



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

December 22, 2010

Delaware County Commissioners
50 Channing Street (South Wing)
Delaware, OH 43015

Re: Industrial Pretreatment Audit Inspection, December 1, 2010

Ladies and Gentlemen:

On December 1, 2010, I conducted a Pretreatment Compliance Inspection (PCI) of Delaware County's Olentangy Environmental Control Center (OECC) Industrial Pretreatment Program (IPP). During the inspection, I interviewed Martin Bell, Pretreatment Coordinator for Delaware County, and reviewed the pretreatment program files. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and Delaware County's 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 Delaware County's IPP has been successful in controlling industrial user discharges to the OECC. There have not been any episodes of industrial users causing the district's WWTP to violate their NPDES permit. All of the required and recommended actions listed in the previous inspection report have been addressed. Mr. Bell is administering the program well.
2. Delaware County has submitted 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. The PCI time period is from January of 2009 through November 2010. The program files were well organized.
3. Inspections and sampling of all required parameters were performed for the two significant industrial users in 2009 and 2010.
4. Reporting and/or sampling was late two times during the inspection period by Tracewell Systems. A notice of violation letter was issued by Delaware County for each event as required.
5. The industrial user permit application was submitted a few days late by Tracewell Systems. A notice of violation was not sent by Delaware County.
6. Two reporting violations were noted from the OECC during the inspection period. One violation for nitrite plus nitrate was listed on October 1, 2010, and one violation for phosphorus was listed on May 1, 2009. These violations were not attributed to industrial discharges.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

There are no required actions that are needed by Delaware County at this time. There is one minor recommended action by this Agency. This action is:

1. It is recommended to be consistent in the industrial user permit cover letter and its permit when referencing your sewer use resolution. The cover letter refers to it as the sewer use regulation and the industrial user permit refers to it as the sewer use resolution. It is recommended to be consistent in the cover letter and permit.

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 sent along with the inspection report to the industrial users.
2. Delaware County 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 Delaware County Industrial Pretreatment Program Annual Report.
3. Delaware County 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 January 15, 2011.

Ohio EPA recognizes the continuing commitment demonstrated by the Delaware County Pretreatment and the OECC staff to implement state and federal pretreatment requirements. 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,



Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: Delaware County PCI Forms

- c: Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO
Chad Antle, Delaware County Environmental Services
Martin Bell, Olentangy Environmental Control Center



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME OECC - Delaware County		PERMIT NUMBER 4PK00001*JD	FACILITY NUMBER OH0054399
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED December 1, 2010

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
**Olentangy Environmental Control Center (OECC)
10333 Olentangy River Road
Powell, OH 43065**

MAILING ADDRESS OF FACILITY
**Delaware County Commissioners
50 Channing Street (South Wing)
Delaware, OH 43015**

CONTACT (NAME/TITLE/PHONE)
**Chad Antle, Director of Environmental Services 740833.2240
Martin Bell, Pretreatment Coordinator 614.436.7999
Ken Rosenbaum, WWTP Supervisor 614.436.7999**

FACILITY EVALUATION

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

S	Pretreatment Compliance Inspection (PCI)		
	Report attached		
	Inspection period; Jan. 2009 through Nov. 2010		

Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 12-8-10
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 12-21-10

Form 3560

WENDB AND RNC WORKSHEET
PCI/Audit Checklist

FACILITY INFORMATION	
Name Olentangy Environmental Control Center – Delaware County	
OH Number OH0054399	NPDES Number 4PK00001*JD
Date of Inspection December 1, 2010	

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	2	II.C.1	SIUS
Number of CIUs	2	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

Abrasive Technologies
8400 Green Meadows Drive
Lewis Center, OH 43035

Type of industry

Metal finishing
SIC - 3291
NAICS - 32791

IU CLASSIFICATION BY CA:

CIU 40 CFR **433**, _____
 Category(ies) **Metal Finishing**

Non-categorical SIU

Non SIU

Average total flow (gpd)

9,900 gpd

Average process flow (gpd)

3,000 gpd

Industry visited during audit?

