



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 23, 2010

RE: CITY OF WADSWORTH
PRETREATMENT PROGRAM
RECONNAISSANCE INSPECTION

Mayor and Council
City of Wadsworth
City Hall
120 Maple Street
Wadsworth, OH 44281

Dear Mayor and Council:

On February 4, 2010, a Pretreatment Reconnaissance Inspection was conducted on the City of Wadsworth pretreatment program. The reconnaissance inspection was conducted as part of the Compliance Evaluation Inspection (CEI) which was also performed that day. Present during the inspection were Messrs. Mike Lucas and Chuck Ash, representing the City of Wadsworth; and this writer, representing Ohio EPA.

The reconnaissance inspection was conducted in an effort to update Ohio EPA on the status of the City's pretreatment program. A more in-depth, Pretreatment Compliance Inspection (PCI) will be conducted on the City's program in the future.

Items discussed during the inspection include the following:

- 1) The City of Wadsworth pretreatment program regulates approximately 6 Industrial Users (IU), which discharge to the Wadsworth wastewater treatment plant (WWTP). Out of the 6 IUs, two are considered Significant Industrial Users (SIUs).
- 2) The City is not considering a program modification request in the near future.
- 3) The approved pretreatment program requires inspection of all SIUs at least once per year. At the time of the February 4th inspection, all 6 IUs had been inspected within the last year. According to Mr. Lucas, all industrial users are inspected once per year, usually in January.
- 4) No Industrial User has been subject to a Show Cause hearing; had its discharge permit revoked; had a Civil or Criminal suit filed against them by the City; or been placed on a compliance schedule for correction of violations contained within their IU discharge permit.
- 5) According to Messrs. Lucas and Ash, all IU discharge permits (IDP) issued by the City are currently effective. However, the expiration dates of the IDPs need to be checked, as their exact expiration dates were not readily known at the time of the inspection, but were believed to expire in 2012.

- 6) Each year the IUs send in a discharge disclosure form to the City. The City of Wadsworth has not sent out an in-depth Industrial Waste Survey (IWS) to all the Industrial Users within the past 5 years. It is strongly recommended that an IWS be sent out to all IUs, requesting an update, if any, on information submitted in the past.
- 7) The City of Wadsworth WWTP does not receive hauled waste or septage for treatment.
- 8) Within the last year the Wadsworth WWTP and sanitary sewer collection system has not experienced any of the following due to industrial discharges to their sewer system:
 - a. Interference,
 - b. Fire or explosion,
 - c. Corrosive structural damage,
 - d. Flow obstructions,
 - e. Heat problems,
 - f. Oil and grease interference,
 - g. Toxic fumes,
 - h. Illicit dumping of hauled waste,
 - i. Excessive flow rates or pollutant concentrations, and
 - j. Worker health and safety issues.

The City of Wadsworth is encouraged to continue implementation of its Industrial Pretreatment Program as effectively as possible. The City should evaluate the current status of the pretreatment program, particularly the IDPs for expiration dates. Industrial Waste Surveys should also be sent out to all IUs, requesting updates on the facilities. If, and when, an SIU list change is desired, a Pretreatment Program Modification Request should be sent to this office for consideration and recommendation.

If there are questions or comments regarding the content of this correspondence, please contact this office.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt