Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 23, 2012

Mayor and Council
City of Marysville
125 East Sixth Street
Marysville, OH 43040

Re: **Industrial Pretreatment Compliance Inspection, December 15 & 16, 2011**
City of Marysville Water Reclamation Facility (WRF)

Ladies and Gentlemen:

On December 15 and 16, 2011, I conducted a Pretreatment Compliance Inspection (PCI) of the City of Marysville's Industrial Pretreatment Program (IPP). During the first day of the PCI, I interviewed Rick Varner, WRF superintendent, and Helen Owens, pretreatment coordinator. During the first day, I also reviewed the pretreatment program files. The second day of the PCI consisted of further reviewing the program files and conducting an exit interview with Mr. Varner and Ms. Owens. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the Marysville National Pollutant Discharge Elimination System (NPDES) permit. Attached you will find the PCI report.

The findings of the PCI are as follows:

1. Overall, the City of Marysville's IPP has again been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). Ms. Owens is doing a good job administering the pretreatment program. There have not been any documented episodes of industrial users causing the City's WWTP to violate their NPDES permit.

2. The City of Marysville 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 PCI time period of January 1, 2009 to December 1, 2011. The program files were well organized.

3. No reportable non-compliance (RNC) was identified during the PCI. Industrial user self-monitoring and Marysville independent user sampling have been or will be conducted according to program requirements for the PCI time period.

There are two required action that is needed by Marysville at this time.

1. The industrial user permit for Nestle R&D Center, Inc. is expired and needs to be re-issued.

2. The industrial user permit for Bulk Transit is expired and needs to be re-issued

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

The recommended actions by the Agency from the last inspection have been addressed and implemented by the City of Marysville. No program deficiencies were identified during the PCI. 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. Marysville 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 Marysville Industrial Pretreatment Program Annual Report.

3. Marysville 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 March 9, 2012.

Ohio EPA recognizes the continuing commitment demonstrated by the Chairman and Council, Marysville Pretreatment and WWTP staff to implement state and federal pretreatment requirements. 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: City of Marysville PCI Forms

c: Ryan Laake, DSW/CO

ec: Greg Sanders, DSW/CDO

GS/nsm 15December2011PCIcoverletter Marysville

Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME	PERMIT NUMBER	FACILITY NUMBER
City of Marysville WRF	4PE00002*BD	OH0136271

INSPECTION TYPE	INSPECTOR	FACILITY TYPE	DATE CONDUCTED
P	S	1	December 15 & 16, 2011

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

City of Marysville WRF
12901 Beecher Gamble Road
Marysville, OH 43040

MAILING ADDRESS OF FACILITY

Mayor and Council
City of Marysville
125 East Sixth Street
Marysville, OH 43040

CONTACT (NAME/TITLE/PHONE)

Rick Varner, Superintendent; 937.642.1036
Helen Owen, Pretreatment Coordinator; 740.636.2383

FACILITY EVALUATION

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

S	Pretreatment Compliance Inspection (PCI)		
	Report attached		
	Inspection period; 1/01/2009 through 12/01/2011		

Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 1-5-12
Signature of Reviewer Jeff Bohne, Supervisor	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 1-18-12

Form 3560

WENDB AND RNC WORKSHEET
PCI Checklist

FACILITY INFORMATION

Name **City of Marysville WRF**

OH Number **OH0136271** | NPDES Number **4PE00002*BD**

Date of Inspection **December 15 & 16, 2011**

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	7	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	0	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	1	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 1 Industry name and address	Type of industry
Nestle R&D Center, Inc. **809 Collins Avenue** **Marysville, OH 43040-4002**	**Research lab for coffee, tea, creamer, etc...** **SIC #8731; Commercial & physical research**

IU CLASSIFICATION BY CA:	Average total flow (gpd)	Average process flow (gpd)
☐ CIU 40 CFR _____, _____,	**34,580**	**30,545**
Category(ies) _____	Industry visited during audit? Yes ☐ No X	
X **Non-categorical SIU** ☐ Non SIU		

COMPLIANCE STATUS

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

Explanation: **Mercury violation on 4-15-11 and pH violation on 2-2-10. NOV letters sent by CA.**

Comments:

Kenneth G. Boehm, President & Director; 937.642.7015
David Stiltner, Facility Supervisor; 937.645.2279

IU permit #NES - 073109, permit effective 8/01/06 and expired 7/31/09. IU permit needs to be re-issued.
Local limits issued in IU permit.
Self monitoring of once per quarter in listed permit. Analysis conducted by Belmont Labs.
Control authority (Marysville) inspects and samples 1/yr.
SPCC in file, dated April 8, 2005.
Schematic of sampling manhole in file for all SIUs.
Sampling manhole (outfall 001) located at entrance on Collins Avenue.
Wastewater sources consist of cooling water, boiler feed, process and sanitary.
Pretreatment program includes grease trap certification.
Private well on-site for fire protection only.
Facility operates 24 hrs/day & 7 days/wk (295 days/yr).
Facility manufactures 6,000# of coffee, 2,160# of tea, 4,800# of confections & 720# of creamers per day.
Mercury violation on 4-15-11 and pH violation on 2-2-10. NOV letters sent by CA.
pH violation was at 12.16 su and limit is 12.0 su.
CA conducted last inspection on 12-27-10.

