISM (Continued)						
X	X	X			d. IU self-monitoring requirements	403.8(f)(1)(iii)(D)
	X	X			• Identification of pollutants to be monitored	
X	X	X			• Sampling frequency	
1	1	1			• Sampling locations/discharge points defined	
X	X	X			• Reporting requirements	
X	X	X			• Appropriate sample types (grab or composite)	
X	X	X			• Record keeping requirements	403.12(o)
2	2	2			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
N/A	N/A	N/A			f. Compliance schedules/progress reports (if applicable)	
X	X	X			g. Requirement to notify CA of slug loadings	
X	X	X			h. Requirement to notify CA of spills, bypasses, upsets, etc.	
X	X	X			i. Requirement to notify CA of significant change in discharge	
X	X	X			j. 24-hour notification of violation/resample requirement	403.8(f)(1)(iii)(D)
N/A	N/A	N/A			k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)
Comments						
1 – It is recommended to list specific locations for sampling locations and discharge points in the IU permit.						
2 – It is recommended to include specific penalties in the IU permit, i.e., \$1,000 for civil penalties and \$1,000 & six months in jail, for criminal penalties.						

File <u>1</u>	File <u>2</u>	File <u>3</u>	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
B. CA COMPLIANCE MONITORING						
X	X	X			1. Inspection	
X	X	X			a. Inspection at frequency specified in approved program	403.8
X	X	X			b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
X	X	X			c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
X	X	X			2. Sampling	
X	X	X			a. Sampling at frequency specified in approved program	403.8
X	X	X			b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
X	X	X			c. Analysis for all regulated parameters	403.12(g)(1)
X	X	X			d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)

Comments

Intelligrated Products had a NOV letter sent on January 26, 2010. They had the following sampling issues:

January 20, 2009 – high pH – resample

April 19, 2009 – high O&G, Moly & NH3 – resample

January 14, 2010 – high & low pH and high nickel

January 25, 2010 – high ph

March 4, 2010 – high CBOD, NH3, TSS; cleaned discharge line

April 28, 2010 – SNC/TRC; new IU monitoring form sent by City for outfalls 002-004. Sampling 001 more for CBOD, TSS & NH3.

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW		Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES		
					1. Identification of and response to violations		403.8(f)(2)(vi)
N/A	N/A	N/A			a. Discharge violations		
N/A	N/A	N/A			• IU self-monitoring		
N/A	N/A	N/A			• CA compliance monitoring		
N/A	N/A	N/A			b. Monitoring/reporting violations		
N/A	N/A	N/A			• IU self-monitoring		
N/A	N/A	N/A			-Reporting (e.g., frequency, content, signatory requirements)		OAC 3745-3-06(F)
N/A	N/A	N/A			-Sampling (e.g., frequency, pollutants)		
N/A	N/A	N/A			-TTO requirements met		
N/A	N/A	N/A			• Notification		
N/A	N/A	N/A			-Notified CA of significant change in operation or discharge		403.12(j)
N/A	N/A	N/A			-Immediate notification of slug load discharge or accidental spill		OAC 3745-3-05
N/A	N/A	N/A			-24 hour notification after becoming aware of discharge violations		403.12(g)(2)
N/A	N/A	N/A			-Resampled/reported within 30 days of knowledge of violation		403.12(g)(2)
N/A	N/A	N/A			• Submission/implementation of slug discharge control plan		403.8(f)(2)(v)
N/A	N/A	N/A			• Met compliance schedule milestones by required dates		403.12
N/A	N/A	N/A			c. Compliance schedule violations		
N/A	N/A	N/A			• Start-up/final compliance		
N/A	N/A	N/A			• Interim dates		

Comments

ADS was removed from the industrial pretreatment program on January 1, 2009.
 Deer Creek Honey Farms was removed from the industrial pretreatment program on January 1, 2009.
 Nissen Chemitrec fka, London Industries, removed from the industrial pretreatment program on January 1, 2010.

