



**Environmental
Protection Agency**

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

March 14, 2011

Mayor and Council
Village of Hebron
116 West Main Street
P.O. Box 898
Hebron, OH 43025

Re: Industrial Pretreatment Compliance Inspection, February 2 & 3, 2011

Ladies and Gentlemen:

On February 2 & 3, 2011, I conducted a Pretreatment Compliance Inspection (PCI) of the Village of Hebron's Industrial Pretreatment Program (IPP). During the first day of the inspection, I interviewed Brian Coughlin and James Barry and reviewed program files at the office of Bird and Bull. The second day of the inspection consisted of reviewing additional pretreatment files, discussing the program and conducting an exit interview. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the Hebron 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 Hebron IPP has improved in controlling industrial user discharges to the wastewater treatment plant (WWTP). There were several episodes of industrial users causing the Village of Hebron's water reclamation facility to violate their NPDES permit during the inspection period, but none in the last sixteen months.
2. The Village of Hebron has submitted the required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in their NPDES permit for the PCI time period. However, the NPDES permit required that technical justification of Hebron's limits and streamlining rules be incorporated into your sewer use ordinance (SUO). The Agency has not received the approved SUO as of this date.
3. No reportable non-compliance (RNC) was identified during the PCI. Industrial user self-monitoring and Hebron independent user sampling have been conducted according to program requirements for the PCI time period of July 2008 through December 2010.

4. There were several instances of industrial user significant non-compliance (SNC) occurred during the PCI time period. The same two significant industrial users were in SNC in 2009 and 2010. A non-significant industrial user was also in SNC in 2010.

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

1. Please update and revise your enforcement response plan in order to prevent industrial users from continuing to violate their industrial user permits.
2. Please update your sewer use ordinance to include the streamlining rules and the technical limits justification. These modifications must be submitted to the Agency as soon as possible.

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

1. It is recommended to include the sampling frequency and pollutant limit in the same chart and on the same page.
2. It is recommended to include the definition of semi-annual in the industrial user permit.
2. Continue to use the plant pipe mapping notebook when conducting annual inspections of industrial users.

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

1. Ensure that the minimum industrial user inspection frequencies are met and documented in program files. It is recommended that cover letters summarizing inspection findings and required actions are continued to be sent along with the inspection report to the industrial users.
2. Hebron 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 Hebron Industrial Pretreatment Program Annual Report.
3. Hebron 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.

Mayor and Council
Village of Hebron
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Please acknowledge the receipt of this letter no later than March 31, 2011.

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

Sincerely,



Greg Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: City of Hebron PCI Forms

c: Dave Robertson, Village of Hebron WWTP
Brian Coughlin, P.E., Bird & Bull
James Barry III, P.E., Bird & Bull
Jeff Bohne, DSW/CDO
Ryan Laake, DSW/CO



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME Village of Hebron WWTP		PERMIT NUMBER 4PB00005*JD	FACILITY NUMBER OH0021539
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED February 2 & 3, 2011

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
**Village of Hebron WWTP
State Route 79
Hebron, OH 43025**

MAILING ADDRESS OF FACILITY
**Mayor and Council
Village of Hebron
Municipal Office
934 West Main Street
Hebron, OH 43025**

CONTACT (NAME/TITLE/PHONE)
**Dave Robertson, Water Reclamation Superintendent; 740.928.8793
Brian Coughlan, Bird & Bull; 614.761.1661
James Barry, Bird & Bull; 614.761.1661**

FACILITY EVALUATION

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

M	Pretreatment Compliance Inspection (PCI)		
	Report attached		
	Inspection period; July 2008 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 2-9-11
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 2-16-11

WENDB AND RNC WORKSHEET
PCI/Audit Checklist

FACILITY INFORMATION	
Name Village of Hebron WWTP	
OH Number OH0021539	NPDES Number 4PB00005*JD
Date of Inspection February 2 & 3, 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	8	II.C.1	SIUS
Number of CIUs	4	II.C.1	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	NOCM
Number of SIUs not inspected or sampled	2	II.E.2	NOIN
Number of SIUs in SNC with standards or reporting	0	II.E.2	PSNC
Number of SIUs in SNC with self-monitoring	0	II.E.2	MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	II.E.2	SNIN

II. RNC/SNC WORKSHEET

INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC

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

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

SECTION I: IU IDENTIFICATION

FILE 1 Industry name and address
Sunfield, Inc.
116 Enterprise Drive
Hebron, OH 43025

