



State of Ohio Environmental Protection Agency

**Northeast District Office**

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

December 16, 2008

RE: CITY OF ROCKY RIVER  
PRETREATMENT PROGRAM  
RECONNAISSANCE INSPECTION

Mayor and Council  
City of Rocky River  
21012 Hilliard Rd.  
Rocky River, OH 44116

Dear Mayor and Council:

On November 25, 2008, a Pretreatment Reconnaissance Inspection was conducted on the City of Rocky River pretreatment program. Present for discussion of the program were Messrs. Art Stolze, Jeff Harrington, and Keith Bovard, representing the City of Rocky River, 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) may be conducted on the City's program in the future.

Items discussed during the meeting include the following:

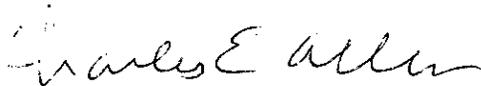
- 1) The City of Rocky River pretreatment program includes 5 Industrial Users (IU) which discharge to the Rocky River wastewater treatment plant (WWTP). Total number of Categorical Industrial Users (CIUs) is two. Categorical Industrial Users are also considered Significant Industrial Users (SIUs).
- 2) The 2 Industrial Users which fall under Categorical Industrial User federal pretreatment guidelines are American Metals, and Q Panel. Both of the CIUs are located in the City of Westlake, whose sanitary sewers are tributary to the Rocky River WWTP.
- 3) The approved pretreatment program requires inspection of all SIUs at least once per year. At the time of the reconnaissance inspection, both SIU/CIUs had been inspected within the last year.
- 4) All IUs discharging to the Rocky River WWTP have been issued Indirect Discharge Permits (IDPs) by the City, as per its approved program requirements. All IDPs expire during the same year.
- 5) As required in the NPDES Permit for the Rocky River WWTP, local limits were re-evaluated in 2006 for the WWTP. Based upon the local limits evaluation, the nickel and mercury limits for IUs were lowered from what they previously were, and IDPs were modified accordingly.
- 6) 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.

- 7) The IU American Metals recently had a problem with elevated zinc levels being discharged from their facility. The facility determined that bag filters used in their air pollution equipment were at cause, and the entity voluntarily corrected the problem, thus lowering the elevated zinc levels. No Notice of Violation (NOV) letter had to be sent from the City, and no Show Cause hearing was scheduled.
- 8) The Industrial Waste Survey (IWS) for IUs in the City has not been updated in several years. The IWS is a questionnaire sent to all IUs tributary to the sewer system, and requests information regarding the industry's manufacturing process; materials used; number of employees; quantities and characteristics of wastewater generated and discharged; etc.
- 9) It is recommended that the City conduct another IWS for their sewer system in the upcoming year.
- 10) The City WWTP does not receive hauled waste or septage for treatment.
- 11) Within the last year, the WWTPs and sanitary sewer collection system have 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 Rocky River is encouraged to continue implementation of its Industrial Pretreatment Program as effectively as it has been. If, based upon new information obtained by the IWS, an SIU list change is desired, then 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/mr

cc: Jeff Harrington, Supt., City of Rocky River WWTP