No

COMPLIANCE STATUS

SNC (period:)

Noncompliance/corrected

Noncompliance/continuing

In compliance

Explanation:

Comments:

IU permit application completed July 30, 2009. Doug Anderson – Compliance / Environmental 740.548.4100

IU permit issued October 1, 2009; effective through September 30, 2012

Abrasive Technologies produces abrasive coated steel cores for industrial grinding.

Operates 3 shifts - five days/week and employs 160 employees.

Sanitary flow – 6900 gpd & process flow – 3000 gpd.

Outfall is 8" sanitary sewer; manhole located in SE corner of office building, GPS coordinates given in IU application and well defined in IU permit.

Wastewater pretreatment system is 875 gpd avg with 1500 gpd max done in batch discharges. Process includes chemical precipitation, filtration, ion exchange and pH neutralization.

Facility has SPCC plan. Chemicals stored in areas that discharge to pretreatment system with a few chemicals that are stored in an area that discharge to sanitary sewer.

Enviroserve hauls their sludge.

Last two inspections by OECC were January 14, 2009 and January 27, 2010.

Outfall 001 – combined sanitary & industrial process flow

Use Test America as lab. Results taken & submitted per IU permit.

Nickel is pollutant of concern.

IU permit limits:

	Local Limit (mg/l)	Fed. LL	Fed. mn avg	sample freq.	sample type
Cyanide	0.5	1.2	0.65	Bi-monthly	Grab
Cadmium	0.1	2.77	1.71	Bi-monthly	Composite
Cromium, Total	-	2.77	1.71	Bi-monthly	Composite
Copper	0.5	3.38	2.07	Bi-monthly	Composite
Lead	0.5	0.69	0.43	Bi-monthly	Composite
Nickel	2.0	3.98	2.38	Bi-monthly	Composite
Silver	-	0.43	0.24	Bi-monthly	Composite
Zinc	2.4	2.61	1.48	Bi-monthly	Composite

pH greater than 5.0 TTO – sampling conducted semi- annually in March & September.
 bi-monthly samples taken in Nov, Jan, Mar, May, July & Sept

SECTION I: IU IDENTIFICATION (Continued)

FILE <u>2</u> Industry name and address Tracewell Systems 567 Enterprise Drive Westerville, OH 43081	Type of industry Metal finishing SIC – 3571 NAICS - 334111
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR <u>433</u> , _____ Category(ies) Metal Finishing <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) Average process flow (gpd) <p align="center">14,410 gpd 3,685 gpd</p> Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

COMPLIANCE STATUS

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

EXPLANATION: Reported and/or sampled late twice during inspection period (Jan. 2009 through Nov. 2010).

Comments

IU permit application submitted late, due 8/1/09, no NOV issued by OECC. Application only two days late.
Charles Pellock III, Director of Engineering & Operations; 614.846.6175.
IU permit issued October 1, 2009 and effective through September 30, 2012.
Tracewell Systems produces casings/shells for electronic equipment.
Operates 2 shifts - five days/week and employs 86 employees.
NCCW flow – 3685 gpd, CCW flow – 7900 gpd & sanitary flow – 2825 gpd
Sampling manhole is in southwest corner of main parking lot & adjacent to visitor's parking lot.
The pretreatment system consists of pH neutralization.
Safety Klean hauls wastes/oils.
Last two inspections by OECC were January 30, 2009 and January 22, 2010.
Use Test America as lab.
Outfall 001 – combined sanitary & industrial process flow.
Outfall 002 – 2nd chamber of pH adjustment tank (chromate line).
Outfall 003 – after 3rd weir of vibradyne line.
OECC sent two NOV's for late sampling and/or reporting on 12/17/2009 and 6/3/2010.
Chromium is pollutant of concern.

IU permit limits (outfall 001 & 002 have fed daily max & mn avg limit / outfall 003 has local limit):

	Local Limit (mg/l)	Fed. LL	Fed. mn avg	sample freq.	sample type
Cyanide	0.5	1.2	0.65	Bi-monthly	Grab
Cadminium	0.1	0.11	0.07	Bi-monthly	Composite
Cromium, Total	-	2.77	1.71	Bi-monthly	Composite
Copper	0.5	3.38	2.07	Bi-monthly	Composite
Lead	0.5	0.69	0.43	Bi-monthly	Composite
Nickel	2.0	3.98	2.38	Bi-monthly	Composite
Silver	-	0.43	0.24	Bi-monthly	Composite
Zinc	2.4	2.61	1.48	Bi-monthly	Composite

pH greater than 5.0 TTO – sampling conducted semi- annually in March & September
bi-monthly samples taken in Nov, Jan, Mar, May, July & Sept
Flow 24 hr and flow total for two months.