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES (Continued)						
N/A	N/A	N/A			2. Proper calculation of SNC	403.8(f)(2)(vii)
N/A	N/A	N/A			a. Chronic	
N/A	N/A	N/A			b. TRC	
N/A	N/A	N/A			c. Pass through/interference	
N/A	N/A	N/A			d. Spill/slug load	
N/A	N/A	N/A			e. Reporting	
N/A	N/A	N/A			f. Compliance schedule	
N/A	N/A	N/A			g. Other violations (specify)	
N/A	N/A	N/A			3. Adherence to approved ERP	
N/A	N/A	N/A			a. Proper response to violation	403.8(f)(5)
N/A	N/A	N/A			b. Escalation of enforcement	403.8(f)(5)
N/A	N/A	N/A			4. Return to compliance	
N/A	N/A	N/A			a. Within 90 days	
N/A	N/A	N/A			b. Within time specified	
N/A	N/A	N/A			c. Through compliance schedule	
N/A	N/A	N/A			5. Publication for SNC	403.8(f)(2)(vii)
N/A	N/A	N/A			D. OTHER	
<p>Comments</p> <p>Will issue IU permits once Mayor approves pretreatment modifications.</p> <p>IU permits already drafted and sent to IUs for their review. Will issue final once pretreatment modifications are approved.</p> <p>Ohio Processors had discharge manhole backing up and was full of white grease on March 16, 2010. The City cleaned the line, but informed the IU that they must clean and maintain line in the future.</p> <p>The files show that the City of London only conducted one sampling event for Bodycote in 2008.</p> <p>The files do not list a flow schematic for Bodycote.</p> <p>The files show that LCI only conducted one sampling event instead of two in 2010.</p> <p>It is recommended that a new plant schematic be requested with the IU permit renewal and during annual inspections. The new flow schematic should be compared with the old flow schematic to determine if new flow or processes have been added.</p>						

SECTION I COMPLETED BY: Gregory L. Sanders <i>GLS</i>	DATE: 3-4-11
TITLE: Environmental Specialist	TELEPHONE: 614.728.3851

SECTION II: INTERVIEW

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with CA personnel, review of general and specific files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATIONS [403.18]

1. a. Describe any changes pending or completed made to the pretreatment program since the last inspection. (e.g., legal authority, local limits, multi-jurisdictional agreements, ERP, sewer use ordinance, control mechanism, etc.)

Plant upgrade completed and new plant on-line in 2009. Extended existing IU permits until modification approved. Mayor signature required on pretreatment modifications then will scan and send to Ohio EPA.

- b. Have you identified any needed changes in your program?
If yes, describe.

Yes	No
X	

Once pretreatment modifications approved by Ohio EPA, new industrial user permits will be sent to users. New permits will be flow proportional not time proportional.

B. LEGAL AUTHORITY [403.8(f)(1)]

1. Are there any contributing jurisdictions discharging wastewater to the POTW?
If yes, explain how these multi-jurisdictional agreements have been incorporated into your approved program. **LCI is located outside City, but has 20-year agreement for wastewater treatment.**

Yes	No
	X

2. Do you experience difficulty in implementing your legal authority [i.e., SUO, multi-jurisdictional agreement (e.g. permit challenged, entry refused, penalty appealed)]?
If yes, explain.

Yes	No
	X

C. IU CHARACTERIZATION [403.8(f)(2)(I)&(ii)]

1. Have you changed how SIUs are classified? No, done with compliance history with respect to concentration.

No, SIUs classified from N1 to N3 for non-categorical and C1 to C3 for categorical. Ohio EPA recommended to classify with respect to flow which is being considered.

2. a. How do you identify and classify new IUs? (i.e., Industrial Waste Survey); **water office, Mayor, Council, sewer taps and plan reviews.**

b. How and when do you identify changes in wastewater discharges at existing IUs (including contributing jurisdictions)?

Water office & brief site visits.

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

1. a. How many and what percent of the total SIUs are not covered by an existing, unexpired permit, or other individual control mechanism? [WENDB-NOCM] [RNC-II]

Number	Percent
0	0%

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.

2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW?

Yes	No
	X

b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss:

3. a. Do you accept any waste by truck, rail, or dedicated pipe?

Yes	No
X	
	X

b. Is any of the waste hazardous as defined by RCRA?