FILE 1 cont. Industry name and address	Type of industry
Nestle R&D Center, Inc. **809 Collins Avenue** **Marysville, OH 43040-4002**	**Research lab for coffee, tea, creamer, etc...** **SIC #8731; Commercial & physical research**

Comments;

IU permit limits as follows:

Parameter	daily maximum mg/l	frequency	type
Flow	monitor only	daily	cont.
pH	5.5-12.0	1/mn	grab
BOD	200	1/mn	comp
TSS	250	1/mn	comp
O&G	50	1/mn	grab
Cu	0.29	1/qtr	comp
Cn	0.076	1/qtr	comp
Pb	0.54	1/qtr	comp
Hg	0.0016	1/qtr	comp
Ni	0.754	1/qtr	comp
Ag	0.265	1/qtr	comp
Zn	1.22	1/qtr	comp
Sb	monitor only	1/qtr	comp
As	monitor only	1/qtr	comp
Cd	monitor only	1/qtr	comp
CN	monitor only	1/qtr	comp
Cr	monitor only	1/qtr	comp
Bis	monitor only	1/mn	comp
Strontium	monitor only	1/mn	comp
TDS	monitor only	1/mn	comp
TTO	monitor only	1/yr	comp

SECTION I: IU IDENTIFICATION (Continued)

FILE 2 Industry name and address	Type of industry
Veyance Technologies, Inc. **13601 Industrial Parkway** **Marysville, OH 43040**	**Manufacturers rubber conveyor belts reinforced with either fabric or steel cable** **SIC #3052**

IU CLASSIFICATION BY CA:	Average total flow (gpd)	Average process flow (gpd)
☐ CIU Category(ies) _____ ☒ Non-categorical SIU ☐ Non SIU	**28,833**	**28,833**
	Industry visited during audit? Yes ☐ No ☒	

COMPLIANCE STATUS

☒ **SNC (period: 7/01/10 to 11/01/11)** ☐ Noncompliance/corrected ☐ Noncompliance/continuing ☐ In compliance

EXPLANATION: **On-going issues related to copper violations. Currently investigating source of copper.**

Comments;

Bryan Thompson, Plant manager; 937.644.8910
Tom William, Environmental Coordinator; 937.644.8932

IU permit #VT - 07312012, permit effective 8/01/09 and expired 7/31/12.
Industry changed ownership from Goodyear Tire and Rubber to Veyance Technologies, Inc. in 2007.
Local limits issued in IU permit.
Self monitoring of once per quarter in listed permit. Analysis conducted by Belmont Labs.
Control authority (Marysville) inspects and samples 1/yr.
SPCC in file, dated January 30, 2003.
Schematic of sampling manhole in file for all SIUs.
Sampling manhole (outfall 001) is a combined outfall located at stream on south of Industrial Parkway.
Wastewater sources consist of non-contact cooling water, boiler feed and sanitary.
Facility operates 24 hrs/day & 7 days/wk (295 days/yr) with 350 total employees.
Facility manufactures 300,000# of conveyor belt per day (250,000 conveyor belts per year).
CA conducted last inspection on 12-15-10.

FILE **2 con't.** Industry name and address	Type of industry
Veyance Technologies, Inc. **13601 Industrial Parkway** **Marysville, OH 43040**	**Manufacturers rubber conveyor belts reinforced with either fabric or steel cable** **SIC #3052**

Comments

IU permit limits as follows:

Parameter	daily maximum mg/l	frequency	type
Flow	monitor only	daily	cont.
pH	5.5-12.0	1/mn	grab
BOD	200	1/mn	comp
TSS	250	1/mn	comp
O&G	50	1/mn	grab
Cu	0.29	1/qtr	comp
Cn	0.076	1/qtr	comp
Pb	0.54	1/qtr	comp
Hg	0.0016	1/qtr	comp
Ni	0.754	1/qtr	comp
Ag	0.265	1/qtr	comp
Zn	1.22	1/qtr	comp
Sb	monitor only	1/qtr	comp
As	monitor only	1/qtr	comp
Cd	monitor only	1/qtr	comp
CN	monitor only	1/qtr	comp
Cr	monitor only	1/qtr	comp
Bis	monitor only	1/mn	comp
Strontium	monitor only	1/mn	comp
TDS	monitor only	1/mn	comp
TTO	monitor only	1/yr	comp

IU permit revised to include HEM greater than 50 mg/l is surcharge without NOV.
IU permit revised to include HEM-SGT greater than 50 mg/l is NOV.