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.	Reg. Cite
File 1	File 2	File	File	File		
					SECTION I: IU FILE REVIEW	
					A. ISSUANCE OF IU CONTROL MECHANISM	
X	X				1. Control mechanism application form	
X	X				2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
X	X				3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X	X				4. Control mechanism contents	403.8(f)(1)(iii)
X	X				a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(A)
X	X				b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)
X	X				c. Applicable effluent limits	403.8(f)(1)(iii)(C)
X	X				• Application of applicable categorical standards	403.8(f)(1)(ii)
X	X				- Classification by category/subcategory	
X	X				- Classification as new/existing source	
X	X				- Application of limits for all categorical pollutants	
X	X				- Application of TTO or TOMP alternative	
N/A	N/A				- Calculation and application of production-based standards	403.6
N/A	N/A				- Calculation and application of CWF or FWA	403.6(d)&(e)
X	X				• Application of applicable local limits	
X	X				• Application of most stringent limit	403.8(f)(1)(ii)

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

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

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

Comments

1 -Tracewell Systems sampled/reported data late twice during inspection period of Jan. 2009 through Nov. 2010. OECC issued NOV letters for both events.

File	File	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES (Continued)						
N/A	N/A				2. Proper calculation of SNC	403.8(f)(2)(vii)
N/A	N/A				a. Chronic	
N/A	N/A				b. TRC	
N/A	N/A				c. Pass through/interference	
N/A	N/A				d. Spill/slug load	
N/A	N/A				e. Reporting	
N/A	N/A				f. Compliance schedule	
N/A	N/A				g. Other violations (specify)	
N/A	N/A				3. Adherence to approved ERP	
N/A	N/A				a. Proper response to violation	403.8(f)(5)
N/A	N/A				b. Escalation of enforcement	403.8(f)(5)
N/A	N/A				4. Return to compliance	
N/A	N/A				a. Within 90 days	
N/A	N/A				b. Within time specified	
N/A	N/A				c. Through compliance schedule	
N/A	N/A				5. Publication for SNC	403.8(f)(2)(vii)
N/A	N/A				D. OTHER	

Comments

SECTION I COMPLETED BY: Gregory L. Sanders <i>GLS</i>	DATE: <i>12-8-10</i>
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 IU 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.)

Both industrial users were issued new IU permits in October 2009.

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

Yes	No
	X

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. **Overlapping service areas – done w/political agreement.**

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)(1)&(ii)]

1. Have you changed how SIUs are classified? **No.**

2. a. How do you identify and classify new IUs? (i.e., Industrial Waste Survey);

When conducting quarterly restaurant sampling, they do windshield survey of new facilities in area. Also use newspaper to check for new industry or businesses. Inspections conducted to determine if new industry or business. The sanitary engineer's office forwards tap permits to pretreatment coordinator. Food establishments inspected to insure proper sampling port.

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

After completing site inspection.

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:

D. CONTROL MECHANISM EVALUATION (Continued)

Yes	No
X	
	X

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

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

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

Only accepted by their satellite plants (Scioto Reserve & Tartan Fields) – no industry in these developments. Waste is accepted at OECC or Alum Creek facilities.

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)] **Only county hauled waste from 100% residential areas.**

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)] **N/A**

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)]

OWEA, OTCO, continuing education credits for Class III license.

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.)

If yes, how has this been addressed?

3. What problems, if any, were raised during local limit implementation or reissuance of industrial permits? How were these problems addressed?

None, no problems with compliance.

F. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)][RNC-III]
(Define the 12 month period January 2009 to November 2010.)

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

	0 %
	0 %
	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
OECC	Alloway Lab
OECC	Alloway Lab
OECC	Alloway Lab
OECC	OECC

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)]

QA/QC done by Delaware County for conventionals .

