



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

February 5, 2009

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

Re: Industrial Pretreatment Audit Inspection, January 13 & 14, 2009

Ladies and Gentlemen:

On January 13 & 14, 2009, I conducted a Pretreatment Audit Inspection (PAI) of Delaware County's Olentangy Environmental Control Center Industrial Pretreatment Program (IPP). During the first day of the audit, I interviewed Martin Bell, Pretreatment Coordinator for Delaware County, and reviewed the pretreatment program files. On the second day of the audit, I accompanied Mr. Bell and Ken Rosenbaum on an industrial user inspection of Abrasive Technology. The remainder of the second day consisted of further reviewing the program files and conducting an exit interview with Mr. Bell. The intent of the audit was to determine the compliance of the IPP with state and federal pretreatment regulations and Delaware County's National Pollutant Discharge Elimination System (NPDES) permit. Attached you will find the PAI report.

The findings of the PAI are as follows:

1. Overall, the Delaware County's IPP has been successful in controlling industrial user discharges to the WWTP. There have not been any episodes of industrial users causing the district's WWTP to violate their NPDES permit.
2. Delaware County has submitted required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in their NPDES permit for the PAI time period. The program files were well organized.
3. Inspections and sampling of all required parameters, were not performed for the two significant industrial users in 2007 and 2008.
4. Reporting was not submitted by Tracewell Systems in September of 2007. A notice of violation letter was not issued by Delaware County for the lack of sampling.
5. No reportable non-compliance (RNC) was identified during the PAI. Industrial user self-monitoring sampling was usually submitted within ten days for the PAI time period.

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

There are four required actions that are needed by Delaware County at this time. They include:

1. Inspect all significant industrial users at least once per year.
2. Conduct sampling and analysis of all required parameters for each industrial users at least once per year.
3. Issue notice of violation letters to industrial users for not submitting sampling reports or for submitting late sampling reports.
4. Require industrial users to submit an updated permit application when applying for a new industrial user permit.

There are 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. During the industrial user inspection at Abrasive Technology the following issues were not addressed:
 - A. The raw materials used in the process were not identified.
 - B. The chemicals used or stored on-site were not identified and it was not determined how the chemicals are stored.
 - C. A new schematic of the production/manufacturing line including the wastewater or process flow should be obtained every year, or when changes are made to the plant. The schematic should also include any and all floor drains in or just outside the building.

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

1. Ensure that the minimum industrial user inspection frequencies are met and documented in program files. It is recommended that cover letters summarizing inspection findings and required actions are sent along with the inspection report to the industrial users.
2. Delaware County shall continue ongoing efforts to identify and categorize all industrial users, including non-significant industrial users. Industrial user information, including non-significant industrial users, shall be kept updated on Form AR-3 Industrial User Inventory and reported annually to the Ohio EPA in the Delaware County Industrial Pretreatment Program Annual Report.

3. Delaware County must periodically monitor (sample and/or inspect) non-significant industrial users at a frequency to ensure compliance with pretreatment standards and requirements. Updated information must be kept in the industrial user files.

Please acknowledge the receipt of this letter no later than February 27, 2009.

Ohio EPA recognizes the continuing commitment demonstrated by the Delaware County 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: Delaware County PAI Forms

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



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME OECC - Delaware County		PERMIT NUMBER 4PK00001*ID	FACILITY NUMBER OH0054399
INSPECTION TYPE A	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED January 13 & 14, 2009

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
Olentangy Environmental Control Center

MAILING ADDRESS OF FACILITY
10333 Olentangy River Road, Powell, OH 43065

CONTACT (NAME/TITLE/PHONE)
Chad Antle, Director of Environmental Services 740.8332240
Martin Bell, Pretreatment Coordinator 614.436.7999
Ken Rosenbaum, WWTP Supervisor 614.436.7999

FACILITY EVALUATION

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

M	Pretreatment Audit Inspection (PAI) Attached		

Names(s) and Signature(s) of Inspector(s) Greg Sanders 	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date January 23, 2009
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 2-2-09

