



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

RE: Hancock County
City of Findlay
NPDES Permit

June 30, 2009

Mr. Randy Greeno, Superintendent
Water Pollution Control Center
City of Findlay
1201 South River Road
Findlay, Ohio 45840

Dear Mr. Greeno:

On June 16, 2009, a compliance inspection was made of the Findlay wastewater treatment facility and a pretreatment compliance inspection (PCI) was made of the City's approved pretreatment program.

Compliance Inspection

The compliance inspection consisted of a question and answer session followed by a walk-through of the plant. Overall, the plant appeared to be operating well. At the time of inspection, all major components of the wastewater treatment system were in service. The grounds were well maintained. Three of the four oxidation ditches were in operation. Effluent from the clarifiers was clear. A generator has been installed at the plant.

We are in receipt of your self-monitoring reports covering the months of June 2008 through May 2009 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
9/12/2008	001	31616	Fecal Coliform			AK
5/8/2009	001	31616	Fecal Coliform			AK

Pretreatment Compliance Inspection

The pretreatment compliance inspection followed a checklist designed to evaluate the major areas of the City's program and a file review of one of the City's industrial users was completed. Our inspection findings and recommendations are summarized below.

Mr. Randy Greeno
June 30, 2009
Page Two

The significant industrial user list will be changing with the addition of City Laundry. The treatment plant does accept septage, but the haulers have to be licensed through the health department and the treatment plant. The hauler must submit a manifest and a sample is collected from each load.

All industrial user inspections and sampling requirements are being carried out. The new pretreatment streamlining rules are being applied. Your implementation of Findlay's approved pretreatment program remains satisfactory.

Our completed inspection forms are enclosed for you review. If you have any questions, please contact me at 419-373-3019.

Yours truly,

Michelle Sharp
Michelle Sharp
Environmental Specialist II
Division of Surface Water

pc: ~~NWDC File with enclosure~~
Ryan Laake, CO, DSW, w/enclosure (pretreatment inspection forms)



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME City of Findlay WWTP	PERMIT NUMBER 2PD00008	FACILITY NUMBER OH0025135
INSPECTION TYPE P	INSPECTOR Sharp	FACILITY TYPE 1
		DATE CONDUCTED June 16, 2009

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY <i>City of Findlay WWTP 1201 South River Road Findlay, Ohio 45840</i>
MAILING ADDRESS OF FACILITY <i>City of Findlay WWTP 1201 South River Road Findlay, Ohio 45840</i>
CONTACT (NAME/TITLE/PHONE) <i>Randy Greeno / WWTP Superintendent / 419-424-7187</i>

FACILITY EVALUATION												
(S = Satisfactory, M = Marginal, U = Unsatisfactory)												
<table border="1" style="width: 100%;"> <tr><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td></tr> <tr><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td></tr> <tr><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td></tr> </table>												
* See inspection letter												

Names(s) and Signature(s) of Inspector(s) <i>Michelle Sharp</i> Michelle Sharp	Agency / Office / Telephone Ohio EPA / NWDO / 419-373-3019	Date 6-30-09
Signature of Reviewer <i>Elizabeth Wick for</i> Elizabeth Wick	Ohio EPA / NWDO / 419-373-3002	Date 6-30-09

POTW PRETREATMENT COMPLIANCE CHECKLIST

PCI CHECKLIST CONTENTS

- Cover Page and Acronym List
- Section I IU File Evaluation
- Section II Supplemental Data Review/Interview
- Section III Evaluation and Summary (Optional)
- Attachment A Pre-Inspection Checklist
- Attachment B Pretreatment Program Profile
- Attachment C Worksheets
 - WENDB/ RNC Worksheet
 - IU Site Visit Report Form (Optional)
 - File Review Worksheets (Optional)
- Attachment D Supporting Documentation

Control Authority (CA) name and address	Date(s) of PCI
<i>City of Findlay 1201 South River Road Findlay, Ohio 45840</i>	<i>6-16-2009</i>

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
<i>Michelle Sharp</i>	<i>ESII/Ohio EPA</i>	<i>419-373-3019</i>

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
<i>Randy Greeno</i>	<i>Superintendent/Findlay WWTP</i>	<i>419-424-7187</i>

ACRONYM LIST

Acronym	Term
AO	Administrative Order
BMP	Best Management Practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally Different Factors
FTE	Full-Time Equivalent
FWA	Flow-Weighted Average
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not Applicable
ND	Not Determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total Toxic Organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base

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.

