



**Environmental  
Protection Agency**

Deborah S. B. Governor  
L. Fischer, Lt. Governor  
Chris Jones, Director

October 27, 2010

RE: GENEVA  
INDUSTRIAL PRETREATMENT PROGRAM  
PRETREATMENT PROGRAM AUDIT  
NPDES PERMIT 3PD00014\*QD  
ASHTABULA COUNTY

Mayor and Council  
City of Geneva  
44 N. Forest Street  
Geneva, OH 44041

Ladies and Gentlemen:

This office conducted a Pretreatment Audit Inspection (PAI) of the City of Geneva Industrial Pretreatment Program (IPP) on September 29 and October 6, 2010. The purpose of the inspection is to determine if the IPP is in compliance with state and federal pretreatment regulations and requirements. Donna Kniss and John Schmidt represented the Ohio EPA. Beverly Hoffman, Pretreatment Coordinator, and Gary Hydinger, Wastewater Treatment Plant (WWTP) Superintendent, represented the City. One industry, Nordic Air, was visited during the inspection.

The overall evaluation of the IPP is that it is operating very well in a satisfactory manner. However, the following deficiencies were identified during the inspection:

1. The Enforcement Response Plan (ERP) was not dated, so it was impossible to determine when it was last evaluated. It appears that the responsible official designation is not consistent with current job titles. For example, the Assistant City Manager and the Assistant WWTP Superintendent are not listed as personnel who have the authority for certain actions. Failure to have an updated ERP is a deficiency in the requirement found in 40 CFR 403.8(f)(5) and OAC 3745-3-03(C)(5).
2. The "appropriate remedies" listed in the ERP for certain scenarios are not sufficient. For example, a prohibited discharge impacting the WWTP should result in more significant enforcement action than a telephone call or informal meeting. The ERP also did not address repeated non-compliance that did not exceed the threshold for Significant Noncompliance. Failure to have an updated ERP is a deficiency in the requirement found in 40 CFR 403.8(f)(5) and OAC 3745-3-03(C)(5).
3. Section 1043.09(a) of the Sewer Use Ordinance (SUO) states that an industry does not need to notify the City of a bypass if the bypass will not cause a problem. 40 CFR 403.17(c) states that industrial users must notify the City of all bypass events, and does not contain an exemption for bypass events that will not cause a problem. Therefore, this section of the SUO is a deficiency in the requirement found in 40 CFR 403.17(c).

4. The definition of best management practices (BMPs) found in Section 1043.01 of the SUO refers to the prohibited discharges found in OAC 3745-3-04. The SUO also contains a list of prohibited discharges in Section 1043.02(c) which is longer than the list found in OAC 3745-3-04. The BMP definition should refer to the SUO, not the State regulation. This discrepancy can impact the City's ability to enforce its SUO, which is a deficiency in the requirement found in 40 CFR 403.8(f)(1) and OAC 3745-3-03(C)(1).
5. The SUO contains provisions to issue a BMP permit, and requires that the industrial user (IU) submit a BMP plan and annual reports. The City has issued BMP permits to dental offices, and conducts annual inspections of these offices. However, the City has not required the submission of the annual report, which does not comply with the SUO requirements. This discrepancy can impact the City's ability to enforce its SUO, which is a deficiency in the requirement found in 40 CFR 403.8(f)(1) and OAC 3745-3-03(C)(1).
6. Section 1043.03(f) of the SUO requires annual permits. However, the Nordic Air permit duration is two years. This discrepancy can impact the City's ability to enforce its SUO, which is a deficiency in the requirement found in 40 CFR 403.8(f)(1) and OAC 3745-3-03(C)(1). Please note that 40 CFR 403.8(f)(1) (B)(1) and OAC 3745-3-03(C)(1)(c)(1) allow permit durations up to five years.

This office has the following recommendations:

1. The SUO defines oil and grease in Section 1050.02(b) as limited to polar oil and greases of animal or vegetable origin. This is the Grease Control section of the SUO. There is no definition of or limit for oil and grease in Section 1043, the Industrial Pretreatment section. The prohibited discharges include petroleum hydrocarbon oil and grease in quantities that causes pass-through or interference, which is protective, but places the burden of proof on the City if the discharge of petroleum hydrocarbons occurs. The City should consider adding a numeric limit for petroleum oil and grease when it modifies the SUO.
2. The City should consider adding a provision to the SUO requiring an inspection of the grease trap and the requirement to install an external grease trap whenever a restaurant or other significant source of oil and grease is sold.
3. The City should consider adding administrative fines that can be levied by the WWTP superintendent to the SUO. Even small monetary fines can be an effective enforcement tool because it generally increases the attention to problems inside a business.
4. Total dissolved solids (TDS) have become a pollutant of concern at some wastewater treatment plants (WWTPs), and trucked wastes such as landfill leachates have been documented to contain high TDS concentrations. This office recommends that TDS analyses be conducted annually and as part of the annual WWTP priority pollutant scan. This will ensure that the City can evaluate any request to discharge trucked wastes for all pollutants of concern.

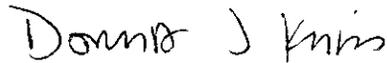
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This office would also like to note an aspect of the IPP that was superior:

Geneva has developed and implemented a comprehensive grease control program, codifying the requirements in Section 1050 of the SUO, and conducting periodic sampling and inspections of restaurants. Restaurant oil and grease that solidifies in the sewer system has been identified as a major reason for sanitary sewer overflows and sewage back-ups. The City's efforts to control oil and grease discharges reduces the potential for sanitary sewer overflows and reduces operation and maintenance expenses in the collection system and at the WWTP.

Please respond to this office within 30 days of the receipt of this letter, documenting the steps that will be taken to address the issues noted above. If you have any questions or comments, please contact me at (330) 963-1285. I can also be reached at [donna.kniss@epa.state.oh.us](mailto:donna.kniss@epa.state.oh.us).

Sincerely,



Donna J. Kniss  
Environmental Engineer  
Division of Surface Water

DJK

cc: Gary Hyding, Geneva WWTP  
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File: Municipal Pretreatment/PCI-Correspondence