



Environmental
Protection Agency

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

February 1, 2011

Mayor and Council
City of Circleville
127 South Court Street
Circleville, OH 43113

**Re: Industrial Pretreatment Compliance Inspection, January 4 & 5, 2011
City of Circleville WWTP 4PD00003*PD / OH0024465**

Ladies and Gentlemen:

On January 4 & 5, 2011, I conducted a Pretreatment Compliance Inspection (PCI) of the City of Circleville's Industrial Pretreatment Program (IPP). During the first day of the compliance inspection, I interviewed Rod Lagerstam, Pretreatment Coordinator and wastewater treatment plant (WWTP) operation manager for the City of Circleville. The remainder of the first day consisted of reviewing the pretreatment files. During the second day of the compliance inspection I continued reviewing the pretreatment files and conducted an exit interview with Mr. Lagerstam. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and City of Circleville'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 City of Circleville's IPP has been successful in controlling industrial user discharges to the City of Circleville's WWTP. There have not been any episodes of industrial users causing the city's WWTP to violate their NPDES permit. All but one of the recommended actions listed in the previous inspection report have been addressed. Mr. Lagerstam is doing a good job administering the program.
2. The City of Circleville has submitted required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in the NPDES permit for the PCI time period. The PCI time period is from January 2009 through December 2010. The program files were well organized.
3. Inspections and sampling of all required parameters were performed for the significant industrial user in 2009 and 2010.

There are several required actions that are needed by City of Circleville at this time. These actions are:

1. Please prepare and submit a pollutant minimization program for silver.
2. Please submit a program modification to incorporate the federal streamlining guidance.
3. Please prepare and submit a storm water pollution prevention plan to address each outfall that discharges to waters of the state that contains storm water associated with industrial activity.
4. Request a new industrial user permit application from General Electric Company. The industrial user must submit a new application with each permit renewal.
5. Issue a new industrial user permit for General Electric Company by November 1, 2011. The industrial user permits must be issued at least every five years to an industrial user.

In addition to the above required actions, there was one recommended action that was identified. This recommended action is:

1. It is recommended to better describe the sampling outfall in the industrial user permit. This may include physically labeling the sampling manhole lid.

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. The City of Circleville 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 City of Circleville Industrial Pretreatment Program Annual Report.
3. City of Circleville 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 February 28, 2011.

Ohio EPA recognizes the continuing commitment demonstrated by the City of Circleville Pretreatment and wastewater treatment plant 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: City of Circleville PCI Forms

c: Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO
Rod Lagerstam, City of Circleville WWTP





Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME City of Circleville WWTP		PERMIT NUMBER 4PD00003*PD	FACILITY NUMBER OH0024465
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED January 4 & 5, 2011

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
**City of Circleville WWTP
799 West Main Street
Circleville, OH 43113**

MAILING ADDRESS OF FACILITY
**Mayor and Council
127 South Court Street
Circleville, OH 43113**

CONTACT (NAME/TITLE/PHONE)
Rod Lagerstam, City of Circleville WWTP, Operations Supervisor

FACILITY EVALUATION

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

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

Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders <i>gls</i>	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 1-12-11
Signature of Reviewer Jeff Bohne, Supervisor <i>JBohne</i>	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 1-24-11

Form 3560

WENDB AND RNC WORKSHEET

PCI/Audit Checklist

FACILITY INFORMATION	
Name City of Circleville	
OH Number OH0024465	NPDES Number 4PD00003*PD
Date of Inspection January 4 & 5, 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	1	II.C.1	SIUS
Number of CIUs	0	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 <u>1</u> Industry name and address GE Electric Company; Circleville Lamp Plant 599 East Ohio Street Circleville, OH 43113	Type of industry SIC #3641; Fluorescent Lamp Plant Troy Smith, EHS Manager
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) Average process flow (gpd) 113,000 gpd 65,000 gpd Industry visited during audit? No <input checked="" type="checkbox"/>

COMPLIANCE STATUS

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

Comments: **IU Permit #1-06, issued on 1-1-06, w/extension on 6-16-09; last IU application sent on 9-30-05.**
Joseph E. Pohlman, EHS Leader – 740.477.5441
Tim Truzzo, Plant Manager – 740.477.5345
Pollutants of concern – arsenic, mercury, moly, COD, BOD, SS & pH
Plant has boiler water and non-contact cooling water – each 5,000 gpd
Tank farm installed in order to slowly discharge flow over 24 hrs/day instead of 8 hrs/day from batch system.
Sampling manhole is east of Ohio Street and is located in NW corner of property.
Samples not taken in July of 2010 due to plant shutdown during that time.
Annual inspections conducted on 2-9-09 and 6-9-10.

FILE <u>2</u> Industry name and address Pine Grove (Republic Waste) 5131 Drinkle Road Amanda, OH 43102	Type of industry Landfill leachate Kay King – contact at Republic Waste
<input type="checkbox"/> CIU 40 CFR Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input checked="" type="checkbox"/> Non SIU	Average total flow (gpd) Average process flow (gpd) 6,700 gal per trip 6,700 gal per trip Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

COMPLIANCE STATUS

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

Comments;
The leachate from Pine Grove is rarely hauled to Circleville WWTP, it is now hauled to the Lancaster WWTP.
No IU permit issued, done by agreement. Last discharge was in January of 2009.
The Pine Grove landfill also takes Circleville WWTP's sludge.

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
GE Electric Company	File 1	File 2	File 3	File		
					SECTION I: IU FILE REVIEW	
					A. ISSUANCE OF IU CONTROL MECHANISM	
X				1. Control mechanism application form		
X				2. Proper IU categorization (sig cat, sig non-cat, non-sig)		
X				3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)	
				4. Control mechanism contents	403.8(f)(1)(iii)	
1				a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(A)	
X				b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)	
				c. Applicable effluent limits	403.8(f)(1)(iii)(C)	
				• Application of applicable categorical standards	403.8(f)(1)(ii)	
N/A				-Classification by category/subcategory		
N/A				-Classification as new/existing source		
N/A				-Application of limits for all categorical pollutants		
N/A				-Application of TTO or TOMP alternative		
N/A				-Calculation and application of production-based standards	403.6	
N/A				-Calculation and application of CWF or FWA	403.6(d)&(e)	
X				• Application of applicable local limits		
X				• Application of most stringent limit	403.8(f)(1)(ii)	
Comments						
1 – IU permit will need to be re-issued by November 1, 2011. GE Electric Company will need to submit a new IU permit application.						

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

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	
					1. Inspection	
X					a. Inspection at frequency specified in approved program	403.8
X					b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
N/A					c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
					2. Sampling	
X					a. Sampling at frequency specified in approved program	403.8
X					b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
X					c. Analysis for all regulated parameters	403.12(g)(1)
X					d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
Comments						

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

File 1	File	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES (Continued)						
N/A					2. Proper calculation of SNC	403.8(f)(2)(vii)
N/A					a. Chronic	
N/A					b. TRC	
N/A					c. Pass through/interference	
N/A					d. Spill/slug load	
N/A					e. Reporting	
N/A					f. Compliance schedule	
N/A					g. Other violations (specify)	
N/A					3. Adherence to approved ERP	
N/A					a. Proper response to violation	403.8(f)(5)
N/A					b. Escalation of enforcement	403.8(f)(5)
N/A					4. Return to compliance	
N/A					a. Within 90 days	
N/A					b. Within time specified	
N/A					c. Through compliance schedule	
N/A					5. Publication for SNC	403.8(f)(2)(vii)
N/A					D. OTHER	
N/A						
N/A						

Comments

SECTION I COMPLETED BY: Gregory L. Sanders <i>GLS</i>	DATE: <i>1-12-11</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 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.)

One industrial user, General Electric Company, was issued an IU permit and extension. Pine Grove, which has an agreement but no IU permit, rarely discharges to WWTP.

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. **Not exactly contributing jurisdiction, but rather areas served outside of the City. They included Eastwood Estates, youth services and Sheriff's office.**

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.**

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

A package is sent to new industry for classification. No new industry in town for awhile.

