



Environmental
Protection Agency

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

February 14, 2011

Gerald Wolford, President
Board of Trustees
Earnhart Hill Regional Water & Sewer District
2030 Stoneridge Drive
P.O. Box 151
Circleville, OH 43113

Re: Industrial Pretreatment Compliance Inspection, January 11, 2011

Ladies and Gentlemen:

On January 11, 2011, I conducted a Pretreatment Compliance Inspection (PCI) of Earnhart Hill Regional Water & Sewer District's (EHRW&SD) Industrial Pretreatment Program (IPP). During the compliance inspection, I interviewed Brent Hayes, Pretreatment Coordinator, reviewed the pretreatment program files and conducted an exit interview with Mr. Hayes. The intent of the compliance inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the District'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 EHRW&SD's IPP has been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). There have not been any episodes of industrial users causing the district's WWTP to violate their NPDES permit.
2. EHRW&SD has submitted, albeit late, 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 program files were well organized.
3. No reportable non-compliance (RNC) was identified during the PCI. Industrial user self-monitoring and EHRW&SD's independent user sampling have been or will be conducted according to program requirements for the PCI time period.
4. During the compliance inspection, it was expressed by EHRW&SD that they may not want to continue administering the industrial pretreatment program. EHRW&SD stated that it takes an excessive amount of time to administer the program for the one industrial user.

There is one required action that is needed by EHRW&SD at this time. It is the following:

1. The one industrial user, Georgia-Pacific Corporation, has not been re-issued a new industrial user permit. The current industrial user permit expired on December 31, 2008. Please re-issue them an industrial user permit within six months from the date of this letter.

There are also several recommended actions by this Agency. These actions include:

1. It is recommended to be very specific when listing the sampling location in the industrial user permit.
2. It is recommended to list in the industrial user permit the reason that the industry was issued the permit, i.e., due to flow, loadings, etc...
3. It is recommended to include the pollutant, limit, outfall and sampling frequency in a single table on the same sheet in the industrial user permit.
4. The industrial user permit, Part 3. Pretreatment Survey Update, Paragraph C, Section 4, lists two dates in which to submit the survey. This is confusing and appears to be a typographical error. It is recommended to revise this section in the industrial user permit.
5. The industrial user sampling results for Georgia-Pacific Corporation has several column headings blackened-out. It is recommended to include these column headings, i.e., pollutant concentration in mg/l.
6. There is no definition for significant non-compliance in your sewer use ordinance or regulations. It is recommended to include this definition in the sewer use ordinance.

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. EHRW&SD 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 Scippo Sewer District Industrial Pretreatment Program Annual Report.
3. EHRW&SD 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.

Gerald Wolford, President
Board of Trustees
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Please acknowledge the receipt of this letter no later than February 28, 2011.

Ohio EPA recognizes the continuing commitment demonstrated by the EHRW&SD pretreatment and WWTP staff to implement state and federal pretreatment requirements. The required changes to the industrial user permits, if any, 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.

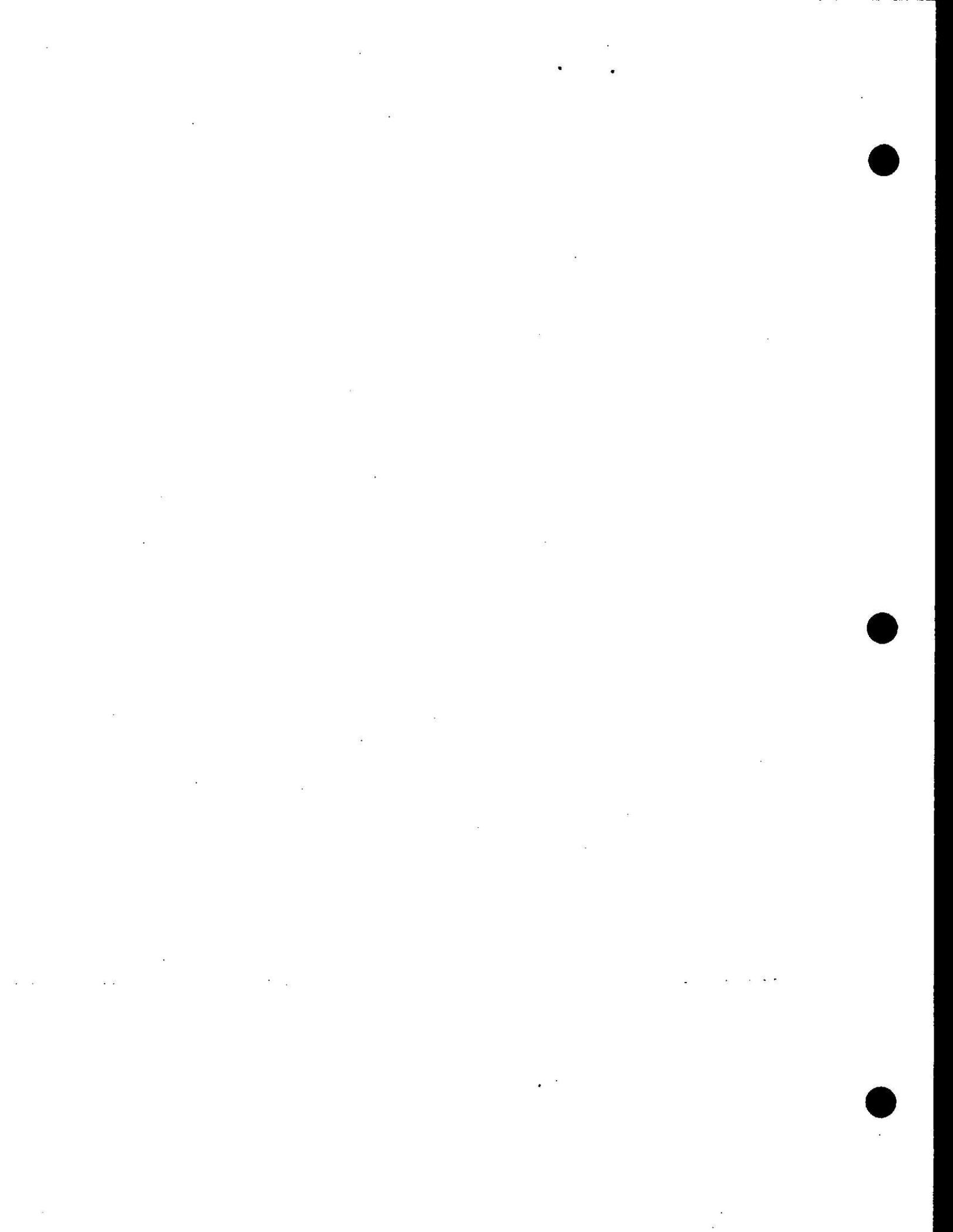
Sincerely,



Greg Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: EHRW&SD PCI Forms

c: Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO
Dennis Williams, Plant Manager, Earnhart Hill Regional Water & Sewer District
Brent Hayes, Plant Superintendent, Earnhart Hill Regional Water & Sewer District





Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME Earnhart Hill Regional Water & Sewer District, Treatment Plant #2		PERMIT NUMBER 4PQ00002*DD	FACILITY NUMBER OH0121371
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED January 11, 2011

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
**Earnhart Hill Regional Water & Sewer District Treatment Plant #2
27977 River View
Circleville, OH 43113**

MAILING ADDRESS OF FACILITY
**Brent Hayes, Earnhart Hill Regional Water & Sewer District
P.O. Box 151
Circleville, OH 43113**

CONTACT (NAME/TITLE/PHONE)
Brent Hayes, EHRW&SD, Pretreatment Coordinator; 740.474.3114

FACILITY EVALUATION

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

U	Pretreatment Compliance Inspection (PCI)		
	Report attached		
	Inspection period; Jan. 2009 through Dec. 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 1-24-11
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 2-3-11

Form 3560

WENDB AND RNC WORKSHEET PCI/Audit Checklist

FACILITY INFORMATION	
Name Earnhart Hill Regional Water & Sewer District Treatment Plant #2	
OH Number OH0121371	NPDES Number 4PQ00002*DD
Date of Inspection January 11, 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 Georgia-Pacific 2850 Owens Road Circleville, OH 43113	Type of industry Cardboard Box Manufacturer; SIC # 2653
---	---

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) 15,000	Average process flow (gpd) 4,400
	Industry visited during audit?	No <input checked="" type="checkbox"/>

COMPLIANCE STATUS

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

Explanation:

Compliance or period reviewed was from January 2009 to December 2010.

Comments:

Kevin Walters, EHS Manager; 740.477.3347 (250)

**Industrial SW discharge, they have a Storm Water No Exposure Certification .
Pollutants of concern – alkalis/caustic, dyes/inks, soaps/detergents, oils & boiler blowdown.
Raw materials – paperboard, corn starch, water-based inks, water-based adhesives, sodium hydroxide (50%),
borax, starch adhesive resin.**

**120 employees with 3 shifts/day, 7 days/week and 24 hours/day.
Batch discharge at twice a day, 6,000 gallon batches.
Sludge taken to Pinegrove landfill.
Pretreatment system has primary tanks, filtrate tanks and sludge holding tanks.**

Waste stream in gallons per month	Jan 2009 (gal/mn)	Dec 2009 (gal/mn)	Dec 2010 (gal/mn)
Sanitary	16,200	25,100	30,000 est.
Blow down / NCCW	513,782	502,500	499,010
Beckhart treated process	62,959	59,393	69,100
Total discharge	592,941	586,993	598,110

**Flow 001 – industrial process waste
Flow 002 – combined waste stream**

**Inspections by EHRW&SD conducted on 7-08-09, 12-02-09, 10-13-10 & 12-21-10.
Last IU permit application dated 12-21-07.
No current IU permit, previous permit expired on 12-31-08.**

SECTION I: IU IDENTIFICATION (Continued)

FILE ____ Industry name and address Type of industry

IU CLASSIFICATION BY CA:

CIU

Category(ies) _____

Non-categorical SIU

Non SIU

Average total flow (gpd)

Average process flow (gpd)

Industry visited during audit?

Yes

No

COMPLIANCE STATUS

SNC (period: 11-1-06 to 10-31-07)

Noncompliance/corrected

Noncompliance/continuing

In compliance

EXPLANATION:

Comments:

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.	
File 1	File	File	File	File		
SECTION I: IU FILE REVIEW					Reg. Cite	
A. ISSUANCE OF IU CONTROL MECHANISM						
X					1. Control mechanism application form	
1					2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
2					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					4. Control mechanism contents	403.8(f)(1)(iii)
X					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)
X					• Application of applicable categorical standards	403.8(f)(1)(ii)
X					-Classification by category/subcategory	
X					-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	
N/A					• Application of most stringent limit	403.8(f)(1)(ii)
Comments						
1 - The IU permit should state why industry was issued permit, i.e., due to flow, loading, etc...						
2 - The IU permit expired on 12-31-08 and not re-issued.						

File 1	File	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)
3					• Identification of pollutants to be monitored	
3					• Sampling frequency	
4					• 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)
X					k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)

Comments

3 – Pollutants, limits, frequency & outfall should be on same page and in same table.

4 – It is recommended that specific locations for the sampling locations and discharge points be listed in the IU permit.

File <u>1</u>	File	File	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	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	
N/A					• IU self-monitoring	
X					• CA compliance monitoring	
					b. Monitoring/reporting violations	
					• 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	
					• Notification	
					-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
					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)
D. OTHER						

Comments

GLS

SECTION I COMPLETED BY: Gregory L. Sanders	DATE: <i>1-24-11</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 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.)

EHRW&SD purchased the Scippo SD treatment plant in 2008 and renamed it EHRW&SD Treatment Plant #2. The name was recently changed to the River Road WWTP. Considering to discontinue administering the approved program due to the amount of staff hours needed to maintain program for one industry.

- 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.

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, 1 SIU.**

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

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

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]	Number	Percent
	1	100%
b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]		1
If any, explain.		

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.

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)]

By OWEA, Ohio EPA mailings, seminars & continued education credits.

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**

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 through December 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 %
0	0 %
0	0 %

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

Sample twice a year, in July and December; samples are split 1/yr for QA/QC.

2. Who performs your compliance sampling and analysis?

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

Sampling	Analysis
MASI	MASI

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 once per year**

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

Georgia-Pacific has two outfalls. Outfall 001 is industrial process waste and outfall 002 is a combined waste stream but no an issue with sampling.

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

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

1

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:

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

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

G. ENFORCEMENT

3. ERP implementation: [403.8(f)(5)] **Kept Scippo SD's ERP dated September 28, 1999. Not changed plan since taking over in 2008.**

a. Date of last modification: **Original pretreatment approval – September 28, 1999.**

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.