If a. or b. above is yes, explain.

c. Describe your program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)] **Sludge haulers sign in log for disposal access. Industrial user discharge permit issued to driver and company. Permit holders are bonded and keep manifest of loads. Each discharge is sampled and isolated in holding tank prior to discharge to digesters.**

4. What limits (categorical, local, other) do you apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)] **Local limits, 503 sludge standards and surcharge limits apply to hauled waste.**

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. How do you keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

OTCO and OWEA events

Local limits evaluation: [403.8(f)(4); 122.21(j)]

Yes	No
X	

2. Have you identified any pollutants of concern beyond those in your local limits?
 (e.g., conventionals, organics, etc.) **Barium, recent study points to lab issue with Ginosko Laboratories.**
 If yes, how has this been addressed? **Discussing options with lab & using other labs.**

3. What problems, if any, were raised during local limit implementation or reissuance of industrial permits? How were these problems addressed? **None**

F. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC-II]
 (Define the 12 month period - **January 2010 to December 2010.**)

a. Not sampled or not inspected at least once [WENDB-NOIN]	0	0%
b. Not sampled at least once	0	0%
c. Not inspected at least once (all parameters)?	0	0%
d. In SNC with self monitoring and not inspected or sampled?	0	0%

If any, explain. Indicate how percentage was determined (e.g. actual, estimated).

2. Who performs your compliance sampling and analysis?

- Metals
- Cyanide
- Organics
- Conventionals
- Other (specify)

Sampling	Analysis
City of London	Ginosko

3. What QA/QC techniques do you use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vi)]

London only does pH, splits samples; Ginosko uses proper DMR/QA.

4. Discuss any problems encountered in identification of sample location, collection, and analysis. **Plan to physically label each sampling manhole during summer months. No issues if industrial users keep discharge line cleaned and maintained.**

5. a. How and when do you evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

During annual inspection and condition of industrial user permit.

b. How many SIUs were evaluated for the need to develop slug discharge control plans in the last 2 years?

All

G. ENFORCEMENT

1. Have you experienced any of the following since the last inspection?

	Yes	No	Explain
• Interference		X	
• Pass through		X	
• Fire or Explosions		X	
• Corrosive structural damage		X	
• Flow obstructions		X	
• Excessive flow rates		X	
• Excessive pollutant concentrations		X	
• Heat problems		X	
• Interference due to O & G		X	
• Toxic fumes		X	
• Illicit dumping of hauled wastes		X	
• Worker health and safety concerns		X	
• Other (specify):		X	

a. If yes, describe the control authority's response:

Yes	No
	X

b. Were you made aware of any hazardous waste discharges to the POTW?

If yes, explain.

2. a. Do you use compliance schedules? [403.8(f)(1)(iv)(A)]

Yes	No
	X
	X

b. If yes, are they appropriate? Provide examples.

Intelligrated had sampling issues with respect to outfalls. New sampling forms created to prevent future issues.

3. ERP implementation: [403.8(f)(5)]

a. Date of last modification: **July 2007; A new draft per streamlining rules awaiting Mayor's signature, which is expected within the month.**

b. Problems with implementation: **None**

c. Is the ERP effective and does it lead to compliance in a timely manner? Provide examples if any are available.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled? [403.14] **None requested. Sampling is not confidential, other requests will be done on a case-by-case basis.**

2. How are requests by the public to review pretreatment files handled (including confidential information)?
No written policy, requests will go through Dan Leavitt.

3. a. Describe your data management system regarding pretreatment implementation and enforcement activities.
 (e.g., computerization, file system, etc.)
Self made database in Superintendent's office. City uses excel and hard copy saved. Files on computer saved and backed up monthly on a flash drive.

b. How long are records maintained? [403.12(o)] **Records maintained 5 years and discharge monitoring reports (DMRs) kept indefinitely.**

4. How do you ensure public participation during revisions to the SUO and/or local limits? [403.5(e)(3)]
Send letters to IU, three council readings and public notice in local newspaper.

5. Explain any community issues impacting the pretreatment program. (I. e., economics, politics, new development, etc.) **None**

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sampling and analysis, enforcement, and administration]. **Two people are available on a part-time basis.**

2 people are available

2. Do you have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)
 If no, explain. **London has two portable Sigma samplers and flow measuring devices for collection system.**

Yes	No
X	

3. Discuss any problems in program implementation which appear to be related to inadequate resources. (i.e., finances, equipment, personnel, training, etc.) **None**

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. Have you compiled historical data concerning influent, effluent, and sludge sampling for the POTW? If yes, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on pollutant-by-pollutant basis.

No, pretreatment program is less than five years old.