Type of industry
Fabricates metal products & metal stamping for automotive industry
SIC Code(s) – 34 & 3469; Metal stamping

IU CLASSIFICATION BY CA:
 CIU 40 CFR _____
 Category(ies) _____
 Non-categorical SIU **X Non SIU**

Average total flow (gpd) **1,390** Average process flow (gpd) **3**
 Industry visited during audit? Yes No **X**

COMPLIANCE STATUS

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

Explanation: **Permit No. 200921 issued 3-1-08; Minor industrial user (MIU); IU permit application dated 1-30-06 Numerous violations, administrative orders sent 12-18-08, 8-2010 & 12-10-10. Compliance schedule on 11-2-10.**

Comments: Larry Phelps, Manager and Rodney Hammer, Safety Manager 740.928.0404
Cooling system is closed loop – Envirokleen flushes & hauls away wastewater periodically.
Mop water goes to storage then hauled by Envirokleen
Shop sink and restroom wastewater to sanitary sewer
Operates 2 shifts per day, 5 days per week; 75 employees total
Control authority inspections on July 31, 2008, May 13, 2009 & April 20, 2010. Plant schematic used.
Control authority sampling on August 12, 2008, by MASI - Selenium, TSS & CBOD5 violations,
Control authority sampling on April 22, 2009, by MASI – no violations, and
Control authority sampling on December 28, 2010, by Alloway – copper violation.

IU – quarterly sampling by Test America
July 7, 2008 – phenols & TSS violations
October 13, 2008 – zinc & CBOD5 violations
January 12, 2009 – TSS violation
April 20, 2009 – no violation
July 20, 2009 – phenols violation
October 5, 2009 – CBOD5 & TSS violations
January 28, 2010 – no violations
January 5, 2010 – zinc, O&G, CBOD5 & TSS violations
April 7, 2010 – zinc & CBOD5 violations
May 4, 2010 – zinc violation
June 1, 2010 – zinc violation
July 6, 2010 – zinc violation
August 11, 2010 – no violation
October 5, 2010 – O&G & CBOD5 violations

Control authority sent notice of violation letters, administrative orders and put on compliance schedule per enforcement response plan (ERP).

FILE <u>2</u> Industry name and address Resinoid Engineering Corporation 251 O'Neil Drive Hebron, OH 43025	Type of industry Custom molder using thermoset materials by compression and injection molding. SIC Code(s) – 3089 – thermoset plastics	
<input checked="" type="checkbox"/> CIU 40 CFR 463.25, & 463.35 Plastic Molding Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) 3,892	Average process flow (gpd) 3,571
	Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
COMPLIANCE STATUS		
<input type="checkbox"/> SNC (period:) <input checked="" type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance		
EXPLANATION: Permit No. 200918; Categorical industrial user (CIU); IU permit application dated 1-30-06 Two reports submitted without signed sampling results – administrative order sent by control authority.		
Comments; John Maurer, Manager 740.928.6115 and Jeff Showers, Maintenance team leader 740.928.6115 Annual cleaning with wastewater discharged to mop sink. Oil/water separator for compressor condensate Parts washer – categorical user, part 463, subpart C 1 qt of sulfuric acid per day and 2 – ½ oz tablets of chlorine tablets per month added to cooling water for pH adjustment. Ion exchange system for water softening, sand filters for TDS then to sanitary sewer. Backwash once/day Continuous pretreatment process. Operates 3 shifts per day, 5 days per week; 85 employees total Flows; cooling water – 2,430 gpd, domestic – 1,306 gpd & water softener – 141 gpd. Plant process piping schematic submitted with IU permit renewal application. Control authority inspections on July 8, 2008, April 29, 2009 and April 20, 2010. Plant piping schematics used for inspections. Control authority sampling on February 11, 2009, by MASI – no violations IU – sampling by Test America October 13, 2008 – unsigned sampling report, no limit violations April 5, 2010 – unsigned sampling report, no limit violations		

SECTION I: IU IDENTIFICATION (Continued)

FILE <u>3</u> Industry name and address Momentive Performance Materials, Inc. 611 O'Neill Drive SE Hebron, OH 43025	Type of industry Manufacturers quartz crucibles for computer industry and quartz tubes for lighting. SIC Code(s) – 3297 Non-metallic mineral products	
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) <p align="center">45,264</p>	Average process flow (gpd) <p align="center">40,586</p>
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

COMPLIANCE STATUS

SNC (period: 11-1-06 to 10-31-07) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION: Permit No. 200911; Significant industrial user (SIU); IU permit application dated 1-20-06
Two pH violations and silver violation in 2009 and 2008.