Not used.

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)? **Case by case**

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

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

Hard copy in pretreatment coordinator's office with backup copy in billing office.

Only annual report is computerized, but hard copy also kept.

b. How long are records maintained? [403.12(o)] **Eight years, from 2003.**

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

Posted in newspaper.

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].

1 (one)

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)?

Yes	No
	X

 If yes, what was found?

3. a. Have you implement any kind of public education program?

Yes	No
	X

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

Yes	No
	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)?

Yes	No
	X

 Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

The quarterly reports for the 4th quarter of 2009, 1st quarter of 2010 and 2nd quarter of 2010 were submitted late to the Agency. Quarterly reports are to be submitted by the 15th day of January, April, July and October for the previous quarter.

SECTION II COMPLETED BY: Gregory L. Sanders <i>GLS</i>	DATE: <i>1-24-11</i>
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: **EHRW&SD Treatment Plant #2**
2. Original pretreatment program submission approval date: **September 28, 1999**
3. Required frequency of reporting to Approval Authority: **Quarterly & Annual Reports**
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
EHRW&SD, Treatment Plant #2, aka, River Road WWTP	4PQ00002*DD	August 1, 2007	July 31, 2012

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

Yes	No

If yes, provide the following information.

POTW Name	Date of Plan Approval

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM] **May 1, 2002**

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

Date Approved	Name of Modification
July 14, 1995	PTI approved for WWTP
September 28, 1999	Original pretreatment program approval, SIU list & local limits developed
July 6, 2002	Limit modification

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: EHRW&SD Treatment Plant #2, aka, River Road WWTP		2. Location address: 27977 River Drive Circleville, OH 43113	
3. a. NPDES permit number 4PQ00002 / OH0121371	b. Expiration date July 31, 2012	4. Treatment plant wastewater flows	
		Design 0.15	MGD Actual 0.04 MGD
5. Sewer System	a. Separate % 100	b. Combined % N/A	c. Number of CSOs 0
6. a. Industrial contribution (MGD) 0.0044	b. Number of SIUs discharging to plant 1	c. Percent industrial flow to plant	
		% Non-domestic Flow	% Industrial Flow 11 %
7. Level of treatment	Type of Process(es)		
a. Primary	Bar screen, grit removal & oxidation ditch		
b. Secondary	Secondary clarification		
c. Tertiary	Post aeration & ultraviolet disinfection		
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.			
	Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)
a. Metals	-	2/yr	-
b. Organics	-	2/wk	-
c. Toxicity testing	-	-	1/yr
d. EP toxicity	-	-	-
e. TCLP	-	-	-
9. Effluent Discharge			
a. Receiving water name Scioto River	b. Receiving water classification WWH; Warm Water Habitat	c. Receiving water use AWS, IWS, PCR	
d. If effluent is discharged to any location other than the receiving water, indicate where. N/A			

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

C. TREATMENT PLANT INFORMATION (Continued)			
11. Did the CA submit results of whole effluent biological toxicity testing as part of its NPDES permit application(s)? [122.21(j)(1) and (2)]	N/A	Yes	No
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]	X		
b. Has there been a pattern of toxicity demonstrated?			
12. Indicate methods of sludge disposal.			
a. Land application	Quantity of sludge	dry tons/year	e. Public distribution
b. Incineration	Quantity of sludge	dry tons/year	f. Lagoon storage
c. Monofill	Quantity of sludge	dry tons/year	g. Other (specify)
d. MSW landfill	0	dry tons/year	No sludge hauled from plant last year, stored on-site.
D. LEGAL AUTHORITY			
1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). EHRW&SD regulations			
b. Date enacted/adopted: September 28, 1999	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)]			
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)] (1049.03)	Yes	No	
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		
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? **N/A**

Yes

No

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 b. Permit issuance c. Inspection and sampling d. Enforcement	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	e. Notification of IUs f. Receipt and review of IU reports g. Analysis of samples h. Other (specify)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <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)(1)]

Yes

No

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

c. How often is the IWS to be updated?

**Last time
- 1999**

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."

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?	IU permit expired 12-31-2008		
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)] If yes, described the discharge point(s) (including security procedures).	X		
G. APPLICATION OF STANDARDS			
1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]	Yes		No
			X
2. If there is more than one treatment plant, were local limits established specifically for each plant?	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		X	9,800
c. Chromium (Cr)		X		X		X	-
d. Copper (Cu)		X		X		X	-
e. Cyanide (CN)		X		X		X	0.092 mg/l
f. Lead (Pb)		X		X		X	1,200
g. Mercury (Hg)		X		X		X	0.012
h. Molybdenum (Mo)		X		X		X	-
i. Nickel (Ni)		X		X		X	2,600
j. Selenium (Se)		X		X		X	-
k. Silver (Ag)		X		X		X	-
l. Zinc (Zn)		X		X		X	680
m. Other (specify): Cr+6							31

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	2/yr	1/yr		1/year
• Other SIUs	2/yr	1/yr		1/year
b. Sampling by POTW				
• CIUs	2/yr			1/year
• Other SIUs	2/yr			1/year
c. Self-monitoring				
• CIUs				2/year
• Other SIUs	1/mn			2/year
d. Reporting by IU				
• CIUs	1/mn			2/year
• Other SIUs				2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT

1. Does the CA's program define "significant noncompliance"?

Yes	No
-----	----

	X
--	----------

If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]

If no, provide the CA's definition of "significant noncompliance." **No definition listed in ordinance.**

2. Does the CA have an approved, written ERP? [403.8(f)(5)] **Original, dated September 28, 1999, not revised since.**

Yes	No
-----	----

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

X

f. Administrative Order

X

b. Compliance schedule

X

g. Revocation of permit

c. Injunctive relief

--

h. Fines (maximum amount)

X

d. Imprisonment

--

• Civil **\$1000/day/violation**

e. Termination of service

X

• Criminal **\$1000/day/violation or 6 months in jail**

• 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
-----	----

No, not addressed in writing.

	X
--	----------

Are files/records

--

computerized?

X

hard copy?

X

2. Are program records available to the public? **Annual report computerized with hard copy.**

Yes	No
-----	----

X	
----------	--

3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)] **case by case**

	X
--	----------

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components: **One FTE used for entire program.**

	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	One (1)

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

The quarterly reports for the 4th quarter of 2009, 1st quarter of 2010 and 2nd quarter of 2010 were submitted late to the Agency. Quarterly reports are to be submitted by the 15th day of January, April, July and October for the previous quarter.

gll

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	<i>1-24-11</i>
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851



Environmental
Protection Agency

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

February 14, 2011

Gerald Wolford, President
Board of Trustees
Earnhart Hill Regional Water & Sewer District
2030 Stoneridge Drive
P.O. Box 151
Circleville, OH 43113

Re: Industrial Pretreatment Compliance Inspection, January 11, 2011

Ladies and Gentlemen:

On January 11, 2011, I conducted a Pretreatment Compliance Inspection (PCI) of Earnhart Hill Regional Water & Sewer District's (EHRW&SD) Industrial Pretreatment Program (IPP). During the compliance inspection, I interviewed Brent Hayes, Pretreatment Coordinator, reviewed the pretreatment program files and conducted an exit interview with Mr. Hayes. The intent of the compliance inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the District'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 EHRW&SD's IPP has been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). There have not been any episodes of industrial users causing the district's WWTP to violate their NPDES permit.
2. EHRW&SD has submitted, albeit late, 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 program files were well organized.
3. No reportable non-compliance (RNC) was identified during the PCI. Industrial user self-monitoring and EHRW&SD's independent user sampling have been or will be conducted according to program requirements for the PCI time period.
4. During the compliance inspection, it was expressed by EHRW&SD that they may not want to continue administering the industrial pretreatment program. EHRW&SD stated that it takes an excessive amount of time to administer the program for the one industrial user.

There is one required action that is needed by EHRW&SD at this time. It is the following:

1. The one industrial user, Georgia-Pacific Corporation, has not been re-issued a new industrial user permit. The current industrial user permit expired on December 31, 2008. Please re-issue them an industrial user permit within six months from the date of this letter.

There are also several recommended actions by this Agency. These actions include:

1. It is recommended to be very specific when listing the sampling location in the industrial user permit.
2. It is recommended to list in the industrial user permit the reason that the industry was issued the permit, i.e., due to flow, loadings, etc...
3. It is recommended to include the pollutant, limit, outfall and sampling frequency in a single table on the same sheet in the industrial user permit.
4. The industrial user permit, Part 3. Pretreatment Survey Update, Paragraph C, Section 4, lists two dates in which to submit the survey. This is confusing and appears to be a typographical error. It is recommended to revise this section in the industrial user permit.
5. The industrial user sampling results for Georgia-Pacific Corporation has several column headings blackened-out. It is recommended to include these column headings, i.e., pollutant concentration in mg/l.
6. There is no definition for significant non-compliance in your sewer use ordinance or regulations. It is recommended to include this definition in the sewer use ordinance.

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. EHRW&SD 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 Scippo Sewer District Industrial Pretreatment Program Annual Report.
3. EHRW&SD 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.

Gerald Wolford, President
Board of Trustees
Page 3 of 3

Please acknowledge the receipt of this letter no later than February 28, 2011.

Ohio EPA recognizes the continuing commitment demonstrated by the EHRW&SD pretreatment and WWTP staff to implement state and federal pretreatment requirements. The required changes to the industrial user permits, if any, 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.

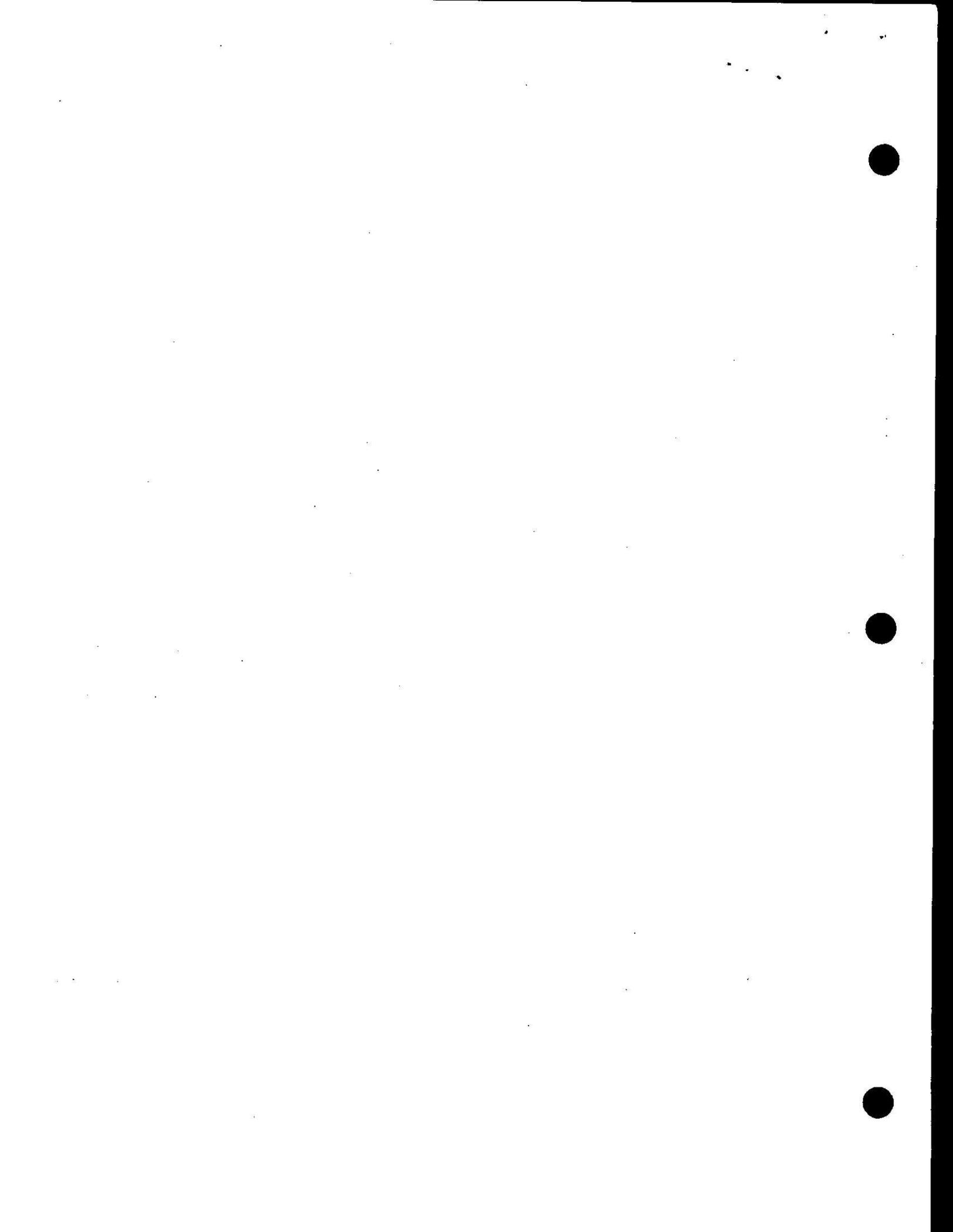
Sincerely,



Greg Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: EHRW&SD PCI Forms

c: Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO
Dennis Williams, Plant Manager, Earnhart Hill Regional Water & Sewer District
Brent Hayes, Plant Superintendent, Earnhart Hill Regional Water & Sewer District





Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME Earnhart Hill Regional Water & Sewer District, Treatment Plant #2		PERMIT NUMBER 4PQ00002*DD	FACILITY NUMBER OH0121371
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED January 11, 2011

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
**Earnhart Hill Regional Water & Sewer District Treatment Plant #2
27977 River View
Circleville, OH 43113**

MAILING ADDRESS OF FACILITY
**Brent Hayes, Earnhart Hill Regional Water & Sewer District
P.O. Box 151
Circleville, OH 43113**

CONTACT (NAME/TITLE/PHONE)
Brent Hayes, EHRW&SD, Pretreatment Coordinator; 740.474.3114

FACILITY EVALUATION

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

U	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>Gregory L. Sanders</i>	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 1-24-11
Signature of Reviewer Jeff Bohne, Supervisor <i>Jeff Bohne</i>	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 2-3-11

Form 3560

WENDB AND RNC WORKSHEET PCI/Audit Checklist

FACILITY INFORMATION

Name **Earnhart Hill Regional Water & Sewer District Treatment Plant #2**

OH Number **OH0121371**

NPDES Number **4PQ00002*DD**

Date of Inspection **January 11, 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 Georgia-Pacific 2850 Owens Road Circleville, OH 43113	Type of industry Cardboard Box Manufacturer; SIC # 2653
---	---

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) 15,000	Average process flow (gpd) 4,400
	Industry visited during audit?	No <input checked="" type="checkbox"/>

COMPLIANCE STATUS

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

Explanation:
Compliance or period reviewed was from January 2009 to December 2010.

Comments:
Kevin Walters, EHS Manager; 740.477.3347 (250)

Industrial SW discharge, they have a Storm Water No Exposure Certification .
Pollutants of concern – alkalis/caustic, dyes/inks, soaps/detergents, oils & boiler blowdown.
Raw materials – paperboard, corn starch, water-based inks, water-based adhesives, sodium hydroxide (50%), borax, starch adhesive resin.

120 employees with 3 shifts/day, 7 days/week and 24 hours/day.
Batch discharge at twice a day, 6,000 gallon batches.
Sludge taken to Pinegrove landfill.
Pretreatment system has primary tanks, filtrate tanks and sludge holding tanks.

Waste stream in gallons per month	Jan 2009 (gal/mn)	Dec 2009 (gal/mn)	Dec 2010 (gal/mn)
Sanitary	16,200	25,100	30,000 est.
Blow down / NCCW	513,782	502,500	499,010
Beckhart treated process	62,959	59,393	69,100
Total discharge	592,941	586,993	598,110

Flow 001 – industrial process waste
Flow 002 – combined waste stream

Inspections by EHRW&SD conducted on 7-08-09, 12-02-09, 10-13-10 & 12-21-10.
Last IU permit application dated 12-21-07.
No current IU permit, previous permit expired on 12-31-08.

SECTION I: IU IDENTIFICATION (Continued)

FILE ____ Industry name and address

Type of industry

IU CLASSIFICATION BY CA:

Average total flow (gpd)

Average process flow (gpd)

CIU

Category(ies) _____

Industry visited during audit?

Yes

No

Non-categorical SIU

Non SIU

COMPLIANCE STATUS

SNC (period: 11-1-06 to 10-31-07)

Noncompliance/corrected

Noncompliance/continuing

In compliance

EXPLANATION:

Comments;

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	File	File	File		
SECTION I: IU FILE REVIEW						
A. ISSUANCE OF IU CONTROL MECHANISM						
X					1. Control mechanism application form	
1					2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
2					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					4. Control mechanism contents	403.8(f)(1)(iii)
X					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)
X					• Application of applicable categorical standards	403.8(f)(1)(ii)
X					- Classification by category/subcategory	
X					- 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	
N/A					• Application of most stringent limit	403.8(f)(1)(ii)
Comments						
1 - The IU permit should state why industry was issued permit, i.e., due to flow, loading, etc...						
2 - The IU permit expired on 12-31-08 and not re-issued.						

File 1	File	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)
3					• Identification of pollutants to be monitored	
3					• Sampling frequency	
4					• 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)
X					k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)

Comments

3 – Pollutants, limits, frequency & outfall should be on same page and in same table.

4 – It is recommended that specific locations for the sampling locations and discharge points be listed in the IU permit.

File 1	File	File	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	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	
N/A					• IU self-monitoring	
X					• CA compliance monitoring	
					b. Monitoring/reporting violations	
					• 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	
					• Notification	
					-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)
D. OTHER						

Comments

GLS

SECTION I COMPLETED BY: Gregory L. Sanders	DATE: 1-24-11
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 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.)

EHRW&SD purchased the Scippo SD treatment plant in 2008 and renamed it EHRW&SD Treatment Plant #2. The name was recently changed to the River Road WWTP. Considering to discontinue administering the approved program due to the amount of staff hours needed to maintain program for one industry.

- 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.

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, 1 SIU.**

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

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

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

	Number	Percent
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	100%

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]	1
---	---

If any, explain.

	Yes	No
2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW?		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.

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)]

By OWEA, Ohio EPA mailings, seminars & continued education credits.

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**

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 through December 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 %
0	0 %
0	0 %

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

Sample twice a year, in July and December; samples are split 1/yr for QA/QC.

2. Who performs your compliance sampling and analysis?

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

Sampling	Analysis
MASI	MASI

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 once per year**

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

Georgia-Pacific has two outfalls. Outfall 001 is industrial process waste and outfall 002 is a combined waste stream but no an issue with sampling.

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

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

1

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:

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

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

G. ENFORCEMENT

3. ERP implementation: [403.8(f)(5)] **Kept Scippo SD's ERP dated September 28, 1999. Not changed plan since taking over in 2008.**

a. Date of last modification: **Original pretreatment approval – September 28, 1999.**

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.

Not used.

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)? **Case by case**

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

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

Hard copy in pretreatment coordinator's office with backup copy in billing office.

Only annual report is computerized, but hard copy also kept.

b. How long are records maintained? [403.12(o)] **Eight years, from 2003.**

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

Posted in newspaper.

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].

1 (one)

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**

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

The quarterly reports for the 4th quarter of 2009, 1st quarter of 2010 and 2nd quarter of 2010 were submitted late to the Agency. Quarterly reports are to be submitted by the 15th day of January, April, July and October for the previous quarter.

SECTION II COMPLETED BY: **Gregory L. Sanders**
 TITLE: **Environmental Specialist**

DATE: **1-24-11**
 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: **EHRW&SD Treatment Plant #2**
2. Original pretreatment program submission approval date: **September 28, 1999**
3. Required frequency of reporting to Approval Authority: **Quarterly & Annual Reports**
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
EHRW&SD, Treatment Plant #2, aka, River Road WWTP	4PQ00002*DD	August 1, 2007	July 31, 2012

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

If yes, provide the following information.

POTW Name	Date of Plan Approval

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM]	May 1, 2002
---	--------------------

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

Date Approved	Name of Modification
July 14, 1995	PTI approved for WWTP
September 28, 1999	Original pretreatment program approval, SIU list & local limits developed
July 6, 2002	Limit modification

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: EHRW&SD Treatment Plant #2, aka, River Road WWTP		2. Location address: 27977 River Drive Circleville, OH 43113	
3. a. NPDES permit number 4PQ00002 / OH0121371	b. Expiration date July 31, 2012	4. Treatment plant wastewater flows	
		Design 0.15	MGD Actual 0.04 MGD
5. Sewer System	a. Separate % 100	b. Combined % N/A	c. Number of CSOs 0
6. a. Industrial contribution (MGD) 0.0044	b. Number of SIUs discharging to plant 1	c. Percent industrial flow to plant	
		% Non-domestic Flow	% Industrial Flow 11 %
7. Level of treatment	Type of Process(es)		
a. Primary	Bar screen, grit removal & oxidation ditch		
b. Secondary	Secondary clarification		
c. Tertiary	Post aeration & ultraviolet disinfection		
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.			
	Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)
a. Metals	-	2/yr	-
b. Organics	-	2/wk	-
c. Toxicity testing	-	-	1/yr
d. EP toxicity	-	-	-
e. TCLP	-	-	-
9. Effluent Discharge			
a. Receiving water name Scioto River	b. Receiving water classification WWH; Warm Water Habitat	c. Receiving water use AWS, IWS, PCR	
d. If effluent is discharged to any location other than the receiving water, indicate where. N/A			

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	<input type="text"/>	dry tons/year	e. Public distribution	<input type="text"/>
b. Incineration	<input type="text"/>	dry tons/year	f. Lagoon storage	<input type="text"/>
c. Monofill	<input type="text"/>	dry tons/year	g. Other (specify)	<input type="text"/>
d. MSW landfill	0	dry tons/year	No sludge hauled from plant last year, stored on-site.	

D. LEGAL AUTHORITY

1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). **EHRW&SD regulations**

b. Date enacted/adopted: **September 28, 1999** 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? **None**

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? **N/A**

Yes	No

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

E. IU CHARACTERIZATION

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

Yes	No
	X

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

• Review of newspaper/phone book		• Onsite inspections	
• Review of water billing records		• Permit application requirements	
• Review of plumbing/building permits		• Citizens involvement	
		• Other (specify)	

c. How often is the IWS to be updated?

**Last time
- 1999**

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(1)(1)]

Yes	No
X	

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?	IU permit expired 12-31-2008		
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)] If yes, described the discharge point(s) (including security procedures).	X		
G. APPLICATION OF STANDARDS			
1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]	Yes	No	
		X	
2. If there is more than one treatment plant, were local limits established specifically for each plant?	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		X	9,800
c. Chromium (Cr)		X		X		X	-
d. Copper (Cu)		X		X		X	-
e. Cyanide (CN)		X		X		X	0.092 mg/l
f. Lead (Pb)		X		X		X	1,200
g. Mercury (Hg)		X		X		X	0.012
h. Molybdenum (Mo)		X		X		X	-
i. Nickel (Ni)		X		X		X	2,600
j. Selenium (Se)		X		X		X	-
k. Silver (Ag)		X		X		X	-
l. Zinc (Zn)		X		X		X	680
m. Other (specify): Cr+6							31

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	2/yr	1/yr		1/year
• Other SIUs	2/yr	1/yr		1/year
b. Sampling by POTW				
• CIUs	2/yr			1/year
• Other SIUs	2/yr			1/year
c. Self-monitoring				
• CIUs				2/year
• Other SIUs	1/mn			2/year
d. Reporting by IU				
• CIUs	1/mn			2/year
• Other SIUs				2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			
1. Does the CA's program define "significant noncompliance"?	Yes	No	
		X	
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]			
If no, provide the CA's definition of "significant noncompliance." No definition listed in ordinance.			
2. Does the CA have an approved, written ERP? [403.8(f)(5)] Original, dated September 28, 1999, not revised since.	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	X	f. Administrative Order	X
b. Compliance schedule	X	g. Revocation of permit	
c. Injunctive relief		h. Fines (maximum amount)	X
d. Imprisonment		• Civil	\$1000/day/violation
e. Termination of service	X	• Criminal	\$1000/day/violation or 6 months in jail
		• 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	
No, not addressed in writing.		X	
Are files/records	<input type="checkbox"/>	computerized?	X
		hard copy?	X
2. Are program records available to the public? Annual report computerized with hard copy.	X		
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)] case by case			X

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components: **One FTE used for entire program.**

	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	One (1)

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

The quarterly reports for the 4th quarter of 2009, 1st quarter of 2010 and 2nd quarter of 2010 were submitted late to the Agency. Quarterly reports are to be submitted by the 15th day of January, April, July and October for the previous quarter.

glll

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	<i>1-24-11</i>
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4DP0001020100428

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



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

April 28, 2010

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

**Re: National Fruit & Vegetable Technology, Fairfield County
Industrial Discharge Permit 4DP00010**

Dear Mr. Cashman:

Ohio Environmental Protection Agency staff has again sampled your non-contact cooling water outfall. Please be aware that during our inspection on April 21, 2010, we measured the temperature of the non-contact cooling water to be at 73.6 degrees F just prior to the discharge into Paw Paw Creek. We also measured the temperature of Paw Paw Creek to be at 53.9 degrees F. I have enclosed our test results. As such, your non-contact cooling water discharge does need to be permitted.