Alloway lab does QA/QC by splits, blanks and spikes for all other parameters.

4. Discuss any problems encountered in identification of sample location, collection, and analysis. **None**

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

Done every inspection, both IUs updated SPCC plans.

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

2 / 2

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		Minimal I/I in system, but not due to industry
• 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):			

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

I/I being corrected by collections department by sewer studies. I/I peaks not as high as previous years.

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

If yes, explain.

Yes	No
	X

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

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

Yes	No
	X

G. ENFORCEMENT (Continued)

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

a. Date of last modification: **May 6, 2005**

b. Problems with implementation: **No**

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

No issues with ERP at this time.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14] **Addressed in sewer use resolution (SUR).**

2. How are requests by the public to review pretreatment files handled (including confidential information)?

No written policy – case by case.

3. a. Describe your data management system regarding pretreatment implementation and enforcement activities.

(e.g., computerization, file system, etc.)

Hard copy of lab results and IU information

Computerized reports

b. How long are records maintained? [403.12(o)] **Since pretreatment program started.**

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

4. How do you ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

All changes done by resolution by County Commissioners and read at county commission meetings.

5. Explain any community issues impacting the pretreatment program.(I. e., economics, politics, new development, etc.)

Economy & politics.

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].

3 full time employees

2. Do you have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

Yes

No

X

If no, explain.

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?) **No**
 Discuss on pollutant-by-pollutant basis.

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)?
 If yes, what was found?

Yes	No
	X

3. a. Have you implement any kind of public education program?
 b. Are there any plans to initiate a program to educate users about pollution prevention?

Yes	No
	X
	X

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)? **None.**

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

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.

K. ADDITIONAL EVALUATIONS/INFORMATION

Fats, oil & grease program includes monthly sampling of approximately 116 food establishments.

SECTION II COMPLETED BY: Gregory L. Sanders *GLS*

DATE: 12-8-10

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: OECC – Delaware County	2. Location address: 10333 Olentangy River Road Powell, OH 43065
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3. a. NPDES permit number 4PK00001*JD OH0054399	b. Expiration date 7-31-2015	4. Treatment plant wastewater flows <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Design</td> <td style="width: 25%; text-align: center;">6.0</td> <td style="width: 25%; text-align: center;">MGD</td> <td style="width: 25%; text-align: center;">Actual</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">3.65</td> <td style="text-align: center;">MGD</td> </tr> </table>		Design	6.0	MGD	Actual			3.65	MGD
Design	6.0	MGD	Actual								
		3.65	MGD								

5. Sewer System	a. Separate % 100	b. Combined % 0	c. Number of CSOs 0
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6. a. Industrial contribution (MGD) 0.024	b. Number of SIUs discharging to plant 2	c. Percent industrial flow to plant <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">% Non-domestic Flow</td> <td style="width: 50%; text-align: center;">% Industrial Flow</td> </tr> <tr> <td></td> <td style="text-align: center;">0.07 %</td> </tr> </table>		% Non-domestic Flow	% Industrial Flow		0.07 %
% Non-domestic Flow	% Industrial Flow						
	0.07 %						

7. Level of treatment a. Primary b. Secondary c. Tertiary	Type of Process(es) Bar screen, comminution & influent pumping Biological nitrification and BOD removal, secondary clarification & ferric chloride addition Mixed media filters, UV disinfection and post aeration; New centrifuge constructed, capable of increasing solids to 22%, will landfill sludge
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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/qtr	1/qtr	1/qtr
b. Organics	3/wk	3/wk	1/qtr	1/mn
c. Toxicity testing	-	1/qtr	-	1/yr
d. EP toxicity	-	-	-	1/yr
e. TCLP	-	-	-	-

9. Effluent Discharge		
a. Receiving water name Olentangy River	b. Receiving water classification EWH	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)]		X	
b. Has there been a pattern of toxicity demonstrated?			X

12. Indicate methods of sludge disposal.

	Quantity of sludge		Quantity of sludge	
a. Land application	158	dry tons/year		dry tons/year
b. Incineration		dry tons/year		dry tons/year
c. Monofill		dry tons/year		dry tons/year
d. MSW landfill	437	dry tons/year		dry tons/year
e. Public distribution				dry tons/year
f. Lagoon storage				dry tons/year
g. Other (specify)				dry tons/year

D. LEGAL AUTHORITY

a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority).