WENDB AND RNC WORKSHEET

PCI/Audit Checklist

FACILITY INFORMATION	
Name Olentangy Environmental Control Center - Delaware County	
OH Number 4PK00001*ID	NPDES Number OH0054399
Date of Inspection January 13 & 14, 2009	

I. WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
	Data	Checklist Reference	PCS Code
Number of SIUs	2	II.C.1	SIUS
Number of CIUs	2	II.C.1	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	NOCM
Number of SIUs not inspected or sampled	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 <u>1</u> Industry name and address Abrasive Technologies 8400 Green Meadows Drive Lewis Center, OH 43035	Type of industry Metal finishing
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IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR <u>433</u> , _____ Category(ies) Metal Finishing <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) Average process flow (gpd) 700 gpd 700 gpd Industry visited during audit? Yes <input checked="" type="checkbox"/>
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COMPLIANCE STATUS

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

Explanation:

Comments:

IU permit issued November 2, 2007; effective October 1, 2007 thru September 30, 2009
IU permit does not state why facility is regulated.
Last inspection was December 12, 2006; no inspection in 2007 or 2008.
Q avg. - 600 to 900 gpd
Outfall 001 - combined sanitary & industrial flow
Use Test America as lab.
Nickel is pollutant of concern.
No IU application submitted for latest IU permit.

SECTION I: IU IDENTIFICATION (Continued)

FILE <u> 2 </u> Industry name and address Tracewell Systems 567 Enterprise Drive Westerville, OH 43081	Type of industry Metal finishing
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR <u> 433 </u> , _____ Category(ies) Metal Finishing <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) Average process flow (gpd) <p align="center">7,678 gpd 7,678 gpd</p>
	Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

COMPLIANCE STATUS

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

EXPLANATION: Did not submit report for September 2007.

Comments

Last inspection by Delaware County OECC was December 7, 2006; no inspection in 2007 & 2008.
Use Test America as lab.
Outfall 001 – combined sanitary & industrial flow.
Outfall 002 – 2nd chamber of pH adjustment tank (chromate line).
Outfall 003 – after 3rd weir of vibradyne line.
No IU application submitted for latest IU permit.
IU permit does not state why facility is regulated.

FILE ____ Industry name and address	Type of industry
IU CLASSIFICATION BY CA <input type="checkbox"/> CIU 40 CFR _____, _____ Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) Average process flow (gpd)
	Industry visited during audit? Yes <input type="checkbox"/> No <input type="checkbox"/>

COMPLIANCE STATUS

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

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

File <u>1</u>	File <u>2</u>	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					B. CA COMPLIANCE MONITORING	
					1. Inspection	
1	1				a. Inspection at frequency specified in approved program	403.8
1	1				b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
1	1				c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
					2. Sampling	
X	X				a. Sampling at frequency specified in approved program	403.8
X	X				b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
2	2				c. Analysis for all regulated parameters	403.12(g)(1)
X	X				d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
Comments 1 - Delaware County did not conduct inspections of IUs in 2007 nor 2008. 2 - Delaware County did not conduct analysis of all regulated parameters.						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES						
					1. Identification of and response to violations	403.8(f)(2)(vi)
N/A	N/A				a. Discharge violations	
X	3				• IU self-monitoring	
2	2				• CA compliance monitoring	
X	3				b. Monitoring/reporting violations	
X	4				• IU self-monitoring	
X	4				-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
X	X				-Sampling (e.g., frequency, pollutants)	
X	X				-TTO requirements met	
N/A	N/A				• Notification	
N/A	N/A				-Notified CA of significant change in operation or discharge	403.12(j)
N/A	N/A				-Immediate notification of slug load discharge or accidental spill	OAC 3745-3-05
N/A	N/A				-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
N/A	N/A				-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
N/A	N/A				• Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
N/A	N/A				• Met compliance schedule milestones by required dates	403.12
N/A	N/A				c. Compliance schedule violations	
N/A	N/A				• Start-up/final compliance	
N/A	N/A				• Interim dates	
Comments						
2 - Delaware County did not conduct analysis of all regulated parameters.						
3 - Delaware County did not issue NOV letter for IU not submitting a report.						
4 - Tracewell Systems did not submit report for September 2007.						

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

SECTION I COMPLETED BY:	Gregory L. Sanders	DATE:	January 23, 2009
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.)