As stated previously, you must submit an application for the discharge of non-contact cooling water. You may obtain the application from the following weblink: http://www.epa.ohio.gov/dsw/permits/GP_NonContactCoolingWater.aspx.

As stated previously, please submit a detailed schematic of all sanitary and storm lines in the building, under the building and on the plant property. All lines shall be labeled. Please also include various production lines such as the brown and white water process lines. We have received your recent correspondence and attached pictures and applaud your efforts in preventing pollutants from discharging to waters of the state.

Please submit a very detailed description of your non-contact cooling water, e.g., what the water cools, where/how the water is obtained, any additives added and how it is discharged.

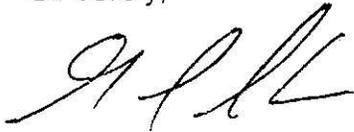
Please be aware that an inspection will be conducted within the next 60 days to determine compliance with your indirect discharge permit.

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

Rick Cashman
National Fruit & Vegetable Technology
Page -2-

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please submit the above action item within 14 days from the date of this letter. If you need additional information or assistance, please 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

c: Dennis Rose, Utilities Director, Village of Baltimore
Ryan Laake, Ohio EPA/DSW/CO

GLS/nsm 21April2010sampling. National Fruit & Vegetable.wpd

National Fruit & Vegetable Technology
Wednesday, April 21, 2010

Field Readings/Comments (YSI 556)

SITE (TIME)	D.O. (mg/l)	TEMP. (°C)	COND. (µm/cm)	pH (su)	OBSERVATIONS
NFVTC STORM W (11:44 am)	12.77*	12.18	814	7.69	Storm Water – West Outfall. Very Slight Flow. A little turbid.
NFVTC STORM E (11:40 am)	8.46	23.11	1270	8.46	Storm Water – East Outfall. Strong Flow. Clear. No Odor.
Pawpaw Creek Upstream NFVTC Storm E (1:43 pm)	10.63	14.53	737	8.27	Clear. Normal Flow.

*Very slight flow in ditch may have altered D.O. reading.

Weather: Warm (68-72 °F). Clear. Dry. No measurable rainfall within last 72 hours.

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4DP0001020100204

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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www.epa.state.oh.us

MAILING ADDRESS:

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

February 4, 2010

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

**Re: Response to October 15, 2009 submittal
National Fruit & Vegetable Technology, Fairfield County
Industrial Discharge Permit 4DP00010**

Dear Mr. Cashman:

I reviewed your correspondence dated October 15, 2009. This correspondence states that you are requesting an exemption to a non-contact cooling water discharge permit. You also state that you meet an exemption of not having the cooling water rise ten degrees. You state that you pump the well water to the surface at 56.6 degrees fahrenheit (F) and that it does not reach 65 degrees F at its discharge to Paw Paw Creek. Please be aware that during our inspection on April 27, 2009, we measured flow of the non-contact cooling water to be at 83 degrees F at the storm water manhole just outside of your boiler building and at 72 degrees F just prior to the discharge into Paw Paw Creek. I have enclosed our test results. As such, your non-contact cooling water does rise at least ten degrees F.

As stated previously, you must submit an application for the discharge of non-contact cooling water. You may obtain the application from the following weblink: http://www.epa.ohio.gov/dsw/permits/GP_NonContactCoolingWater.aspx.

As stated previously, please submit a detailed schematic of all sanitary and storm lines in the building, under the building and on the plant property. All lines shall be labeled. Please also include various production lines such as the brown and white water process lines.

Please submit a very detailed description of your non-contact cooling water, e.g., what the water cools, where/how the water is obtained, any additives added and how it is discharged.

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

Rick Cashman
National Fruit & Vegetable Technology
Page -3-

Please be aware that an inspection will be conducted within the next 30 days to determine compliance with your indirect discharge permit.

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please submit the above action item within 14 days from the date of this letter. If you need additional information or assistance, please 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

c: Dennis Rose, Utilities Director, Village of Baltimore
Ryan Laake, Ohio EPA/DSW/CO

GLS/nsm 1February2010Cov. Ltr. National Fruit & Vegetable.wpd

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found

4DP0001020091214

4DP0001020091214

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

Central District Office

TELE: (614) 728-3776 FAX: (614) 728-3898
www.epa.state.oh.us

MAILING ADDRESS:

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

December 14, 2009

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

Re: Facility Pretreatment Reconnaissance Inspection (4DP00010)

Dear Mr. Cashman:

I conducted reconnaissance inspections on December 3, 2009. The purpose of the site visits were to evaluate the discharges to the east and west storm water outfalls. The following were noted during the inspections:

1. The west storm water outfall had water standing in the ditch and it appeared gray in color. The gray color usually represents sewage in the discharge.
2. The east storm water outfall had a little flow and there was no rain the previous two days prior to the December 3, 2009, inspection. It appears the flow in the east storm water outfall is from non-contact cooling water. Please submit an application for the discharge of non-contact cooling water. You may obtain the application from the following weblink: http://epa.ohio.gov/dsw/permits/GP_NonContactCoolingWater.aspx
3. I am currently reviewing your submittal dated October 15, 2009. I will address this review under separate cover letter.
4. I have noted that you have submitted a request to land apply potato peels to Phil Farnlarcher in the Division of Solid and Infectious Waste Management in Central District Office at the Ohio Environmental Protection Agency.

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please submit the above action items within 14 days from the date of this letter.

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

Rick Cashman
National Fruit & Vegetable Technology
Page -2-

If you need additional information or assistance, please 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

c: Dennis Rose, Utilities Director, Village of Baltimore
Ryan Laake, Ohio EPA/DSW/CO

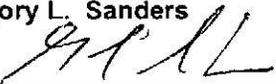
GLS/nsm 3December2009Cov. Ltr. National Fruit & Vegetable.wpd

State of Ohio Environmental Protection Agency

NPDES PERMIT NUMBER OHP000110	FACILITY PERMIT NUMBER 4DP00010*CP	DATE CONDUCTED December 3, 2009
INSPECTION TYPE R	INSPECTOR S	FACILITY TYPE 2
		TIME IN TIME OUT 3:40 pm 4:00 pm

GENERAL INFORMATION	
Name and Location of Facility National Fruit & Vegetable Technology Corporation 210 Water Street Baltimore, OH 43105	POTW Receiving Discharge Village of Baltimore
Mailing Address of Facility same	Categorical Standard(s) or other Classification Non-Categorical Significant User
Contact (Name/Title/Phone) Rick Cashman, CEO 740.862.6300	Other Notes: Recon inspection to check water quality in east & west storm water outfalls.

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
NE	General Facility Operation	U	Pretreatment System - inspected east & west storm water outfalls. No permit for non-contact cooling water discharge. West outfall flowing full and grayish in color.
NE	Permit Compliance (Effluent Limitations)	NE	Self-Monitoring and Reporting

Name and Signature of Inspector	Agency / Office / Telephone	Date
Gregory L. Sanders 	OEP/DSW/CDO/(614)728-3851	December 9, 2009
Signature of Reviewer	Agency / Office	Date
Jeff Bohne, Supervisor; Water Quality 	OEP/DSW/CDO/(614)728-3841	12-18-09

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4DP0001020090902

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

Central District Office

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

MAILING ADDRESS:

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

September 2, 2009

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

Re: Facility Pretreatment Reconnaissance Inspection (4DP00010)

Dear Mr. Cashman:

I conducted reconnaissance inspections on August 5, 21 and 26, 2009. The purpose of the site visits were to evaluate the discharges to the east and west storm water outfalls. The following were noted during the inspections:

1. The west storm water outfall had water standing in the ditch, however, it appeared clear with no suspended solids.
2. The east storm water outfall had a lot of flow on August 26, 2009. There was no rain the previous two days prior to the August 26, 2009, inspection. It appears the flow in the east storm water outfall is from non-contact cooling water. Please submit an application for the discharge of non-contact cooling water. You may obtain the application from the following weblink: http://epa.ohio.gov/dsw/permits/GP_NonContactCoolingWater.aspx
3. As stated in previous correspondence, please submit a detailed schematic of all sanitary and storm lines in the building, under the building and on the plant property. All lines shall be labeled. Please also include various production lines such as the brown and white water process lines.
4. You must submit a request to land apply potato peels to Phil Farnlarcher in the Division of Solid and Infectious Waste Management in Central District Office at the Ohio Environmental Protection Agency. You must obtain approval prior to further land application of potato peels.

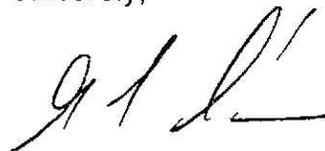
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Rick Cashman
National Fruit & Vegetable Technology
Page -2-

5. You must submit a land application management plan for the land application of starch filter waste. This management plan must be submitted to Jacob Howdyshell in the Division of Surface Water in Central Office at the Ohio Environmental Protection Agency. You must obtain approval of this management plan prior to further land application of starch filter waste.
6. As stated previously, the storage of the chemical drums must be enclosed inside of a dike or other containment facility. There are sanitary sewer floor drains within close proximity of the drum storage area. If a drum leaked or was spilled, it could cause interference with the Village's wastewater treatment plant. You may also permanently plug the floor drains.

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please submit the above action items within 14 days from the date of this letter. If you need additional information or assistance, please 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

c: Dennis Rose, Utilities Director, Village of Baltimore
Ryan Laake, Ohio EPA/DSW/CO

OhioEPA

PRETREATMENT INSPECTION REPORT

State of Ohio Environmental Protection Agency

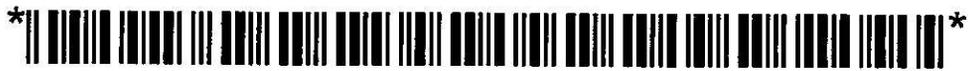
NPDES PERMIT NUMBER OHP000110	FACILITY PERMIT NUMBER 4DP00010*CP	DATE CONDUCTED August 26, 2009
INSPECTION TYPE R	INSPECTOR S	FACILITY TYPE 1
		TIME IN 8 am
		TIME OUT 8:45 am

GENERAL INFORMATION	
Name and Location of Facility National Fruit & Vegetable Technology Corporation 210 Water Street Baltimore, OH 43105	POTW Receiving Discharge Village of Baltimore
Mailing Address of Facility same	Categorical Standard(s) or other Classification Non-Categorical Significant User
Contact (Name/Title/Phone) Rick Cashman, CEO 740.862.6300	Other Notes: Follow-up to previous inspections regarding discharges to storm water outfalls.

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
NE	General Facility Operation	M	Pretreatment System - inspected east & west storm water outfalls. No permit for non-contact cooling water discharge.
NE	Permit Compliance (Effluent Limitations) -	NE	Self-Monitoring and Reporting

Name and Signature of Inspector	Agency / Office / Telephone	Date
Greg Sanders <i>gls</i>	OEPA/DSW/CDO/(614)728-3851	8-31-2009
Signature of Reviewer	Agency / Office	Date
Jeff Bohne, Supervisor, Water Quality <i>J Bohne</i>	OEPA/DSW/CDO/(614)728-3841	9-14-09

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4DP0001020090729

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



FILE COPY

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) 726-3778 FAX: (614) 726-3898
www.epa.state.oh.us

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

July 29, 2009

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

Re: Facility Pretreatment Reconnaissance Inspection (4DP00010)

Dear Mr. Cashman:

A site inspection was conducted on June 17, 2009, to inspect the east and west storm drains discharging to Paw Paw Creek. During the site inspection, there was no discharge from the east outfall and the effluent in the west outfall was clear. A copy of the reconnaissance inspection report is attached.

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure compliance with pretreatment requirements and the indirect discharge permit. If you would like to discuss this report, please feel free to contact me by phone at (614) 728-3851 or by e-mail at greg.sanders@epa.state.oh.us.