Sewer Use Resolution (SUR) – recommend dating SUR & changes / amendments.

b. Date enacted/adopted: **May 6, 2005** c. Date of most recent revisions: **N/A**

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? **1**

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

Jurisdiction Name	Number of CIUs	Number of Other SIUs
City of Columbus	0	0

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
X	

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

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform. **N/A**

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(t)(2)(i)]

Yes	No
X	

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

- | | | |
|--|--|--|
| <ul style="list-style-type: none"> • Review of newspaper/phone book • Review of water billing records • Review of plumbing/building permits | <input checked="" type="checkbox"/>

<input checked="" type="checkbox"/> | <ul style="list-style-type: none"> • Onsite inspections • Permit application requirements • Citizens involvement • Other (specify) |
|--|--|--|

c. How often is the IWS to be updated?

>5 yrs

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

Yes	No
X	

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

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

F. CONTROL MECHANISM			
a. Identify the CA's approved control mechanism (e.g., permit, etc.).			
b. What is the maximum term of the control mechanism?	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:	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	N/A		
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?	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).			
Only accept hauled waste from the county's own wastewater package plants and wastewater is from 100% residential areas.			
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)] IU Permit			
	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 technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL]
[403.5(c)(1); 403.8(f)(4)]

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		X	
b. Cadmium (Cd)			X		X		13
c. Chromium (Cr) (+6)			X		X		30
d. Copper (Cu)			X		X		51
e. Cyanide (CN)			X		X		32
f. Lead (Pb)			X		X		49
g. Mercury (Hg)			X		X		12
h. Molybdenum (Mo)							53,642
i. Nickel (Ni)			X		X		295
j. Selenium (Se)			X		X		13
k. Silver (Ag)			X		X		3.5
l. Zinc (Zn)			X		X		490
m. Other (specify): BTEX			X		X		456

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	Annual	Annual	Annual	1/year
• Other SIUs	Annual	Annual	Annual	1/year
b. Sampling by POTW				
• CIUs	Bi-Monthly	Annual	Annual	1/year
• Other SIUs	Bi-Monthly	Annual	Annual	1/year
c. Self-monitoring				
• CIUs	Bi-Monthly			2/year
• Other SIUs	Bi-Monthly			2/year
• CIUs	Bi-Monthly			2/year
• Other SIUs	Bi-Monthly			2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT

	Yes	No
1. Does the CA's program define "significant noncompliance"? SUR Chapter XVI	X	
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	X	
If no, provide the CA's definition of "significant noncompliance."		
2. Does the CA have an approved, written ERP? [403.8(f)(5)] dated 5-6-2005, approved 9-9-2005	X	
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"/>	
b. Compliance schedule	<input checked="" type="checkbox"/>	
c. Injunctive relief	<input checked="" type="checkbox"/>	
d. Imprisonment	<input type="checkbox"/>	
e. Termination of service	<input checked="" type="checkbox"/>	
f. Administrative Order	<input checked="" type="checkbox"/>	
g. Revocation of permit	<input checked="" type="checkbox"/>	
h. Fines (maximum amount)	<input checked="" type="checkbox"/>	
• Civil		\$25,000 /day/violation
• Criminal		\$25,000 /day/violation
• Administrative		\$1000/day/violation

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

	Yes	No
1. Does the approved program describe how the POTW will manage its files and data?	X	
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? Case by case	X	
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]	X	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components: **3 full time employees**

	FTEs
a. Legal assistance	3
b. Permitting	3
c. Inspections	3
d. Sample collection	3
e. Sample analysis	3
f. Data analysis, review, and response	3
g. Enforcement	3
h. Administration?	3
TOTAL	3

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 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

Sludge will be taken to landfill starting from 2010 by Paykoff Trucking. Testing will be 1/year for sludge fee weight when taken to a landfill.

GLS

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	12-8-10
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851