September 2007 – new permits issued to IUs; revised sampling dates to a specific month

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

If yes, describe.

Yes	No
	X

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

1. Are there any contributing jurisdictions discharging wastewater to the POTW?
If yes, explain how these multi-jurisdictional agreements have been incorporated into your approved program. **Overlapping service areas – done w/political agreement.**

Yes	No
X	

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

If yes, explain.

Yes	No
	X

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

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

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

When conducting quarterly restaurant sampling, they do windshield survey of new facilities in area. Also use newspaper to check for new industry or businesses. Will follow up with site visit after determined new industry/business.

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

After completing site inspection.

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

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

Number	Percent
0	0%

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

0

If any, explain.

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

Yes	No
	X

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

Discuss:

D. CONTROL MECHANISM EVALUATION (Continued)

Yes	No
X	
	X

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

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

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

Only accepted by their satellite plants (Scioto Reserve & Tartan Fields) - no industry in these developments.

c. Describe your program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)] **Only county hauled waste from 100% residential area.**

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

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

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

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

Yes	No
	X

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

(e.g., conventionals, organics, etc.)

If yes, how has this been addressed?

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

None, no problems with compliance.

F. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC-II]
 (Define the 12 month period September 2007 to October 2008.)

- 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?

	100 %
	100 %
	100 %
	0 %

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

2. Who performs your compliance sampling and analysis?

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

Sampling	Analysis
OECC	Alloway Lab

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)]

No QA/QC done for quarterly or annual samples by Delaware County. Only done if major exceedance.

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

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

Done every inspection.

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

0 / 2

G. ENFORCEMENT

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

	Yes	No	Explain
• Interference		X	
• Pass through		X	
• Fire or Explosions		X	
• Corrosive structural damage		X	
• Flow obstructions		X	
• Excessive flow rates	X		I/I once in awhile in system, but not due to industry
• Excessive pollutant concentrations		X	
• Heat problems		X	
• Interference due to O & G		X	
• Toxic fumes		X	
• Illicit dumping of hauled wastes		X	
• Worker health and safety concerns		X	
• Other (specify):			

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

I/I being corrected by collections department by sewer studies.

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

If yes, explain.

Yes	No
	X

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

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

Yes	No
	X

G. ENFORCEMENT (Continued)

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

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

b. Problems with implementation: **No**

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

No issues with ERP at this time.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14] **Addressed in SUO**

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

No written policy – case by case.

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

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

Hard copy of lab results and IU information

Computerized reports

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

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

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

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

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

Economy & politics.

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

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

2 part time employees

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

Yes

No

X

If no, explain.

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

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

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

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

Yes	No
	X

If yes, what was found?

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

Yes	No
	X
	X

Explain.

4. What efforts have been taken to incorporate pollution prevention into the pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)? **None.**

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

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

Yes

No

X

Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION II COMPLETED BY:	Gregory L. Sanders	DATE:	January 23, 2009
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

C. TREATMENT PLANT INFORMATION				
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.				
1. Treatment plant name: OECC		2. Location address: 10333 Olentangy River Road Powell, OH 43065		
3. a. NPDES permit number 4PK00001*ID OH0054399	b. Expiration date 7-31-2010	4. Treatment plant wastewater flows		
		Design 6.0	MGD Actual 3.65 MGD	
5. Sewer System	a. Separate % 100	b. Combined % 0	c. Number of CSOs 0	
6. a. Industrial contribution (MGD) 0.041		b. Number of SIUs discharging to plant 2		
		% Non-domestic Flow	% Industrial Flow 1.1 %	
7. Level of treatment		Type of Process(es)		
a. Primary	Bar screen, comminution & influent pumping			
b. Secondary	Activated sludge, secondary clarification & ferric chloride addition			
c. Tertiary	Mixed media filters & UV disinfection; New centrifuge under construction, will be able to increase solids from 6% to 22%, may landfill sludge in future			
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.				
	Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)	Receiving Stream (Times/Year)
a. Metals	1/qtr	1/qtr	1/qtr	1/qtr
b. Organics	3/wk	3/wk	1/qtr	1/mn
c. Toxicity testing	-	1/yr	-	1/yr
d. EP toxicity	-	-	-	1/yr
e. TCLP	-	-	-	-
9. Effluent Discharge				
a. Receiving water name Olentangy River		b. Receiving water classification EWH		c. Receiving water use AWS & SRW
d. If effluent is discharged to any location other than the receiving water, indicate where.				