Sincerely,

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

Enclosure

c: Marsha Hall, Village of Baltimore
Jan Rice, Ohio EPA/DSW/CDO
Ryan Laake, Ohio EPA/DSW/CO

GLS/nsm 17June2009Cov. Ltr. National Fruit & Vegetable.wpd

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

OhioEPA

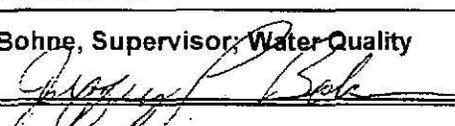
State of Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

NPDES PERMIT NUMBER OHP000110		FACILITY PERMIT NUMBER 4DP00010*CP		DATE CONDUCTED 6-17-2009	
INSPECTION TYPE R	INSPECTOR S	FACILITY TYPE 2	TIME IN 6:45 am	TIME OUT 7:00 am	

GENERAL INFORMATION	
Name and Location of Facility National Fruit & Vegetable Technology Corporation 210 Water Street Baltimore, OH 43105	POTW Receiving Discharge Village of Baltimore
Mailing Address of Facility same	Categorical Standard(s) or other Classification Non-Categorical Significant User
Contact (Name/Title/Phone) Rick Cashman, CEO 740.862.6300	Other Notes: Inspected east and west storm water outfalls. No discharge from east outfall. Clear in west outfall.

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
NE	General Facility Operation	S	Pretreatment System - inspected storm water collection system discharging to Paw Paw Creek.
NE	Permit Compliance (Effluent Limitations)-	NE	Self-Monitoring and Reporting

Name and Signature of Inspector Greg Sanders 	Agency / Office / Telephone OEPA/DSW/CDO/(614)728-3851	Date 6-23-2009
Signature of Reviewer 	Agency / Office OEPA/DSW/CDO/(614)728-3841	Date 7/27/09

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4DP0001020090401

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



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

Certified Mail #91 7108 2133 3932 4449 9840

April 1, 2009

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

**Re: Notice of Violation
Facility Pretreatment Reconnaissance Inspection (4DP00010)**

Dear Mr. Cashman:

During the inspection at National Fruit and Vegetable Technology (NF&V) on March 16, 2009, it was noted that the storm water sewer serving your facility was discharging untreated wastewater to Paw Paw Creek. Further inspection with Ohio EPA staff, yourself and Mitch Adams of NF&V uncovered a manhole which had a clogged sanitary sewer line. The clogged sanitary sewer line was within ten feet of a storm water line which was discharging untreated wastewater. As stated in previous correspondence, the sewerage must immediately be pumped from the clogged sanitary sewer line by an approved septic hauler. The reason for the clogged sanitary sewer must be evaluated and corrected. Please conduct any needed maintenance to the sanitary sewer collection system and make repairs to prevent future "cross-connections" to the storm sewer collection system. Discharge of untreated sewerage to waters of the state without a National Pollutant Discharge Elimination System Permit is a violation of state and federal laws. Please submit pumping records that show that the sanitary sewer line was pumped and the line was repaired.

Also, as requested previously, please address the comments from previous site visits. **The following actions are required by National Fruit & Vegetable Technology:**

1. Please submit a detailed schematic of all sanitary and storm lines in the building, under the building and on the plant property. All lines shall be labeled. Please also include various production lines such as the brown and white water process lines.
2. You must submit a land application management plan for the land application of starch filter waste. This management plan must be submitted to Jacob Howdysshell in the Division of Surface Water in Central Office at the Ohio Environmental Protection Agency. You must obtain approval of this management plan prior to further land application of starch filter waste.

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

3. You must submit a request to land apply potato peels to Phil Famlarcher in the Division of Solid and Infectious Waste Management in Central District Office at the Ohio Environmental Protection Agency. You must obtain approval prior to further land application of potato peels.
4. The storage of the chemical drums must be enclosed inside of a dike or other containment facility. There are sanitary sewer floor drains within close proximity of the drum storage area. If a drum leaked or was spilled, it could cause interference with the Village's wastewater treatment plant. You may also permanently plug the floor drains.

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure compliance with pretreatment requirements and the indirect discharge permit. Please submit the above action items within 10 days from the date of this letter. If you need additional information or assistance, please 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

Re: Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO
Marsha Hall, Village of Baltimore

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4DP0001020110419

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



Environmental
Protection Agency

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

Certified Mail #91 7108 2133 3932 4449 1325

April 19, 2011

Rick Cashman
National Fruit & Vegetable Technology
210 Water Street
Baltimore, OH 43105

**Re: Facility Pretreatment Reconnaissance Inspection (4DP00010)
National Fruit & Vegetable Technology Corporation**

Dear Mr. Cashman:

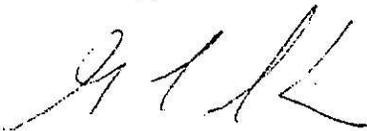
The Agency sent you a letter in November 2010 requesting several actions to be taken to be in compliance with your Ohio EPA indirect discharge permit. Illicit discharge complaints prompted several inspections over the past several years. As of this date, we have not received any correspondence from you addressing our November 2010 letter. The following actions must be addressed within 30 days from the date of this letter.

- Monitoring reports need to be submitted per your current indirect discharge permit.
- There should be no discharge of wastewater (industrial or domestic sanitary) to your private sanitary lateral until the "cross-connection" between the sanitary sewer and storm sewer is discovered and repaired. This may involve pumping directly to the metering manhole or pumping to a "frac" tank and having it hauled off-site. Please be aware that continuing to discharge to your failing sanitary sewer lateral could be considered a potential criminal case as it is known that there is a "cross-connection" between the sanitary sewer line and waters of the state.
- Please continue and document efforts to replace old floor drains in the facility.
- The ownership and maintenance responsibility of the storm sewer lines serving your facility need to be discussed with the Village of Baltimore. The Village of Baltimore has stated that your private sanitary sewer lateral ends at the yellow manhole upstream of the metering pit.

Rick Cashman
National Fruit & Vegetable Technology
Page -2-

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please provide this office with a written response and schedule to address the issues listed in this report within 30 days from the date of this letter. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: greg.sanders@epa.state.oh.us.

Sincerely,



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

Enclosure

c: Marsha Hall, Village of Baltimore

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4PD0001620071203

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

Central District Office

STREET 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

MAILING ADDRESS:

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

December 3, 2007

Mr. Ron Gottke
Flying J Travel Plaza
10480 Baltimore Road
Millersport, OH 43046

Re: Facility Pretreatment Inspection

Dear Mr. Gottke:

Thank you for taking time to meet with me on Wednesday, October 17, 2007. The purpose of the site visit was to evaluate your compliance with the Ohio EPA indirect discharge permit conditions and pretreatment requirements. During the site visit we also reviewed and discussed industrial storm water items.

Attached you will find my report and observations from the site visit. The following items were identified.

1. The recirculating sand filters appeared to be ponding in two of the six zones. Flying J has used an air compressor to "backwash" and aerate the filter due to grease clogging the bottom layer of the filter which was inadvertently done during the first year of use. The air compressor is normally used about four times per week to yield lower BOD values. The air compressor was not in operation at the time of inspection and is in need of repair.
2. The effluent from the sand filter discharges to a lift station is located on the Flying J property. The lift station pumps the effluent to a manhole located along S.R. 158. The lift station was not operating properly during the site inspection. The lift station did not operate on the automatic mode and had to be manually started and stopped.
3. The oil/water separator consisting of three tanks is located near the front of the property, on the truck side of the plaza, and the effluent discharges directly to the Village of Kirkersville manhole along S.R. 158. The oil/water separator is pumped twice a year by January Transport and now has a fence constructed around the unit.
4. The wash sink in the rear of the building is permanently plugged.

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

5. There were empty containers of gasoline stored on the ground around the compressor.
6. Drums stored in the rear of the building did not have secondary containment.
7. A review of the October 1, 2007, sample results from the lift station for oil & grease were elevated.

The following actions are required by Flying J Travel Plaza - Kirkersville.

1. Waste oil drums in rear of facility need to be covered and have double containment to prevent spillage or leaking into the storm water system.
2. The lift station should be repaired to be fully functional in the automatic mode.
3. The compressor should be repaired and put back on-line to prevent ponding of the recirculating sand filter and to lower BOD values.
4. Remove the empty gas containers from the ground near the compressor.
5. Please evaluate the system to determine the reason for the elevated oil & grease sample result. It is requested to meet a 100 mg/l for oil & grease.

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please 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

c: Julia Zhang, Ohio EPA, DSW/CO
Tim Shumaker, TCCI Laboratories, Inc.

OhioEPA

State of Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

NPDES PERMIT NUMBER OHP000227		FACILITY PERMIT NUMBER 4DP00016*AP		DATE CONDUCTED 10/17/2007	
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 1	TIME IN 1:05 am	TIME OUT 1:45 am	

GENERAL INFORMATION	
Name and Location of Facility Flying J Travel Plaza - Kirkersville 10480 Baltimore Road Kirkersville, OH 43046	POTW Receiving Discharge Village of Kirkersville
Mailing Address of Facility same	Categorical Standard(s) or other Classification Gas Station and Travel Plaza
Contact (Name/Title/Phone) Ron Gottke Facility Manager 740.964.9601	Other Notes: TCCI contracts to operate & maintain plant

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
S	General Facility Operation Facility well-maintained at time of site visit.	M	Pretreatment System Compressor was not working at time of inspection and lift station was not operating properly in automatic mode. Air header caps were being installed on the sand filter. Sand filters were ponding in areas.
S	Permit Compliance (Effluent Limitations) NPDES permit just issued January 24, 2007	S	Self-Monitoring and Reporting No violations were reported at time of inspection.

Name and Signature of Inspector	Agency / Office / Telephone	Date
Gregory Sanders <i>G.S.</i>	OEPA/DSW/CDO/(614)728-3851	10-25-07
Signature of Reviewer	Agency / Office	Date
Jeff Bohne, Supervisor <i>J. Boh</i>	OEPA/DSW/CDO/(614)728-3841	11-26-07

INDUSTRIAL USER INSPECTION CHECKLIST

Flying J Truck Plaza - Kirkersville

Wednesday, October 17, 2007

1.0 COMPLIANCE

* Does the facility have an effective permit? **Yes, Indirect Discharge Permit (IDP) #4DP00016*AP. Effective March 1, 2007 and expires February 29, 2012.**

* Since the last inspection, is the facility in compliance with its permit limits? If no, explain:

* Is the facility in compliance with all other requirements?

Sampling procedure	Planning to have redundant pH probes by mid-year.	<u>Y</u> / <u>N</u> / <u>NA</u>
Reporting (late reporting, failure to report, etc.)		<u>Y</u> / <u>N</u> / <u>NA</u>
Compliance Schedule		<u>Y</u> / <u>N</u> / <u>NA</u>
Submitted BMR		<u>Y</u> / <u>N</u> / <u>NA</u>
Any other requirement		<u>Y</u> / <u>N</u> / <u>NA</u>

If any of the above five answers were no, explain:

* Was the facility required to perform any action as a result the previous inspection?
If yes, has the facility completed those action(s)

Y / N

If no, explain:

2.0 FACILITY OPERATIONAL CHARACTERISTICS

General Facility Description and Operations:

Number of Employees: 50 in restaurant & 35 in gas station Shifts/Day: 3 Production Days/Year: **7 days week typical**

Any production changes since the last inspection? No significant process changes in plant operation. Y / N
If Yes, explain:

Any expansion or production increase expected within the next year?
If Yes, explain:

Y / N

3.0 PROCESS AND WASTEWATER INFORMATION

Provide a process schematic (including relevant dry processes): **See File for IDP and PTI applications.**

* List all processes generating wastewater as well as their previous (those that the permit limits are based on) and current wastewater flows and production rates. **See Also IDP and PTI Applications.**

PROCESS	WASTEWATER FLOW (gpd)		PRODUCTION DATA	
	AVG	MAX	permit	current
1.				
2.				
3.				
4.				
5.)				
6.				
7.				
8.				
9.				
TOTAL				

Are all the flows discharged to the POTW?
If no, explain:

Y / N

Are all the flows present at the sampling location?
If no, which flows are not present:

Y / N

How does the current production rate compare with the production rate used to develop the facilities permit limits?

4.0 WASTEWATER TREATMENT

* Describe the wastewater treatment system:

* Was a PTI issued for the treatment system?

/ N

What is the treatment mode of operation?

Batch / Continuous / Combination

If batch, list frequency and duration:

Is there a full-time wastewater treatment operator?

/ N / NA

If no, how often is treatment system checked?

Is there an operations and maintenance manual?

/ N / NA

Is an inventory of critical spare parts maintained?

/ N / NA

Are there any bypasses in the system?

Y / N / NA

If yes, location:

If yes, have bypasses occurred since last inspection?