2. Have you investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes	No
	X

If yes, what was found? **None**

3. a. Have you implement any kind of public education program? **None**

Yes	No
	X
	X

b. Are there any plans to initiate a program to educate users about pollution prevention?

Explain.

4. What efforts have been taken to incorporate pollution prevention into the pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)? **Thermometer exchange and local awards.**

5. Do you have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes	No
X	

Explain. **Using methane generation from sludge processing to heat digesters.**

K. ADDITIONAL EVALUATIONS/INFORMATION

ADS, Deer Creek Honey Farms and Nissen Chemitec (fka, London Industries) are no longer classified as SIUs.

Armally Brands (fka, Church & Dwight) – discharge line being maintained, operating well.

Bodycote – operating well.

Intelligrated Products (categorical) – a few sampling issues and pH violations.

London Correctional Institution – no major issues, by-passed screens for 5 days during inspection period.

Ohio Processors – No issues since O&G now hauled to London WWTP.

Stanley Electric – operating well.

SECTION II COMPLETED BY:	Gregory L. Sanders <i>GLS</i>	DATE:	3-4-11
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

C. TREATMENT PLANT INFORMATION

INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.

1. Treatment plant name: City of London WWTP	2. Location address: 4080 S.R. 56 S.E., London, OH 43140
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3. a. NPDES permit number 4PC00003*LD / OH0023779	b. Expiration date 10-31-2014	4. Treatment plant wastewater flows	
		Design 5.8	Actual 2.37
		MGD	MGD

5. Sewer System	a. Separate % 100	b. Combined % 0	c. Number of CSOs 0
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6. a. Industrial contribution (MGD) 0.075 MGD	b. Number of SIUs discharging to plant 6 SIUs (1 is Cat)	c. Percent industrial flow to plant 3 %	6 SIUs
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7. Level of treatment	Type of Process(es)
a. Primary	WWTP upgrade completed in 2009. Screening, grit removal & primary settling & septage/FOG receiving facility
b. Secondary	Extended aeration activated sludge facility, final clarifiers, aerobic digestion w/belt thickener
c. Tertiary	UV disinfection and gas digester w/methane recovery

8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.

	Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)	Receiving Stream (Times/Year)
a. Metals	1/qtr	1/mn	1/qtr	-
b. Organics	3/wk	3/wk	1/qtr	1/mn
c. Toxicity testing	-	1/yr	-	-
d. EP toxicity				
e. TCLP				

9. Effluent Discharge		
a. Receiving water name Oak Run, Deer Creek Watershed	b. Receiving water classification WWH	c. Receiving water use AWS, IWS, PCR

d. If effluent is discharged to any location other than the receiving water, indicate where.

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

C. TREATMENT PLANT INFORMATION (Continued)	N/A	Yes	No
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)]			X
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]			
b. Has there been a pattern of toxicity demonstrated?			

12. Indicate methods of sludge disposal.			
	Quantity of sludge		Quantity of sludge
a. Land application	269	dry tons/year	e. Public distribution
b. Incineration		dry tons/year	f. Lagoon storage
c. Monofill		dry tons/year	g. Other (specify)
d. MSW landfill		dry tons/year	

D. LEGAL AUTHORITY	
1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). London City Charter, Chapters 1046, 1047 & 1049	
b. Date enacted/adopted: January 4, 2007	c. Date of most recent revisions: modifications to pretreatment program currently being reviewed by Mayor

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)] (1049.03)		X	
b. Require compliance with standards [403.8(f)(1)(ii)] (1049.03)		X	
c. Control discharges through permit or similar means [403.8(f)(1)(iii)] (1049.05)		X	
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)] (1049.05)		X	
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)] (1049.05)		X	
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)] (1049.06)		X	
g. Comply with confidentiality requirements [403.8(f)(1)(vii)] (1049.05)		X	

3. a. How many contributing jurisdictions are there?	None, one IU in township, but under 20-year agreement.
List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.	