Comments; **Ken Eckroth, Plant Manager 740.928.7010**
Raw material is sand, acid neutralization w/caustic soda.
Swamp cooling system w/dischARGE to sanitary sewer.
Uses well water for make-up water for cooling tower.
Two ion exchange water systems for cooling towers – closed loop.
Three reverse osmosis systems used within plant – all softened water for industrial systems.
All cooling tower blowdown pumped to sanitary sewer. Carbon dioxide used for pH adjustment.
MPW flushes and hauls cooling towers wastewater periodically.
Cooling water flows increase in summer months.
Batch process for crucibles – 400 crucibles/day X 100 lbs of sand/batch.
Continuous process for tubing.
Operates 3 shifts per day, 7 days per week; 220 employees total

Flows – cooling water 24,054 gpd, process – 38,086 gpd & domestic – 4,678 gpd.
BMP for copper, TSS and CBOD5.
Draft SPCC plan submitted and plant piping schematic with IU permit renewal application.

Control authority inspections on July 31, 2008, May 13, 2009 and May 18, 2010. Plant piping schematics used for inspections.

Control authority sampling on May 13, 2008, by MASI - Silver violation,
Control authority sampling on February 10, 2009, by MASI – no violations, and
Control authority sampling on May 10, 2010, by Alloway – no violations.

IU – sampling by Test America
March 4, 2009 – pH violation
September 3, 2009 – pH violation
March 2, 2010 – no violation
September 7, 2010 – no violation

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

File 1	File 2	File 3	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)
1	1	1			• Identification of pollutants to be monitored	
2	2	2			• Sampling frequency	
X	X	X			• Sampling locations/discharge points defined	
X	X	X			• Reporting requirements	
X	X	X			• Appropriate sample types (grab or composite)	
X	X	X			• Record keeping requirements	403.12(o)
X	X	X			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
X	N/A	N/A			f. Compliance schedules/progress reports (if applicable)	
X	X	X			g. Requirement to notify CA of slug loadings	
X	X	X			h. Requirement to notify CA of spills, bypasses, upsets, etc.	
X	X	X			i. Requirement to notify CA of significant change in discharge	
X	X	X			j. 24-hour notification of violation/resample requirement	403.8(f)(1)(iii)(D)
N/A	N/A	N/A			k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)
Comments 1 – It is recommended to arrange the IU permit to list the frequency w/its limit on the same page. 2 – It is recommended to arrange the IU permit to list the frequency w/its limit on the same page. It is also recommended to include the definition of semi-annual in the IU permits.						

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

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

Comments

3 – IU needs to sign all sampling reports

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

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

Discuss on pollutant-by-pollutant basis.

Yes, data compiled since 1985. No trends evaluated.

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

Yes	No
	X

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

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

Yes	No
X	

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

None

Explain. **Done through MS4 program but not for IU.**

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

[Empty box for additional evaluations/information]

gll

SECTION II COMPLETED BY: Gregory L. Sanders	DATE: 2-9-11
TITLE: Environmental Specialist	TELEPHONE: 614.728.3851

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES (Continued)						
X	N/A	N/A			2. Proper calculation of SNC	403.8(f)(2)(vii)
X	N/A	N/A			a. Chronic	
N/A	N/A	N/A			b. TRC	
N/A	N/A	N/A			c. Pass through/interference	
N/A	N/A	N/A			d. Spill/slug load	
N/A	N/A	N/A			e. Reporting	
X	N/A	N/A			f. Compliance schedule	
N/A	N/A	N/A			g. Other violations (specify)	
X	N/A	N/A			3. Adherence to approved ERP	
X	N/A	N/A			a. Proper response to violation	403.8(f)(5)
X	N/A	N/A			b. Escalation of enforcement	403.8(f)(5)
N/A	N/A	N/A			4. Return to compliance	
N/A	N/A	N/A			a. Within 90 days	
N/A	N/A	N/A			b. Within time specified	
N/A	N/A	N/A			c. Through compliance schedule	
X	N/A	N/A			5. Publication for SNC	403.8(f)(2)(vii)
N/A	N/A	N/A			D. OTHER	
<p>Comments</p> <p>In 2009 & 2010, the same two SIU in SNC. In 2010, a non-significant industrial user was also in SNC. Recommend to update and make ERP more stringent.</p>						

SECTION I COMPLETED BY: Gregory L. Sanders <i>ML</i>	DATE: 2-9-11
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 [403.12]

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.)