Y / N

If yes, was the POTW notified?

Y / N

Method of sludge disposal:

Name of sludge hauler:

Frequency and amount of disposal:

Is any sludge generated subject to RCRA regulations? -

/ N

5.0 TOXICS MANAGEMENT

Are any TTOs used in the facility?

/ N

If yes, identify TTOs: gas & oil

Does the facility have a current SPCC Plan? **Yes, not evaluated, but discussed. Used for 25 gallons or more of gas/diesel spill. Smaller spills treated by staff under normal protocol.**

Does the facility have a current TOMP? .

Y / N / NA

If yes, is it being implemented?

Does the facility need a plan to control slug loads?

Y / N

* If yes, does the facility have a plan?

Y / N

If yes, is it being implemented?

Y / N

Identify any potential spill areas:

6.0 SELF-MONITORING

* Sampling location described in their permit. **Lift station on-site.**

Is the facility sampling at the location described in their permit? Y / N / NA
If no, described the sampling location:

Is the sampling location representative? Y / N
If no, indicate a representative location:

Are all connections to the sewer monitored? Y / N
If yes, explain:

Is the flow measured or estimated? M / E
If measured, when was flow meter last calibrated?

Is pH measured with a pH meter? Y / N
If yes, how often is the meter calibrated?

Is pH continuously monitored? Y / N

Does the facility collect its own samples? Y / N
If no, who collects the samples?

Does the facility follow appropriate sampling procedures?

* Monitoring frequencies? Y / N

* Sample collection (grab=pH, CN, VOC) Y / N

Flow proportioned samples? Y / N

Proper preservation techniques? Y / N

Sample holding times? Y / N

Chain-of-custody forms? Y / N

Are samples analyzed according to 40 CFR 136? Y / N

Laboratory conducting analyses:

7.0 OTHER OBSERVATIONS/NOTES

The recirculating sand filters appeared to be ponding in 2 of the 6 zones. Flying J has used an air compressor to "backwash" and aerate the filter due to grease clogging the bottom layer of the filter which was inadvertently done during the first year of use. The air compressor is normally used about 4 times per week to yield lower BOD values. The air compressor was not in operation at time of inspection and was in need of repair. The effluent from the filter discharges to a lift station located on the Flying J property. The lift station pumps the effluent to a manhole located along S.R. 158. The lift station was not operating properly during the site inspection. The lift station did not operate on the automatic mode and had to be manually started and stopped.

The oil/water separator located near the front of the property, on the truck side of the plaza, consists of three tanks and the effluent discharges directly to the Village of Kirkersville manhole along S.R. 158. The oil/water separator is pumped twice a year by January Transport. The oil/water separator now has a fence constructed around the unit.

The wash sink in the rear of the building is permanently plugged.

There were empty containers of gasoline stored on the ground around the compressor.

Drums stored in the rear of the building did not have secondary containment.

A review of the October 1, 2007, sample results from the lift station for oil & grease were elevated.

8.0 REQUIRED FOLLOW-UP ACTIONS

Waste oil drums in rear of facility need to be covered and have double containment to prevent spillage or leaking into storm water system.

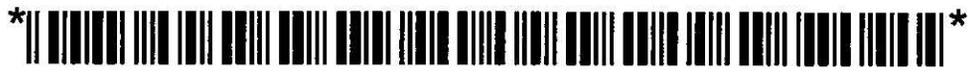
The lift station should be repaired to be fully functional in the automatic mode.

The compressor should be repaired or put back on-line to prevent ponding of the recirculating sand filter and to lower BOD values.

Remove the empty gas containers from the ground near the compressor.

Please evaluate the system to determine the reason for the elevated oil & grease sample result. It is requested to meet a 100 mg/l for oil & grease.

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4PD0001620090729

- Type the correct permit number and date in both lines
- Highlight the upper line
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State of Ohio Environmental Protection Agency

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Central District Office

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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

July 29, 2009

Steve Leister
Flying J Travel Plaza
10480 Baltimore Road
Millersport, OH 43046

Re: Facility Pretreatment Inspection

Dear Mr. Leister:

Thank you for taking time to meet with me on Tuesday, March 24, 2009. Your knowledge of the facility and pretreatment system, as well as, your helpfulness expedited the inspection process. The purpose of the site visit was to evaluate your compliance with the Ohio EPA indirect discharge permit conditions and pretreatment requirements. During the site visit we also reviewed and discussed industrial storm water items.

Attached you will find my report and observations from the site visit. The following items were identified.

1. The recirculating sand filters were not ponding and appeared to be properly operating during the inspection. Compressed air has not been used for several months but the operator may start using air again for two hours per day to help "backwash" and aerate the sand filter.
2. The effluent from the filter discharges to a lift station located on the Flying J property. The lift station pumps the effluent to a manhole located along S.R. 158. The lift station was currently being fitted with new controls in order to be able to operate in automatic mode. The lift station currently did not operate on the automatic mode and had to be manually started and stopped.
3. The oil/water separator located near the front of the property, on the truck side of the plaza, consists of three tanks and the effluent discharges directly to the Village of Kirkersville manhole along S.R. 158. The oil/water separator is pumped twice a year by Tennessee General. The oil/water separator was last pumped on March 23, 2009.
4. The wash sink in the rear of the building had the plug removed and was now back in use. The sink had a bottle of degreaser in it and a full pot of grease next to it. The facility manager was informed that no grease should be dumped into the sink, nor should the greasy pots be cleaned in the sink.

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

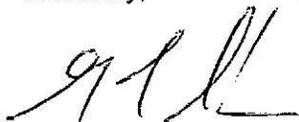
5. There were full containers of gasoline stored on the ground near the compressor and sand filters. It was recommended to store the gas containers in secondary containment to prevent accident spilling into the sand filters.
6. Drums of methanol that were stored in the rear of the building did not have secondary containment.
7. A review of operating data from November of 2007, show that the facility remained in compliance.

The following actions are required by Flying J Travel Plaza - Kirkersville.

1. The lift station should be repaired to be fully functional in the automatic mode.
2. Remove the gas containers from the ground near the compressor or store in secondary containment.
3. Inform restaurant staff that grease should not be dumped into sinks and greasy pots should not be washed in the outside sink in the rear of the building. Excessive grease getting into the pretreatment system could cause the sand filters to clog.
4. Drums that are full in rear of facility need to be covered and have double containment to prevent spillage or leaking into storm water system.

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please 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

c: Ryan Laake, Ohio EPA, DSW/CO
Tim Shumaker, TCCI Laboratories, Inc.
Gayle Smith, P.E., Flying J, Salt Lake UT

OhioEPA

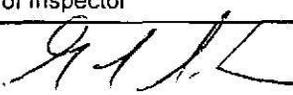
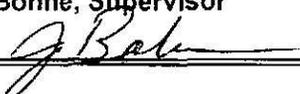
State of Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

NPDES PERMIT NUMBER OHP000227		FACILITY PERMIT NUMBER 4DP00016*AP		DATE CONDUCTED 3/24/2009	
INSPECTION TYPE R	INSPECTOR S	FACILITY TYPE 2	TIME IN 7:30 am	TIME OUT 8:30 am	

GENERAL INFORMATION	
Name and Location of Facility Flying J Travel Plaza - Kirkersville 10480 Baltimore Road Kirkersville, OH 43046	POTW Receiving Discharge Village of Kirkersville
Mailing Address of Facility same	Categorical Standard(s) or other Classification Gas Station and Travel Plaza
Contact (Name/Title/Phone) Steve Leister Senior Facility Manager dfm.kirk@flyingj.com 740.964.9601	Other Notes: Frank Khalilpour, General Manager - Flying J Tim Shoemaker of TCC! contracts to operate & maintain plant.

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
S	General Facility Operation Facility well-maintained at time of site visit with only a few housekeeping issues.	U	Pretreatment System Both pumps down on lift station north of I-70, bypassed approximately 1,000 gal on to ground. See attached sheet.
NE	Permit Compliance (Effluent Limitations)	NE	Self-Monitoring and Reporting

Name and Signature of Inspector Gregory Sanders 	Agency / Office / Telephone OEPA/DSW/CDO/(614)728-3851	Date 6-23-2009
Signature of Reviewer Jeff Bohne, Supervisor 	Agency / Office OEPA/DSW/CDO/(614)728-3841	Date 7/27/09

Additional Notes:

On June 15, 2009, I received a phone message from Tim Schumacher of TCCI, operator of Flying J's Kirkersville wastewater treatment plant. He stated that Flying J's lift station that is located on the north side of I-70 had both pumps inoperable and had bypassed approximately 1,000 gallons of sewage to a roadside ditch. Flying J had called a septage hauler, Zemba Bros., to pump the wastewater from lift station wet well. The wastewater was then taken to the Kirkersville WWTP. I was informed by Flying J and TCCI staff that the Village of Kirkersville had previously informed Flying J that the lift station alarm was flashing approximately 30 days prior to the bypass. Flying J staff noticed the lift station bypassing on Friday, June 12, 2009. TCCI staff stated that operation and maintenance of the north side lift station was not part of their contract.

During a site inspection on June 16, 2009, I noted the recirculating sand filters were ponding and no compressed air was being used at the pretreatment system. Compressed air had been previously used in the recirculating sand filters to improve treatment due to clogged media. During inspection of the lift station located on the north side of I-70, I noted staining on the ground around the lift station wet well. The valve pit vault had water, most likely wastewater, standing in the valve pit at a level that submerged the gate and check valves.

During discussion with Flying J and TCCI staff, I was told that current Flying J management did not realize that the lift station on the north side of I-70 was owned and to be maintained by Flying J. There is also a lift station on the south side of I-70 located at the travel plaza that is owned and maintained by Flying J. It appears that the north side lift station did not have any type of maintenance on the pumps, valving or control panel since 1998. The valves had been under water and there were concerns that the gate valves and check valves may not operate. The control panel needed to be repaired and the auto dailer was not functioning. Both pumps needed to be repaired, however, significant work needed to be done to the control panel before the pumps could be installed. I informed Flying J that they need to contact the Village of Kirkersville and their wastewater treatment plant operator to inform them of a possible slug load to their treatment plant when the pumps are replaced in the lift station. I stated that the wastewater in the force main would be anaerobic and could cause a severe oxygen-depletion in Kirkersville's wastewater treatment plant.

On June 17, 2009, I inspected the site in the morning and afternoon. During the morning, Zemba Bros. staff tried to install a portable pump and a quick connect to the valve pit in order to pump from the wet well to the force main and prevent the pumping of the wastewater by truck to the Kirkersville WWTP. There were difficulties making the connection and it was not completed when I left the site at 9 am. I returned around 3:00 pm and the connection was made with the portable pump/generator. I inspected the Kirkersville WWTP and the influent wastewater in the headworks was very black in color. I also followed the force main route and it did not appear that the force main was leaking to the surface of the ground or to the local streams at that time. The generator pump hours reading was 7967 hours.

On June 18, 2009, I inspected the site again, the pump was running and the pump running time was 7983 hours.

On June 23, 2009, I inspected the site and the pump appeared to be running well. The pump running time was 8102 hours.

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4PD0001620090805

- Type the correct permit number and date in both lines
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State of Ohio Environmental Protection Agency

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MAILING ADDRESS:

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

August 5, 2009

Steve Leister
Flying J Travel Plaza
10480 Baltimore Road
Millersport, OH 43046

**Re: Flying J - Kirkersville Reconnaissance Inspection (4DP00016*AP)
Licking County**

Dear Mr. Leister:

Thank you for taking time to meet with me on Thursday, July 30, 2009. During the site visit we discussed the malfunction of the compressor which serves the sand filters. The reason for the reconnaissance inspection was due to an illegal discharge from the sand filters to the adjacent swale along the wastewater treatment plant site.

Attached you will find my report and observations from the reconnaissance inspection. The following items were identified.

1. The recirculating sand filters were ponding and appeared to be overflowing from the filter beds. Compressed air was being used from a new rental compressor. Please see attached pictures.
2. The lift station on the north side of Interstate 70 appeared to be repaired and in operation.

The following actions are required by Flying J Travel Plaza - Kirkersville.

1. A berm or secondary containment should be constructed around the sand filters.
2. It is recommended to replace the sand filter media.
3. Preventative maintenance should be performed on wastewater treatment plant components. This is the second failure within 45 days that has caused an illegal bypass of your wastewater treatment system. Upgrades to the system should be evaluated for your treatment system and made accordingly.

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

Steve Leister
Flying J Travel Plaza
Page -2-

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: greg.sanders@epa.state.oh.us.