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

C. TREATMENT PLANT INFORMATION (Continued)

	N/A	Yes	No
11. Did the CA submit results of whole effluent biological toxicity testing as part of its NPDES permit application(s)? [122.21(j)(1) and (2)]		X	
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]		X	
b. Has there been a pattern of toxicity demonstrated?			X

12. Indicate methods of sludge disposal.			
Quantity of sludge		Quantity of sludge	
a. Land application	629	dry tons/year	e. Public distribution
			dry tons/year
b. Incineration		dry tons/year	f. Lagoon storage
			dry tons/year
c. Monofill		dry tons/year	g. Other (specify)
			dry tons/year
d. MSW landfill		dry tons/year	

D. LEGAL AUTHORITY

1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority).
Sewer Use Regulation (SUR) – recommend dating SUR & changes / amendments.

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)] SUO – 5-6-2005		Yes	No
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)] (1049.03)		X	
b. Require compliance with standards [403.8(f)(1)(ii)] (1049.03)		X	
c. Control discharges through permit or similar means [403.8(f)(1)(iii)] (1049.05)		X	
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)] (1049.05)		X	
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)] (1049.05)		X	
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)] (1049.06)		X	
g. Comply with confidentiality requirements [403.8(f)(1)(vii)] (1049.05)		X	

3. a. How many contributing jurisdictions are there? 1

List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.		
Jurisdiction Name	Number of CIUs	Number of Other SIUs
City of Columbus	0	0

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

D. LEGAL AUTHORITY (Continued)

3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

Yes	No
X	

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

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

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

E. IU CHARACTERIZATION

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

Yes	No
X	

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

• Review of newspaper/phone book	X	• Onsite inspections	
• Review of water billing records	<input type="checkbox"/>	• Permit application requirements	<input type="checkbox"/>
• Review of plumbing/building permits	<input type="checkbox"/>	• Citizens involvement	<input type="checkbox"/>
		• Other (specify)	<input type="checkbox"/>

c. How often is the IWS to be updated?

>5 yrs

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

Yes	No
X	

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.).			
b. What is the maximum term of the control mechanism?	3 years		
2. Does the approved control mechanism include the following? [403.8(f)(1)(iii)]	Yes	No	
a. Statement of duration	X		
b. Statement of nontransferability	X		
c. Effluent limits	X		
d. Self-monitoring requirements			
• Identification of pollutants to be monitored	X		
• Sampling location:	X		
• Sample type	X		
• Sampling frequency:	X		
• Reporting requirements:	X		
• Notification requirements	X		
• Record keeping requirements	X		
e. Statement of applicable civil and criminal penalties:	X		
f. Applicable compliance schedule	N/A		
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?	N/A	Yes	No
	X		
4. Does the program identify designated discharge point(s) for trucked or hauled wastes? [403.5(b)(8)]	X		
If yes, described the discharge point(s) (including security procedures).			
G. APPLICATION OF STANDARDS			
1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)] IU Permit	Yes	No	
	X		
2. If there is more than one treatment plant, were local limits established specifically for each plant?	N/A	Yes	No
	X		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