Jurisdiction Name	Number of CIUs	Number of Other SIUs

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
		N/A
If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.). IU (LCI) under 20-year agreement.		
4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform. N/A		
a. IWS update	<input type="checkbox"/>	e. Notification of IUs
b. Permit issuance	<input type="checkbox"/>	f. Receipt and review of IU reports
c. Inspection and sampling	<input type="checkbox"/>	g. Analysis of samples
d. Enforcement	<input type="checkbox"/>	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)(1)]	Yes	No
b. Indicate which methods are to be used to update the IWS.	X	
<ul style="list-style-type: none"> • Review of newspaper/phone book • Review of water billing records • Review of plumbing/building permits 	<input type="checkbox"/> X X	<ul style="list-style-type: none"> • Onsite inspections • Permit application requirements • Citizens involvement • Other (specify)
c. How often is the IWS to be updated?	<input type="checkbox"/>	
2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(i)(1)]	Yes	No
If no, provide the CA's definition of "significant industrial user."	X	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

F. CONTROL MECHANISM			
1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).	IU permit		
b. What is the maximum term of the control mechanism?	Normally 3 years		
2. Does the approved control mechanism include the following? [403.8(f)(1)(iii)]	Yes	No	
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: be more specific in IU permit	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? IU permit issued to driver & hauling company.	N/A	Yes	No
		X	
4. Does the program identify designated discharge point(s) for trucked or hauled wastes? [403.5(b)(8)]		X	
If yes, described the discharge point(s) (including security procedures).			
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?	N/A	Yes	No
	X		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

G. APPLICATION OF STANDARDS (Continued)

3. Has the CA <u>technically evaluated</u> the need for local limits for all pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]						Yes	
Partial Technical Evaluation (not all 10 pollutants evaluated)?							
	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric) (ug/l)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)					X		139
b. Cadmium (Cd)					X		7.4
c. Chromium (Cr)					X		140
d. Copper (Cu)					X		-
e. Cyanide (CN)					X		0.013
f. Lead (Pb)					X		58
g. Mercury (Hg)					X		-
h. Molybdenum (Mo)					X		22,444
i. Nickel (Ni)					X		168
j. Selenium (Se)					X		5.6
k. Silver (Ag)						X	-
l. Zinc (Zn)					X		6.1
m. Other (specify): hex Cr					X		12

H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
a. Inspections				
• CIUs	1/yr	1/yr		1/year
• Other SIUs	1/yr	1/yr		1/year
b. Sampling by POTW				
• CIUs	2/yr	2/yr		1/year
• Other SIUs	2/yr	2/yr		1/year
c. Self-monitoring				
• CIUs	4/yr	2/yr		2/year
• Other SIUs	2/yr	2/yr		2/year
d. Reporting by IU				
• CIUs	4/yr	2/yr		2/year
• Other SIUs	2/yr	2/yr		2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			Yes	No
1. Does the CA's program define "significant noncompliance"?	<input checked="" type="checkbox"/>		<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"/>		<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 type="checkbox"/>	h. Fines (maximum amount)	<input checked="" type="checkbox"/>	
d. Imprisonment	<input type="checkbox"/>	• Civil	None listed	
e. Termination of service	<input type="checkbox"/>	• Criminal	None listed	
		• Administrative	\$1,000 /day/violation	
J. DATA MANAGEMENT/PUBLIC PARTICIPATION				
1. Does the approved program describe how the POTW will manage its files and data?			<input checked="" type="checkbox"/>	
Are files/records	<input type="checkbox"/>	computerized?	<input checked="" type="checkbox"/>	hard copy?
			<input checked="" type="checkbox"/>	
2. Are program records available to the public? Can be, no request yet made.			<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: **2 people are available**

	FTEs
a. Legal assistance	0.25
b. Permitting	0.25
c. Inspections	0.25
d. Sample collection	0.25
e. Sample analysis	0.25
f. Data analysis, review, and response	0.25
g. Enforcement	0.25
h. Administration?	0.25
TOTAL	2

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

a. POTW general operating fund	<input checked="" type="checkbox"/>	d. Monitoring charges	<input checked="" type="checkbox"/>
b. IU permit fees	<input checked="" type="checkbox"/>	e. Other (specify)	<input type="checkbox"/>
c. Industry surcharges	<input checked="" type="checkbox"/>		

L. ADDITIONAL INFORMATION

Plant upgrade completed in 2009.
 Normally IU permits issued for 3 years. Due to pretreatment program modifications, IU permits were extended. New IU permits drafted and sent to IUs for review. Will issue new IU permits after modifications approved. Plan to physically label each IU sampling outfall this summer.

ATTACHMENT B COMPLETED BY:	<i>g.l.s.</i> Gregory L. Sanders	DATE:	3-4-11
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851