New WWTP went on-line on October of 2006, which has multi-barrier approach to watershed. Drafting technical limits justification and modification to sewer use ordinance to include new streamlining rules.

- b. Have you identified any needed changes in your program?

If yes, describe.

Yes	No
X	

Currently revising enforcement response plan (ERP). Expect to have sewer use ordinance modification to council in next 30 days.

B. LEGAL AUTHORITY [403.8(0)(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)(f)&(ii)]

1. Have you changed how SIUs are classified? **Recently changed with last permit, categorical separation.**

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

b. How and when do you identify changes in wastewater discharges at existing IUs (including contributing jurisdictions)?
Water office & brief site visits.

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

1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing, unexpired permit, or other individual control mechanism? [WENDB-NOCM] [RNC-II]	Number	Percent
	0	0%
b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]		0%
If any, explain.		

2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW?	Yes	No
		X
b. How are control mechanisms (specifically limits) developed for these facilities? Discuss:		

3. a. Do you accept any waste by truck, rail, or dedicated pipe?	Yes	No
		X
		X
b. Is any of the waste hazardous as defined by RCRA? If a. or b. above is yes, explain.		
c. Describe your program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)] No septage receiving.		

4. What limits (categorical, local, other) do you apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)] **N/A**

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

OTCO and OWEA events

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

Yes	No
X	

2. Have you identified any pollutants of concern beyond those in your local limits?

(e.g., conventionals, organics, etc.) **The pollutants of concern are copper, molybdenum and total dissolved solids.**

If yes, how has this been addressed? **Discussing options**

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

F. COMPLIANCE MONITORING

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

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

2. Who performs your compliance sampling and analysis?

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

Sampling	Analysis
Alloway	Alloway

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

Require IU to hold for 6 months.

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

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

During annual inspection. Condition in IU permit, no problems so far; SPCC also in place.

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

All

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14] **Language in IU permit, no requests.**

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

Updating public records procedure.

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

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

Bird & Bull maintains all data (hard copy & electronic). Electronic data back up daily. Village has copy of all data except for background data.

b. How long are records maintained? [403.12(o)] **Three years or longer.**

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

Send letters to IU, three council readings and public notice in local newspaper.

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

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

1. Estimate the number of personnel available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sampling and analysis, enforcement, and administration].

5 are available

Dave Robertson, Mike McFarland, Brian Coughlin, James Barry and Kim Johnson.

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

Yes

No

X

If no, explain. **Contracted out.**

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

G. ENFORCEMENT

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

	Yes	No	Explain
• Interference	X		Copper violations
• Pass through	X		Copper violations
• 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): O&G	X		

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

Developed & implemented plan to determine cause of copper and reduce/remove it from the system.

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

Yes	No
	X

If yes, explain.

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

Yes	No
X	
	X

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

Currently has one facility, Sunfield, on compliance schedule.

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

a. Date of last modification: **2002**

b. Problems with implementation: **None**

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

ERP is too vague and not strict enough to curb violations and pass-through. ERP needs updated to prevent numerous violations from IUs.

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: Village of Hebron		2. Location address: 3261 Hebron Road SE, Hebron, OH 43025		
3. a. NPDES permit number 4PB00005 / OH0021539	b. Expiration date 6-30-2014	4. Treatment plant wastewater flows		
		Design 1.5 MGD	Actual 0.6 MGD	
5. Sewer System	a. Separate % 100	b. Combined % 0	c. Number of CSOs 0	
6. a. Industrial contribution (MGD) 0.271 MGD	b. Number of SIUs discharging to plant 8 SIUs (4 are Cat)	8 SIUs	c. Percent industrial flow to plant 45% Industrial Flow	
7. Level of treatment	Type of Process(es)			
a. Primary	Fine screens, bar screens, grit removal, flow equalization and clarifiers			
b. Secondary	Extended aeration activated sludge facility (Orbal system), final clarifiers and aerobic sludge digestion			
c. Tertiary	Tertiary filters, flow monitoring, UV disinfection and biosolids dewatering & dry storage			
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.				
	Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)	Receiving Stream (Times/Year)
a. Metals	1/qtr	1/mn	1/yr	-
b. Organics	3/wk	3/wk	1/yr	1/mn
c. Toxicity testing	-	1/qtr	-	-
d. EP toxicity				
e. TCLP				
9. Effluent Discharge				
a. Receiving water name Beaver Run, South Fork Licking River		b. Receiving water classification WWH		c. Receiving water use AWS, IWS, PCR
d. If effluent is discharged to any location other than the receiving water, indicate where.				