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

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

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

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? Pine Grove leachate b. Is any of the waste hazardous as defined by RCRA? If a. or b. above is yes, explain. Accepts leachate from Pine Grove landfill, very little leachate and in-frequent discharges trucked to WWTP. Last discharge was in January 2009. Discharge is done by agreement with landfill. Bible College, Stoutsville and Hammond discharge sludge to WWTP, but no septage.	Yes	No
	X	
		X

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)]

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.**

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 meetings.

Local limits evaluation: [403.8(f)(4); 122.21(j)] 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?	Yes	No
		X

3. What problems, if any, were raised during local limit implementation problems addressed? **None.**

permits? How were these

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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 2009 to December 2010**); **sampled monthly, inspected yearly**

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
Circleville WWTP	Ginosko Lab, Inc.
Circleville WWTP	Ginosko Lab
Circleville WWTP	Ginosko Lab
Circleville WWTP	Ginosko Lab

GE Electric Company uses Test America for their sampling.

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)]

Split samples every month.

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)]

No slug issues.

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

0

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):			

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

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(f)(1)(iv)(A)]
b. If yes, are they appropriate? Provide examples.

Yes	No
	X

3. ERP implementation: [403.8(f)(5)] **An ERP has been developed, but not necessary to use at this time.**

a. Date of last modification:

b. Problems with implementation:

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] **Case by case.**

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

No written policy – ask Operations Manager.

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

(e.g., computerization, file system, etc.); **Hard copy of files.**

b. How long are records maintained? [403.12(o)] **Three years kept in office.**

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

Read at council meetings.

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

Economy not allowing new industry or growth to City.

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]. **2 lab techs part time & operations manager part time.**

3 - part time

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

If no, explain.

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?) **In database, but no analysis.**
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.**

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

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

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

DATE: **1-12-11**

TITLE: **Environmental Specialist**

TELEPHONE: **614.728.3851**

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 Circleville**
2. Original pretreatment program submission approval date: **Approved March 1, 1985**
3. Required frequency of reporting to Approval Authority: **Quarterly & Annual**
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
City of Circleville WWTP	4PD00003*PD	August 1, 2009	July 31, 2014

5. Does the CA have a sludge management plan on file with Ohio EPA?	Yes	No
X		

If yes, provide the following information.

POTW Name	Date of Plan Approval
Circleville WWTP	March 18, 1991

PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM]	Prior to 1985
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2. Identify any substantial modifications the CA made in its pretreatment program in the last five years. [403.18]

Date Approved	Name of Modification
1990 & 1991	Sewer use ordinance
1991	Significant industrial user list
1991 & 1995	Local limits
1994	Enforcement response plan & permits

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 Circleville WWTP		2. Location address: 799 West Main Street P.O. Box 209 Circleville, OH 43113		
3. a. NPDES permit number 4PD00003*PD / OH0024465	b. Expiration date 7-31-2014	4. Treatment plant wastewater flows		
		Design 4.0	MGD Actual 1.3 MGD	
5. Sewer System	a. Separate % 100	b. Combined % 0	c. Number of CSOs 0	
6. a. Industrial contribution (MGD) 0.06	b. Number of SIUs discharging to plant 1	c. Percent industrial flow to plant		
		% Non-domestic Flow	% Industrial Flow 4.6 %	
7. Level of treatment	Type of Process(es)			
a. Primary	Bar screen, grit removal & primary sedimentation			
b. Secondary	Activated sludge-conventional & secondary clarification			
c. Tertiary	Chlorination & dechlorination			
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	-
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 Scioto River	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
1. 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	<input type="text"/>	dry tons/year	
b. Incineration	<input type="text"/>	dry tons/year	e. Public distribution
c. Monofill	<input type="text"/>	dry tons/year	f. Lagoon storage
d. MSW landfill	410	dry tons/year	g. Other (specify)
			<input type="text"/>
			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).