Sincerely,

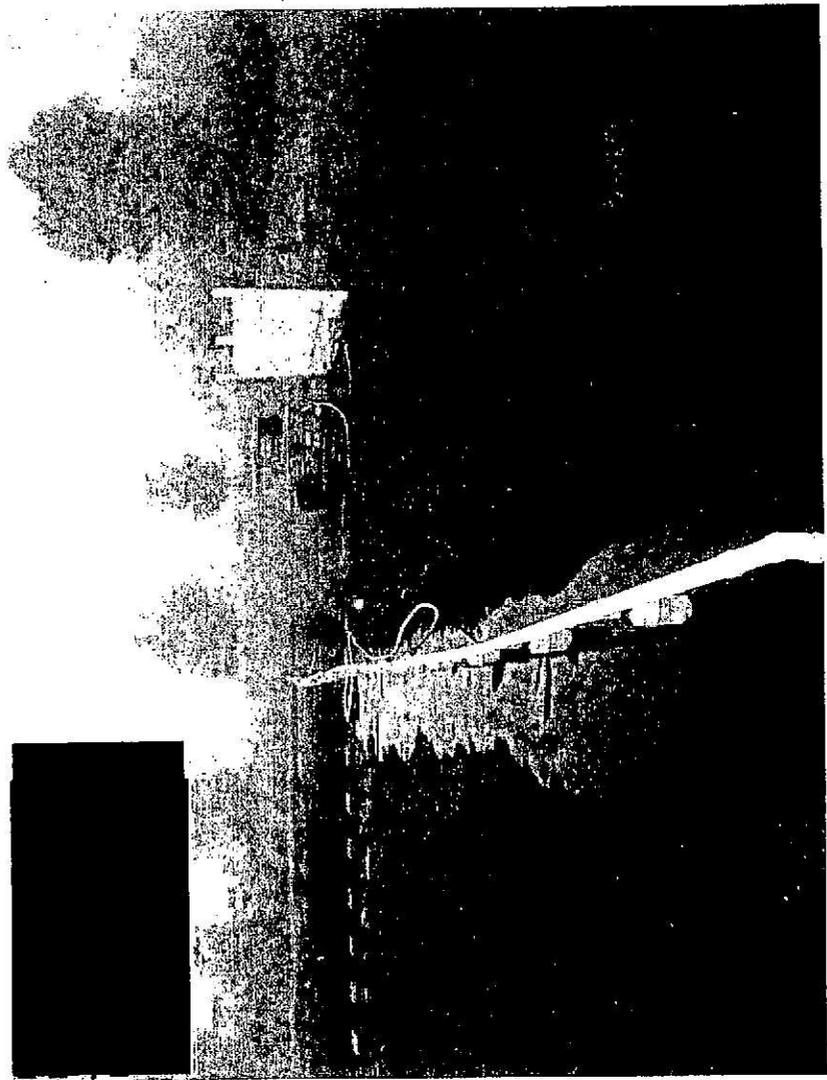
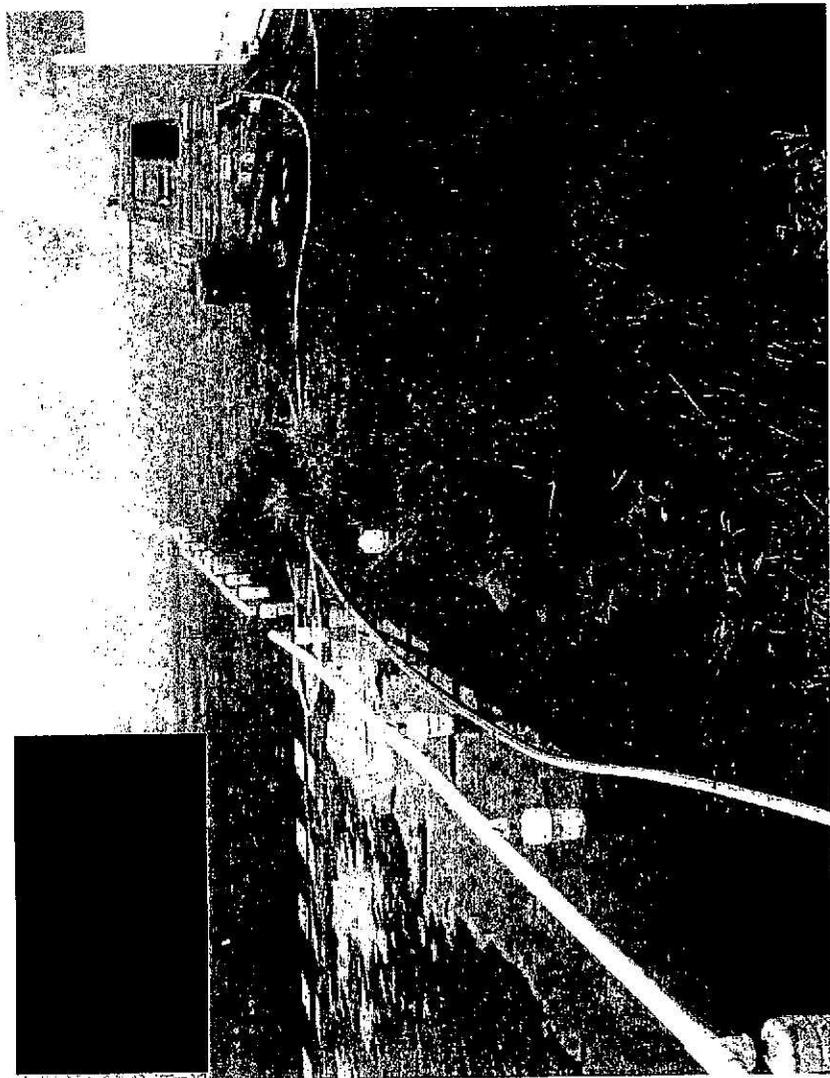


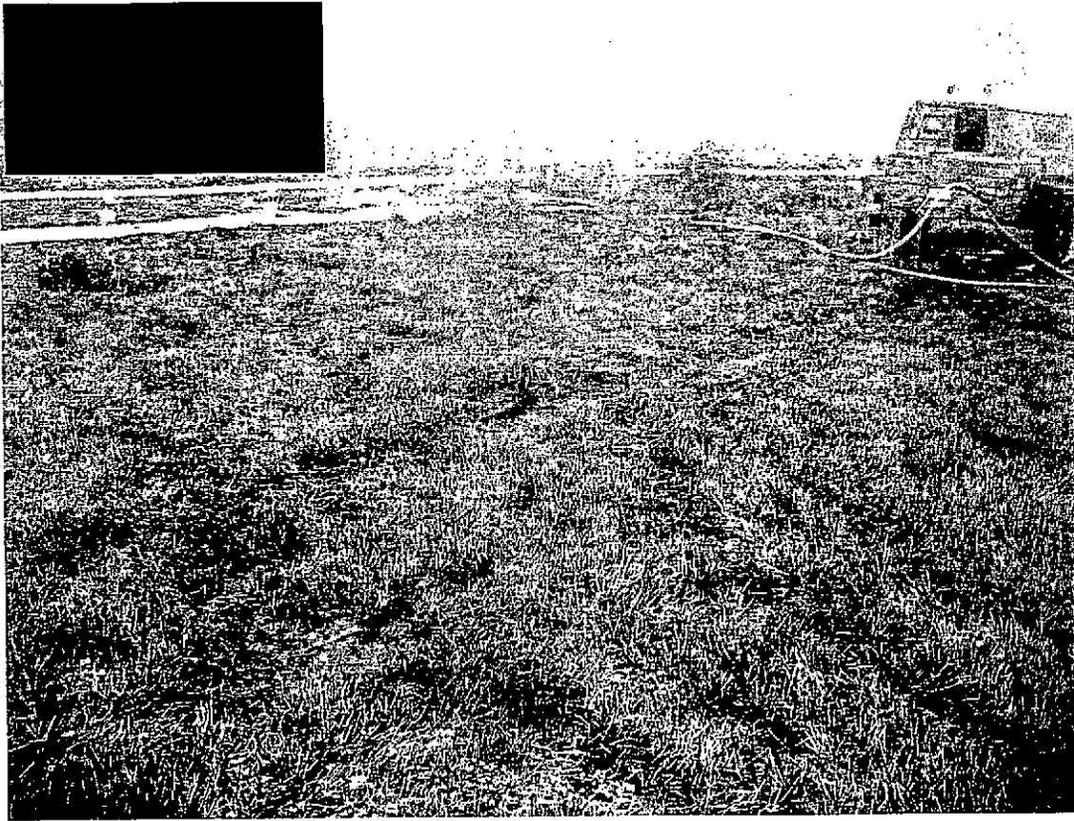
Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure

c: Ryan Laake, Ohio EPA, DSW/CO
Tim Shumaker, TCCI Laboratories, Inc.
Gayle Smith, P.E., Flying J

GLS/nsm 30July2009coverletter_Flying J - Kirkersville .wpd





OhioEPA

PRETREATMENT INSPECTION REPORT

State of Ohio Environmental Protection Agency

NPDES PERMIT NUMBER OHP000227		FACILITY PERMIT NUMBER 4DP00016*AP		DATE CONDUCTED 7/30/2009	
INSPECTION TYPE R	INSPECTOR S	FACILITY TYPE 2	TIME IN 7:00 am	TIME OUT 8:15 am	

GENERAL INFORMATION	
Name and Location of Facility Flying J Travel Plaza - Kirkersville 10480 Baltimore Road Kirkersville, OH 43046	POTW Receiving Discharge Village of Kirkersville
Mailing Address of Facility same	Categorical Standard(s) or other Classification Gas Station and Travel Plaza
Contact (Name/Title/Phone) Steve Leister Senior Facility Manager dfm.kirk@flyingj.com 740.964.9601	Other Notes: Frank Khalilpour, General Manager - Flying J Tim Shumaker of TCCI contracts to operate & maintain plant.

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
NE	General Facility Operation	U	Pretreatment System Compressor not working for sand filters. Sand filters overflowing to adjacent swale. See attached sheet.
NE	Permit Compliance (Effluent Limitations)	NE	Self-Monitoring and Reporting

Name and Signature of Inspector Gregory Sanders <i>GS</i>	Agency / Office / Telephone OEPA/DSW/CDO/(614)728-3851	Date 8/5/09
Signature of Reviewer Jeff Bohne, Supervisor <i>JB</i>	Agency / Office OEPA/DSW/CDO/(614)728-3841	Date 8/5/09

Additional Notes:

I received a call from Tim Schumaker of TCCI at 8:52 am on Tuesday, July 28, 2009, regarding the Flying J at Kirkersville's wastewater treatment plant. Mr. Schumaker stated that the compressor which provides air to the piping system of the sand filters was not working. The compressor has been needed for the past several years due to clogging of the media in the sand filters. Due to the compressor being out of service and the hard rains received in the early morning of Tuesday, July 28, 2009, the sand filters were overflowing and discharging to the adjacent swale along the treatment plant site. The swale discharges to the storm water basin which serves the Flying J facility. Mr. Schumaker stated that a new compressor would be on-line by noon of July 28, 2009.

I inspected the facility on Thursday morning of July 30, 2009. A compressor was operating and blowing air into the piping system of the sand filters. The sand filters were still ponding and a small amount of wastewater was discharging from the sand filters on to the ground.

I discussed the situation with Frank Khalipour, General Manager, and Steve Leister, Senior Facility Manager, of Flying J. They stated that TCCI proposed to install a ditch from the sand filters to the lift station wet well. I stated that this would allow the sand filters to be bypassed and that treatment components should not be bypassed. I suggested a berm or secondary containment around the sand filters. Also, it is recommended to replace the sand filter media. It may be feasible to look into other treatment alternatives other than the existing sand filters. A permit to install application would need to be submitted and approved prior to new treatment components being installed. It was also discussed that an electric compressor be installed instead of relying on a diesel compressor which requires extensive staff hours.

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4PD0001620091109

- Type the correct permit number and date in both lines
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www.epa.state.oh.us

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

November 9, 2009

Steve Leister
Flying J Travel Plaza
10480 Baltimore Road
Millersport, OH 43046

**Re: Flying J - Kirkersville Reconnaissance Inspection (4DP00016*AP)
Licking County**

Dear Mr. Leister:

On Tuesday, October 27, 2009, I made a brief reconnaissance inspection of your wastewater pretreatment system. During the site inspection, I noted the following items:

1. A berm was constructed around the sand filters as requested in my previous letter dated August 5, 2009.
2. The sand filters were still ponding. As stated in my previous letter, it is recommended to replace the sand filter media. Please see attached pictures.
3. The lift station appeared to be working well.