IU IDENTIFICATION

FILE 1 Industry name and address
Ball Metal Container Group
12340 Township Road 99
Findlay, Ohio 45840

Type of industry
Coil Coating PS
Can Making

IU CLASSIFICATION BY CA:
 Categorical SIU - 40 CFR 465(D), _____,
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd) 173,500	Average process flow (gpd) 92,000
Industry visited during PCI? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS

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

Comments

FILE ____ Industry name and address

Type of industry

IU CLASSIFICATION BY CA:
 Categorical SIU - 40 CFR _____, _____,
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd)	Average process flow (gpd)
Industry visited during PCI? Yes <input type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS

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

Comments

General Comments

SECTION I: IU FILE EVALUATION

Industry Name					INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Use NA (not available) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Use an "x" in the space when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.	
Ball Metal Container	File	File	File	File		
<i>1</i>					IU FILE REVIEW	Reg. Cite
					A. CA NOTIFICATION OF IU	
<i>NA</i>					1. Notified of classification (new IU) or change in classification (existing IU)	403.8(f)(2)(iii)
<i>NA</i>					* BMR/90-day report submitted (for new IU)	403.12(b)&(d)
<i>x</i>					2. Notified of applicable RCRA standards	403.8(f)(2)(iii)
Comments						

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
x					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
x					2. Control mechanism contents	403.8(f)(1)(iii)
x					a. Statement of duration (<5 years)	
x					b. Statement of nontransferability w/o prior notification	
x					c. Listing of applicable effluent limits (local, categorical standards)	
x					d. Selfmonitoring requirements	
x					i. Identification of pollutants to be monitored	
x					ii. Sampling frequency	
x					iii. Sampling at locations/discharge points adequately defined	
x					iv. Appropriate sample types (grab or composite)	
x					v. Reporting requirements	
x					vi. Record-keeping requirements (3 years minimum)	
x					e. Statement of applicable civil and criminal penalties	
NA					f. Compliance schedules	
x					g. Requirement to notify CA of slug loadings	
x					h. Requirement to notify CA of spills, bypasses, upsets, etc.	
x					i. Requirement to notify CA of significant change in discharge	
x					j. 24-hour notification of violation/resample requirement	

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
C. CA APPLICATION OF IU PRETREATMENT STANDARDS						
x					1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(ii)
x					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
x					a. Proper classification by category/subcategory	
x					b. Proper classification as new/existing source	
x					c. Proper application of limits for all regulated pollutants	
x					d. Proper calculation and application of production-based standards	403.6(e)
x					e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
x					3. Application of local-limits	
x					4. Application of most stringent limits	403.8(f)(1)(ii)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File I	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	403.8(f)(1)(iii)(D)
x					1. Sampled at frequency specified in approved	
x					2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
x					3. Sampled all parameters for which local or categorical limits applied	
x					4. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	403.8(f)(2)(v)
x					1. Inspected at frequency specified in approved program	
x					2. Documentation of inspection activities	403.8(f)(2)(v)
x					3. Evaluated need for slug discharge control plan at least every two years	403.8(f)(2)(v)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
E. CA ENFORCEMENT ACTIVITIES						
NA					1. Response to violations	403.8(f)(2)(vi)
NA					a. Discharge violations	
NA					b. Monitoring/reporting violations	
NA					c. Compliance schedule violations	
NA					2. Proper calculation of SNC	403.8(f)(2)(vii)
NA					a. Chronic	
NA					b. TRC	
NA					c. Pass-through/interference caused by spill or slug discharge	
NA					d. Reporting requirements	
NA					3. Publication for SNC	403.8(f)(2)(vii)
NA					4. Adherence to approved ERP	403.8(f)(5)
NA					a. Proper response to violations	
NA					b. Escalation of enforcement	

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
F. SELF-MONITORING AND REPORTING						
<i>X</i>					1. Sampled at frequency specified in control mechanism/regulation	403.12(c)&(h)
<i>X</i>					2. TTO Requirements met	
<i>X</i>					a. TOMP submitted and updated (if applicable)	
<i>X</i>					b. TTO sample results or certification statement submitted as required	
<i>X</i>					3. Timely self-monitoring reports in accordance with control mechanism	403.12(c)&(h)
<i>X</i>					4. Reported for all required pollutants	403.12(g)(1)&(h)
<i>X</i>					5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
<i>NA</i>					6. Met compliance schedule milestones by required dates	403.12(c)
<i>NA</i>					7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
<i>NA</i>					8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
<i>NA</i>					9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
<i>NA</i>					10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
<i>NA</i>					11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments:

SECTION I COMPLETED BY:	<i>Michelle Sharp</i>	DATE:	
TITLE:	<i>ESII</i>	TELEPHONE:	<i>419-373-3019</i>

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. Have you made any changes to the approved program since the last inspection? (Local limits, ERP, SUO, control mechanisms, SIU list, etc.)