Chapter 925 – Sewers generally, of the City's Sewer Use Ordinance

b. Date enacted/adopted: _____ c. Date of most recent revisions: _____

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? **3 areas outside of City, but not actually jurisdictions**

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

Jurisdiction Name	Number of CIUs	Number of Other SIUs
Sheriff's Office	0	0
Youth Services	0	0
Eastwood Subdivision	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
	N/A

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	<input type="checkbox"/>	e. Notification of IUs	<input type="checkbox"/>	
b. Permit issuance	<input type="checkbox"/>	f. Receipt and review of IU reports	<input type="checkbox"/>	
c. Inspection and sampling	<input type="checkbox"/>	g. Analysis of samples	<input type="checkbox"/>	
d. Enforcement	<input type="checkbox"/>	h. Other (specify)	<input type="checkbox"/>	

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
X	

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

<ul style="list-style-type: none"> • Review of newspaper/phone book <input style="width: 50px; height: 20px;" type="checkbox"/> • Review of water billing records <input style="width: 50px; height: 20px;" type="checkbox"/> • Review of plumbing/building permits <input style="width: 50px; height: 20px; text-align: center;" type="checkbox" value="X"/> 	<ul style="list-style-type: none"> • Onsite inspections <input style="width: 50px; height: 20px; text-align: center;" type="checkbox" value="X"/> • Permit application requirements <input style="width: 50px; height: 20px;" type="checkbox"/> • Citizens involvement <input style="width: 50px; height: 20px;" type="checkbox"/> • Other (specify) <input style="width: 50px; height: 20px;" type="checkbox"/>
--	--

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	

Chapter 925.201 of Sewer Use Ordinance

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.).	IU Permit		
b. What is the maximum term of the control mechanism?	5 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	X		
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).			
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		X		680
b. Cadmium (Cd)			X		X		57
c. Chromium (Cr) (+6)			X		X		31
d. Copper (Cu)			X		X		95
e. Cyanide (CN)			X		X		92
f. Lead (Pb)			X		X		4900
g. Mercury (Hg)			X		X		12 ng/l
h. Molybdenum (Mo)							370000
i. Nickel (Ni)			X		X		2700
j. Selenium (Se)			X		X		142
k. Silver (Ag)			X		X		-
l. Zinc (Zn)			X		X		700
m. Other (specify): Total Cr			X		X		7100

H. COMPLIANCE MONITORING				
I. 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	Monthly	Annual	Annual	1/year
• Other SIUs	Monthly	Annual	Annual	1/year
c. Self-monitoring				
• CIUs	Semi-annual			2/year
• Other SIUs	Semi-annual			2/year
d. Reporting by IU				
• CIUs	Monthly			2/year
• Other SIUs	Monthly			2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			
1. Does the CA's program define "significant noncompliance"?	Yes	No	
X	X		
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	Yes	No	
X	X		
If no, provide the CA's definition of "significant noncompliance."			
2. Does the CA have an approved, written ERP? [403.8(f)(5)]	Yes	No	
X	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"/>	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 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	\$1000/day/violation
J. DATA MANAGEMENT/PUBLIC PARTICIPATION			
1. Does the approved program describe how the POTW will manage its files and data?	Yes	No	
		X	
Are files/records	<input type="checkbox"/>	computerized?	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	hard copy?	<input checked="" type="checkbox"/>
2. Are program records available to the public? Only annual report computerized.	Yes	No	
X	X		
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)] case by case	Yes	No	
X	X		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

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

2 lab techs part-time (Todd Jones and Bryan McKee) and operations manager – part time

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

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 type="checkbox"/>	e. Other (specify)	<input type="checkbox"/>
c. Industry surcharges	<input type="checkbox"/>		

L. ADDITIONAL INFORMATION

Two violations of wastewater treatment plant discharge during inspection period; fecal coliform on 9-16-09 and NH3-N on 9-1-10. Violations not attributed to industry.

The current NPDES permit requires the following:

Submit a modification of the existing approved program to incorporated streamlining guidance.

Submit a pollutant minimization program for silver.

Prepare, submit and implement a storm water pollution prevention plan to address each outfall that discharges to waters of the state that contains storm water associated with industrial activity.

GLS

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	1-12-11
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851