G. APPLICATION OF STANDARDS (Continued)							
3. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]							
Partial Technical Evaluation (not all 10 pollutants evaluated)?							
	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric) (mg/l)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)			X		X		0.2
b. Cadmium (Cd)			X		X		0.1
c. Chromium (Cr) (+6)			X		X		0.5
d. Copper (Cu)			X		X		0.5
e. Cyanide (CN)			X		X		0.5
f. Lead (Pb)			X		X		0.5
g. Mercury (Hg)			X		X		0.02
h. Molybdenum (Mo)							
i. Nickel (Ni)			X		X		2.0
j. Selenium (Se)			X		X		2.0
k. Silver (Ag)			X		X		
l. Zinc (Zn)			X		X		2.0
m. Other (specify): BTEX			X		X		0.01
H. COMPLIANCE MONITORING							
1. Indicate compliance monitoring and inspection frequency requirements.							
Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement			
a. Inspections							
• CIUs	Annual	Annual	Annual	1/year			
• Other SIUs	Annual	Annual	Annual	1/year			
b. Sampling by POTW							
• CIUs	Bi-Monthly	Annual	Annual	1/year			
• Other SIUs	Bi-Monthly	Annual	Annual	1/year			
c. Self-monitoring							
• CIUs	Bi-Monthly			2/year			
• Other SIUs	Bi-Monthly			2/year			
• CIUs	Bi-Monthly			2/year			
• Other SIUs	Bi-Monthly			2/year			

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			
1. Does the CA's program define "significant noncompliance"? SUR Chapter XVI	Yes	No	
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)] submitted 5-6 2005, approved 9-9-2005	Yes	No	
3. Indicate the compliance/enforcement options that are available to the POTW in the event of IU noncompliance. [403.8(f)(1)(vi)]			
a. Notice or letter of violation	<input checked="" type="checkbox"/>	f. Administrative Order	<input checked="" type="checkbox"/>
b. Compliance schedule	<input checked="" type="checkbox"/>	g. Revocation of permit	<input checked="" type="checkbox"/>
c. Injunctive relief	<input checked="" type="checkbox"/>	h. Fines (maximum amount):	<input checked="" type="checkbox"/>
d. Imprisonment	<input type="checkbox"/>	• Civil \$/day/violation	
e. Termination of service	<input checked="" type="checkbox"/>	• Criminal \$/day/violation or	
		• Administrative \$ <u>1000</u> /day/violation	
J. DATA MANAGEMENT/PUBLIC PARTICIPATION			
1. Does the approved program describe how the POTW will manage its files and data?	Yes	No	
Are files/records <input type="checkbox"/> computerized? <input checked="" type="checkbox"/> hard copy? <input checked="" type="checkbox"/>	X		
2. Are program records available to the public? Case by case	Yes	No	
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]	X		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components: **2 employees/part time**

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

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

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

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	January 23, 2009
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851

IU SITE VISIT DATA SHEET

IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry: Abrasive Technology, 8400 Green Meadows Drive, Lewis Center, OH 43035	
Date of visit: January 14, 2009	Time of visit: 10:30 am
Name(s) of inspector(s); Martin Bell & Ken Rosenbaum – Delaware County OECC	
Greg Sanders – Ohio EPA	
Provide name(s) and title(s) of industry representative(s).	
Name	Title
Douglas G. Anderson	E-bonding
Kevin M. Rudlosky	Administration, Human Resources
Shawna Mosher	Administration, Regulatory Compliance
Classification assigned by CA: Categorical	
Did the CA inspector review/obtain the following as part of the industrial inspection?	
1. Description of the products manufactured or the services provided by the IU. Yes, metal plating w/nickel & abrasive.	
2. Verification of the IU's classification or discussion of any changes. No, not discussed.	
3. Description of any significant changes in processes or flow. No, not discussed.	
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible) No, not discussed. (Nickel & solvents in another area)	
5. Description of the sample location and any differences in CA and IU locations. SE corner of building – manhole labeled.	
6. Description of the treatment system which is in place. Yes.	
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention. Chemicals & SPCC discussed.	
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems. This waste discussed.	

IU SITE VISIT DATA SHEET

Notes:

WWTP only runs when Doug Anderson on shift; pH adjustment & filter; Q avg – 850 gpd

Filter press achieves 28% solids.

3 shifts running Sunday to Friday; 200 employees total

Haz waste does not have secondary containment.

Floor drains in production area all go to pretreatment system.

Solids from process are recycled.

Nickel is the pollutant of concern for facility.

IU takes their sample from pH adjustment tank; Delaware County & IU's lab takes their sample from outside sampling manhole.

Plant schematic was shown during inspection by Abrasive Technology staff but copy not given to Delaware County.

IU SITE VISIT REPORT FORM COMPLETED BY:	Gregory L. Sanders	DATE:	January 23, 2009
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851