Yes	No
x	

If yes, discuss.

The local limits have been reviewed and have remained the same. An SIU will be added – City Laundry.

2. Have you identified any needed changes?

Yes	No
	x

If yes, describe.

B. IU CHARACTERIZATION [403.8(1)(2)(i)&(iii)]

1. How do you identify and characterize new IUs?
(is IWS used?)

Determination is made when the facility files applications/plans.

2. How and when do you identify changes in wastewater discharges at existing IUs
(especially to determine if they need to be classified as a SIUs)

Yearly inspections are completed.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENB~NOCM][RNC~I] 0 %
 If any, explain.

2. a. How many control mechanisms were allowed to expire prior to reissuance? 0
 If any explain.

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.

c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?

Yes	No
x	

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS [403.8(f)(1)(iii)]

1. a. How and when do you evaluate SIUs for the need to develop slug control discharge plans?
(check on CA's definition of slug discharge)
If any, explain.

Question in Application and during annual inspection.

b. How many SIUs were evaluated in the past two years?

All

2. a. Describe any wastes hauled to the POTW.
Leachate from landfill and septage.

b. If any IUs have their wastewater hauled to the POTW, how do you ensure all applicable standards (local and categorical) are met?

NA

c. List IUs that haul their wastewater to the POTW.

NA

E. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were the following: [403.8(l)(2)(v)][WENDB~NOIN][RNC:II]
(Define the 12 month period May 2007 to May 2008.)

a. Not sampled or not inspected at least once [WENB~NOIN]

0	%
---	---

b. Not sampled at least once

0	%
---	---

c. Not inspected at least once (all parameters)?

0	%
---	---

If any, explain.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB~SNIN]

0

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

ENFORCEMENT

1. Which of the following enforcement actions did you use during the past year?

- a. Notice or letter of violation
- b. Administrative Order
- c. Administrative fine
- d. Show cause hearing
- e. Compliance schedule
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of service
- j. Other (specify)

Yes	No
	X
	X
	X
	X
	X
	X
	X
	X
	X
	NA

Explain if appropriate:

2. Did the treatment plant experience any following during the past year?

- a. Interference
- b. Pass through
- c. Fire or explosions (flashpoint, etc.)
- d. Corrosive structural damage
- e. Flow obstructions
- f. Excessive flow rates
- g. Excessive pollutant concentrations
- h. Heat problems
- i. Interference due to O & G
- j. Toxic fumes
- k. Illicit dumping of hauled wastes
- l. Worker health and safety concerns
- m. Other (specify)

Yes	No	Explain
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		

If yes, how did you respond?

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT, (continued)

3. Were you made aware of any hazardous waste discharges to the POTW? [403.12 (j)&(p)]

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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G. GENERAL OBSERVATIONS/INFORMATION ENFORCEMENT

Have you had any problems (general or specific) implementing your approved program?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
------------------------------	--

Additional Comments/Observations/Information:

SECTION I COMPLETED BY: <i>Michelle Sharp</i>	DATE: <i>June 19, 2008</i>
TITLE: <i>ESII</i>	TELEPHONE: <i>419-373-3019</i>

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> • Status of program modifications (Ref. 403.18 /Checklist II.A.1) 	<i>None</i>	<i>None</i>
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> • Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> • Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1) 	<i>None</i>	<i>None</i>

C. IU CHARACTERIZATION

• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)

None

None

D. CONTROL MECHANISM

• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/
Checklist II.D.1)

None

None

Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)

None

None

Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/
Checklist II.D.3&4)

None

None

Description	Recommended Action	Required Action
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> • Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&(iii); 403.5 /Checklist I.A) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> • Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3) 	<i>None</i>	<i>None</i>
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> • Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> • Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> • Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4) 	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) 	<i>None</i>	<i>None</i>
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans (Ref. 403.8(f)(2)(v)/Checklist I.B.2.d; II.F.8) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b) 	<i>None</i>	<i>None</i>
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1) 	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&5;II.G.2.c&d, 5&6) 	<i>None</i>	<i>None</i>
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H) 	<i>None</i>	<i>None</i>
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources (Ref. 403.8(f)(3)/Checklist II.I) 	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources (Checklist II.J.1&2) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness (Checklist II.J.1) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Integration of pollution prevention (Checklist II.J.3,4&5) 	<i>None</i>	<i>None</i>