The following actions are required by Flying J Travel Plaza - Kirkersville:

1. Please provide an update regarding the transfer of the off-site lift station to the Village of Kirkersville.
2. It is recommended to replace the sand filter media or take other steps to prevent the ponding of the wastewater on the sand filters.
3. Preventative maintenance should be performed on wastewater treatment plant components. Upgrades to the system should be evaluated for your treatment system and made accordingly.

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

Steve Leister
Flying J Travel Plaza
Page -2-

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: greg.sanders@epa.state.oh.us.

Sincerely,



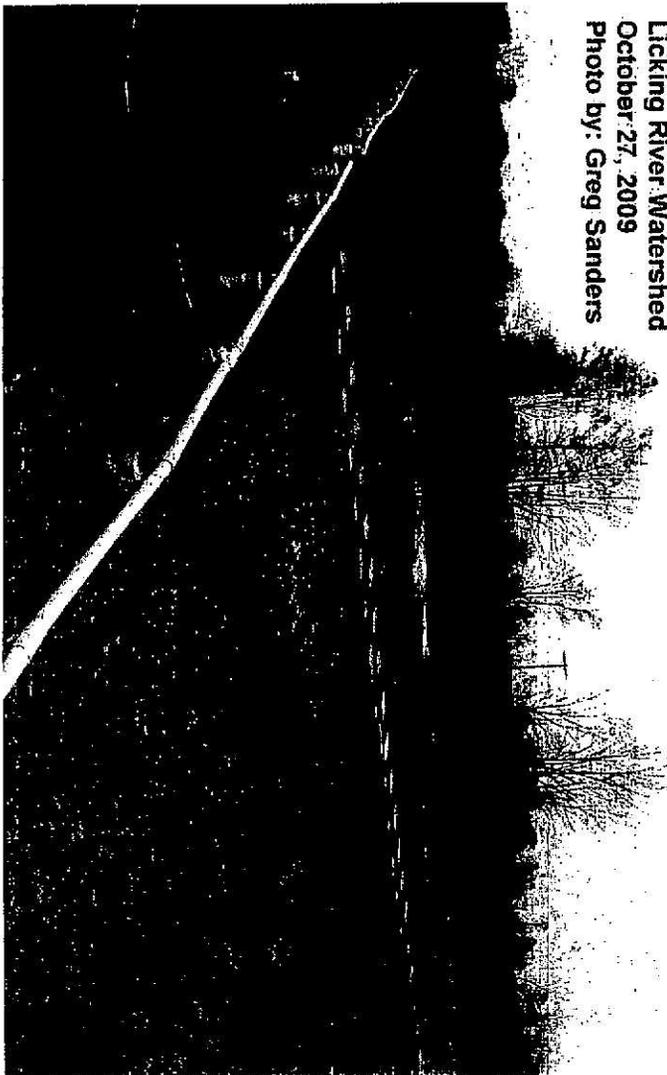
Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure

c: Ryan Laake, Ohio EPA, DSW/CO
Tim Shumaker, TCCI Laboratories, Inc.
Gayle Smith, P.E., Flying J

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Flying J - Kirkersville
IDP Recon
Berm around sand filters
Sand filters ponding
Licking River Watershed
October 27, 2009
Photo by: Greg Sanders



Flying J - Kirkersville
IDP Recon
Berm around sand filters
Sand filters ponding
Licking River Watershed
October 27, 2009
Photo by: Greg Sanders



NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



4PD0001620100713

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MAILING ADDRESS:

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

July 13, 2010

Steve Leister
Flying J Travel Plaza
10480 Baltimore Road
Millersport, OH 43046

**Re: Notice of Violation
Reconnaissance Inspection (4DP00016*AP)
Flying J - Kirkersville / Licking County**

Dear Mr. Leister:

On July 6 and July 7, 2010, I made reconnaissance inspections of your wastewater pretreatment system. During the site inspections, I noted the following items:

1. The re-circulating sand filters were being short-circuited by a trench dug to a drain port in the filter media. This does not allow for treatment of the wastewater as the system was designed. The short-circuiting or bypassing of a treatment unit is a violation of your indirect discharge permit and permit-to-install application.
2. The Flying J – Kirkersville facility is now connected to a public water supply system – Southwest Licking Water and Sewer District.
3. The Flying J – Kirkersville facility will have a change of ownership of its on-site restaurant. The restaurant area will be leased to Denny's.
4. A sample of your wastewater was taken from the effluent of the re-circulating sand filter. Results of this sample will be compared with past sampling data.

The following actions are required by Flying J Travel Plaza – Kirkersville:

1. Depending on the results of our sampling, it may be requested to either completely replace the re-circulating sand filter media or determine another means of treatment. The re-circulating sand filter has not functioned properly for quite some time.

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

Steve Leister
Flying J Travel Plaza
Page -2-

2. It is recommended that the lease agreement between Flying J and Denny's address in detail the responsible party for the maintenance and operation of the grease interceptors, as well as, the discharge of wastewater to Flying J's pretreatment system.
3. The Ohio EPA will be contacting your contract operator, TCCI Laboratories, Inc., in order to start splitting effluent samples over the next several months.

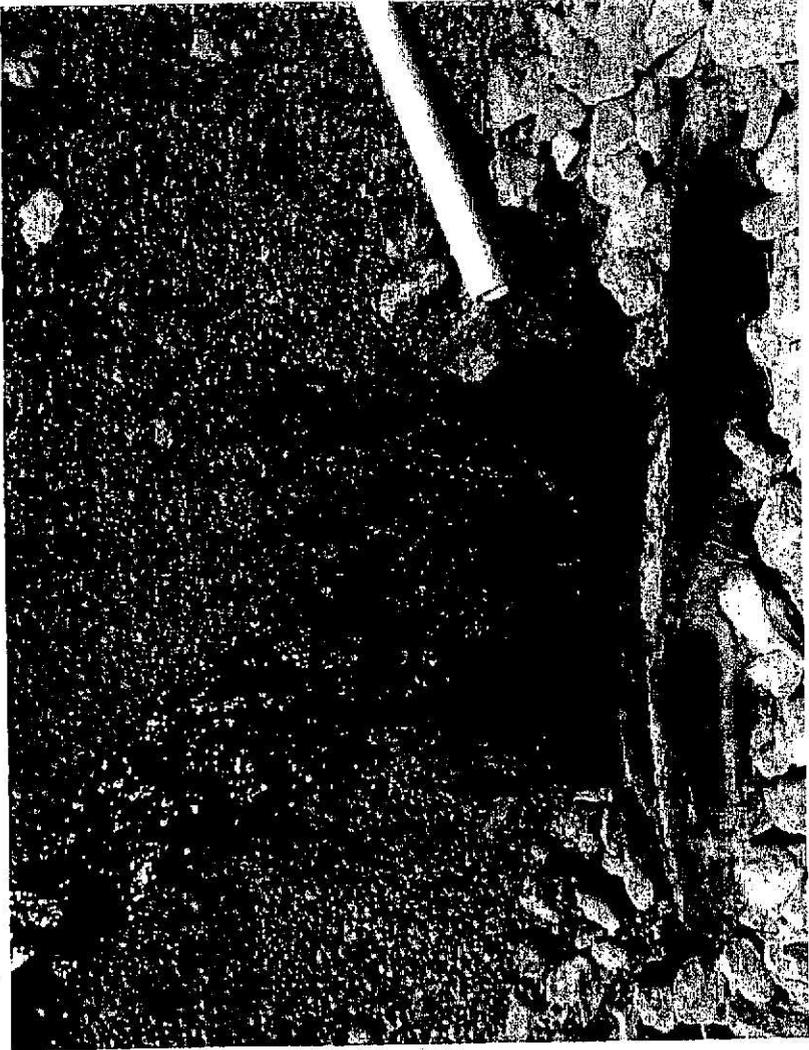
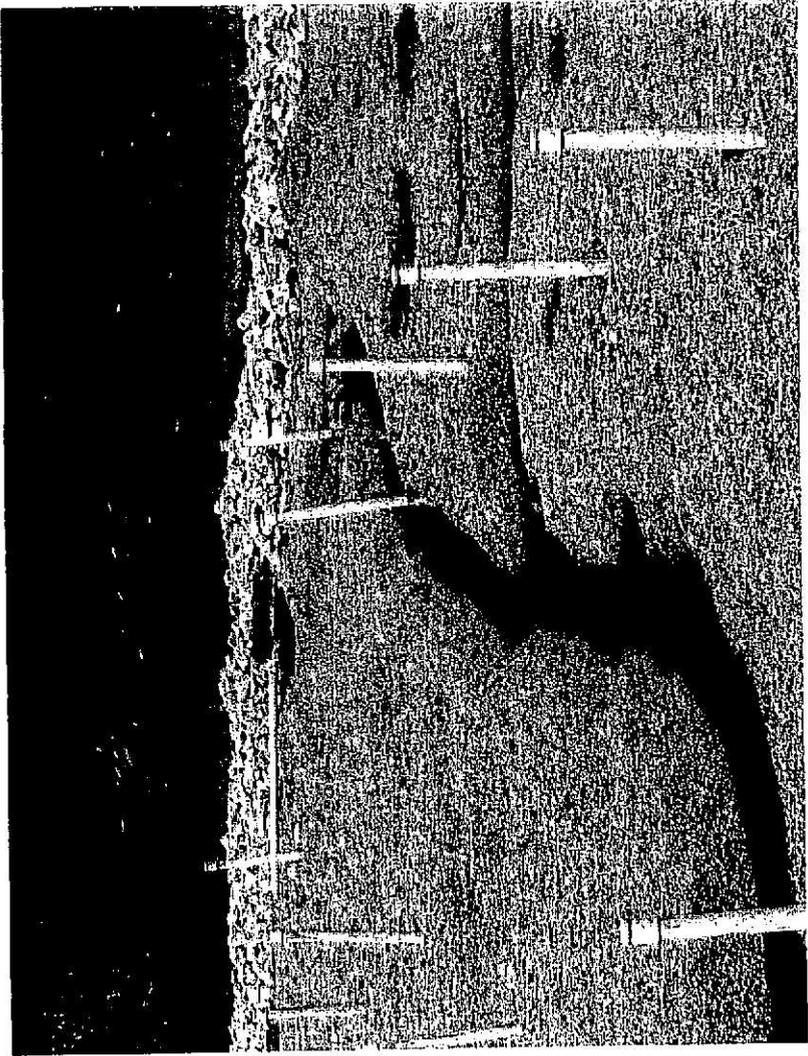
Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: greg.sanders@epa.state.oh.us.

Sincerely,



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

c: Ryan Laake, Ohio EPA, DSW/CO
Tim Shumaker, TCCI Laboratories, Inc.
Gayle Smith, P.E., Flying J



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Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:

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

July 28, 2010

Steve Leister
Flying J Travel Plaza
10480 Baltimore Road
Millersport, OH 43046

**Re: Reconnaissance Inspection (ADP00016*AP)
Flying J - Kirkersville / Licking County**

Dear Mr. Leister:

On July 20, 2010, I made reconnaissance inspections of your wastewater pretreatment system. During the site inspections, I split samples with your contract operator, TCCI Laboratories, Inc. I noted the following items:

1. The recirculating sand filters were no longer being short-circuited by a trench dug to a drain port in the filter media. The recirculating sand filters were not ponding.
2. The Flying J – Kirkersville facility did not have the restaurant operating. The restaurant was under remodeling for a Denny's restaurant. It is strongly recommended that the grease traps for the restaurant be under the control of Flying J. The grease traps and trash trap should be pumped out often.
3. A sample of your wastewater was split with your contract lab, TCCI Laboratories, Inc. The sample was taken from a composite sampler container set up the day prior to the sampling event by TCCI. It was noted that when the sample was taken from the composite sampler container, that the solids had settled to the bottom of the container and the sample was poured from the supernatant on top. In order to get a representative sample, the sample container should be agitated to prevent the solids from settling in the bottom of the container. Also, the sample should have included the restaurant if the restaurant was operating for most of the month. Results of our sampling will be compared with past sampling data.

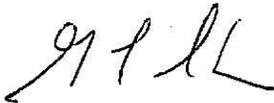
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Steve Leister
Flying J Travel Plaza
Page -2-

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: greg.sanders@epa.state.oh.us.

Sincerely,



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

c: Ryan Laake, Ohio EPA, DSW/CO
Tim Shumaker, TCCI Laboratories, Inc.
Gayle Smith, P.E., Flying J

GLS/nsm 6July2010coverletter_Flying J - Kirkersville