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

C. TREATMENT PLANT INFORMATION (Continued)			
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	Quantity of sludge	dry tons/year	dry tons/year
	41.4		
D. LEGAL AUTHORITY			
1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). Hebron Ordinance #02-03			
b. Date enacted/adopted:	c. Date of most recent revisions		
2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(i-vii)]			
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, some areas in township, but still under SUO.		
List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.			
Jurisdiction Name	Number of CIUs	Number of Other SIUs	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

D. LEGAL AUTHORITY (Continued)		
3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?	Yes	No
		N/A
If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.). Areas in township served but still under SUO.		
4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform. N/A		
a. IWS update		e. Notification of IUs
b. Permit issuance		f. Receipt and review of IU reports
c. Inspection and sampling		g. Analysis of samples
d. Enforcement		h. Other (specify)
E. IU CHARACTERIZATION		
1. a. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]	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	X	• Permit application requirements
• Review of plumbing/building permits	X	• Citizens involvement
		• Other (specify)
c. How often is the IWS to be updated?		
2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(i)(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?	5 years		
2. Does the approved control mechanism include the following? [403.8(f)(1)(iii)]	Yes	No	
a. Statement of duration	X		
b. Statement of nontransferability	X		
c. Effluent limits	X		
d. Self-monitoring requirements			
• Identification of pollutants to be monitored	X		
• Sampling location:	X		
• Sample type	X		
• Sampling frequency: recommend putting limit/frequency on same page	X		
• Reporting requirements:	X		
• Notification requirements	X		
• Record keeping requirements	X		
e. Statement of applicable civil and criminal penalties:	X		
f. Applicable compliance schedule	X		
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?	N/A	Yes	No
	X		
4. Does the program identify designated discharge point(s) for trucked or hauled wastes? [403.5(b)(8)]	X		
If yes, described the discharge point(s) (including security procedures).			
G. APPLICATION OF STANDARDS			
1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]	Yes	No	
	X		
2. If there is more than one treatment plant, were local limits established specifically for each plant?	N/A	Yes	No
	X		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

G. APPLICATION OF STANDARDS (Continued)

3. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL]
[403.3(e)(1); 403.8(i)(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	
b. Cadmium (Cd)					X		4.4
c. Chromium (Cr)					X		126
d. Copper (Cu)					X		-
e. Cyanide (CN)					X		12
f. Lead (Pb)					X		16
g. Mercury (Hg)					X		0.012
h. Molybdenum (Mo)					X		20,612
i. Nickel (Ni)					X		97
j. Selenium (Se)					X		5.2
k. Silver (Ag)					X		1.3
l. Zinc (Zn)					X		-
m. Other (specify): bis 2					X		8.7

H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
a. Inspections				
• CIUs	1/yr	1/yr		1/year
• Other SIUs	1/yr	1/yr		1/year
b. Sampling by POTW				
• CIUs	1/yr	1/yr		1/year
• Other SIUs	1/yr	1/yr		1/year
c. Self-monitoring				
• CIUs	12/yr	2/yr		2/year
• Other SIUs	12/yr	2/yr		2/year
d. Reporting by IU				
• CIUs	12/yr	2/yr		2/year
• Other SIUs	12/yr	2/yr		2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

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

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components: **5 people available**

	FTEs
a. Legal assistance	
b. Permitting	
c. Inspections	
d. Sample collection	
e. Sample analysis	
f. Data analysis, review, and response	
g. Enforcement	
h. Administration?	
TOTAL	5

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

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

L. ADDITIONAL INFORMATION

**Permit-to-install approved in 2005 for new 1.5 MGD Orbal system WWTP.
There is a NPDES permit modification request currently being reviewed.**

gll

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	2-9-11
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851