K. ADDITIONAL EVALUATIONS/INFORMATION

[Empty box for additional evaluations/information]

SECTION III COMPLETED BY: *Michelle Sharp*

DATE: *June 19, 2008*

TITLE: *ESII*

TELEPHONE: *419-373-3019*

WENDB AND RNC WORKSHEET

FACILITY INFORMATION				
Name <i>City of Findlay WWTP</i>	Date of Inspection <i>May 14, 2008</i>			
OH Number <i>OH0025135</i>	NPDES Number <i>2PD00008</i>			
I. WENDB DATA ENTRY WORKSHEET				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS
		PCI	AUDIT	Code
Number of SIUs	<i>8</i>	Annual	Annual	SIUS
Number of CIUs	<i>6</i>	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	-	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	-	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	-			PSNC
Number of SIUs in SNC with self-monitoring	-			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	-	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	-			
Technical Evaluation of Local Limits (Y/N) (Audit)	-			
Adoption of technically-based limits (Y/N) (Audit)	-			

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



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0025135	2PD00008	06/16/2009	C	Sharp	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Findlay Water Pollution Control Center 1201 South River Road Findlay, Ohio 45840	9:30 AM	8/1/2008
	Exit Time	Permit Expiration Date
	2:30 PM	1/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Randy Greeno, Superintendent	419-424-7187	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Randy Greeno, Superintendent	419-424-7187	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
S	Permit	S	Flow Measurement
S	Records/Reports	S	Laboratory
S	Operations & Maintenance	S	Effluent/Receiving Waters
S	Facility Site Review	S	Sludge Storage/Disposal
S	Collection System	N	Other
S		S	Pretreatment
S		S	Compliance Schedule
S		S	Self-Monitoring Program

Section D: Summary of Findings (Attach additional sheets if necessary)	

Inspector	Reviewer
<p><i>Michelle M Sharp</i> 6/30/09</p> <p>Michelle M. Sharp Date</p> <p>Division of Surface Water</p> <p>Northwest District Office</p>	<p><i>Elizabeth A Wick</i> 6/26/09</p> <p>Elizabeth A. Wick, P.E. Date</p> <p>Water Quality Engineer</p> <p>Division of Surface Water</p> <p>Northwest District Office</p>

Permit # : OH0025135
NPDES #: 2PD00008

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- | | |
|---|-----|
| (a) Correct name and mailing address of permittee | Y |
| (b) Correct name and location of receiving waters..... | Y |
| (c) Product(s) and production rates conform with permit application (Industries)..... | N/A |
| (d) Flows and loadings conform with NPDES permit..... | Y |
| (e) Treatment processes are as described in permit application... | Y |
| (f) New treatment process(es) added since last inspection..... | Y |
| (g) Notification given to State of new, different or increased discharges..... | N/A |
| (h) All discharges are permitted..... | Y |
| (i) Number and location of discharge points are as described in permit..... | Y |

Comments/Status:

(f) A generator has been installed at the plant.

Section F: Compliance Schedules/Violations

- | | |
|--|-----|
| (a) Any significant violations since the last inspection..... | N |
| (b) Permittee is taking actions to resolve violations..... | N/A |
| (c) Permittee has a compliance schedule..... | Y |
| (d) Compliance schedule contained in <input type="text" value="Permit"/> | |
| (e) Permittee is meeting compliance schedule..... | Y |

Comments/Status:

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... IV
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: IV
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N/A
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

3 ring binder/computer log/bench sheets
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... N
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con t)

Collection System:

- (a) Percent combined system: 10%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... Y
- (e) CSOs monitored and reported in accordance with permit..... Y
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

Collection System
(h) Portable generator and pump.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... Y
(c) Sludge adequately disposed..... Y
(Method:Landfill)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... N
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... N
(g) Adequate sludge storage provided at plant..... Y
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... Y
(j) Any complaints received in last year regarding sludge..... N
(k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:Magmeter)
- (b) Calibration frequency adequate Y
(Date of last calibration: 4/21/2009)
(c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
 - (c) Analyses being performed more frequently than required by permit. Y
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: Metals, Mercury/Bioassay

Lab name: Alloway/Enviroscience

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: 8-31-2008

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	None	None	Clear	

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Permit # : OH0025135
NPDES # : 2PD00008