Violations include:

Cu violation of 0.829 mg/l on 10/20/10, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.453 mg/l on 02/80/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.403 mg/l on 01/04/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.338 mg/l on 03/08/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.366 mg/l on 04/05/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.592 mg/l on 05/18/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.476 mg/l on 08/11/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.
Cu violation of 0.448 mg/l on 11/01/11, NOV letter sent by CA. Cu limit is 0.29 mg/l.

SECTION I: IU IDENTIFICATION (Continued)

FILE 3 Industry name and address

Bulk Transit
7177 Industrial Parkway
Plain City, OH 43064

Type of industry

Transportation – dry bulk and liquid hauler
Sanitize large tanks for corn syrup
Wash out bulk tanks

IU CLASSIFICATION BY CA:

X CIU

Category(ies) **40 CFR Part 442; Transportation cleaning**

☐ Non-categorical SIU ☐ Non SIU

Average total flow (gpd)	Average process flow (gpd)
No flow listed	**No flow listed**

Industry visited during audit? Yes ☐ No X

COMPLIANCE STATUS

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

EXPLANATION: **pH and O&G issues off and on from 7/08/10 to 1/04/11, now in compliance.**

Comments;

Ron Dewalt, President; 614.873.4632
Donald Hess, Director of Maintenance; 614.873.4632

IU permit #BT - 073109, permit effective 8/01/06 and expired 7/31/09. IU permit needs to be re-issued.
Combined limits at outfall BT-001 and local limits at outfall BT-002.
Self monitoring of once per quarter in listed permit. Analysis conducted by Belmont and MASI Labs.
Control authority (Marysville) inspects and samples 1/yr.
SWP3 & SPCC in file, dated June 30, 2005.
Schematic of sampling manhole in file for all SIUs.
Sampling manhole (outfall BT-001) located downstream of the lift station.
Sampling manhole (outfall BT-002) located at the next manhole downstream of outfall BT-001.
Outfall BT-001 is sampled 12 times/year and BT-002 is sampled 4 times/year.
PTI #01-9311 issued for pretreatment system consisting of oil-water separator on 01-06-00.
Wastewater sources consist wash water and sanitary.
CA conducted last inspection on 5-14-10.

Violations include:

pH violation of 5.29 s.u. on 04/06/10, NOV letter sent. pH limit is between 5.5 and 12.0.
pH violation of 4.55 s.u. on 05/18/10, NOV letter sent. pH limit is between 5.5 and 12.0.
pH violation of 3.8 s.u. on 07/08/10, NOV letter sent. pH limit is between 5.5 and 12.0.
pH violation of 4.12 s.u. on 12/15/10, NOV letter sent. pH limit is between 5.5 and 12.0.
pH violation of 3.84 s.u. on 12/16/10, NOV letter sent. pH limit is between 5.5 and 12.0.
O&G violation of 64 mg/l on 12/17/10, NOV letter sent. O&G limit is 26 mg/l.
pH violation of 5.16 s.u. on 01/04/11, NOV letter sent. pH limit is between 5.5 and 12.0.

Corrective action required to meet pH limit. It was determined that the fountain syrup had low pH. Revised cleaning protocol to capture syrup in trailer and first rinse.

FILE 3 con't. Industry name and address	Type of industry
Bulk Transit **7177 Industrial Parkway** **Plain City, OH 43064**	**Transportation – dry bulk and liquid hauler** **Sanitize large tanks for corn syrup** **Wash out bulk tanks**

Comments

IU permit limits for outfall BT-001 as follows:

Parameter	daily maximum mg/l	frequency	type
Flow	monitor only	daily	cont.
SGT-HEM	26	3 days/qtr	grab
Cu	0.84	3 days/qtr	comp
Hg	0.0031	3 days/qtr	comp

IU permit limits for outfall BT-002 as follows:

Parameter	daily maximum mg/l	frequency	type
Flow	monitor only	daily	cont.
pH	5.5-12.0	1/mn	grab
BOD	200	1/mn	comp
TSS	250	1/mn	comp
O&G	50	1/mn	grab
Cu	0.29	1/qtr	comp
Cn	0.076	1/qtr	comp
Pb	0.54	1/qtr	comp
Hg	0.0016	1/qtr	comp
Ni	0.754	1/qtr	comp
Ag	0.265	1/qtr	comp
Zn	1.22	1/qtr	comp
Sb	monitor only	1/qtr	comp
As	monitor only	1/qtr	comp
Cd	monitor only	1/qtr	comp
CN	monitor only	1/qtr	comp
Cr	monitor only	1/qtr	comp
Bis	monitor only	1/mn	comp
Strontium	monitor only	1/mn	comp
TDS	monitor only	1/mn	comp
TTO	monitor only	1/yr	comp

IU permit revised to include HEM greater than 50 mg/l is surcharge without NOV.
IU permit revised to include HEM-SGT greater than 50 mg/l is NOV.

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

Comments

1 – IU permits expired for Nestle R&D, Inc. and Bulk Transit.

File 1	File 2	File 3	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	X			• Identification of pollutants to be monitored	
X	X	X			• Sampling frequency	
2	2	2			• Sampling location/discharge points defined	
X	X	X			• Reporting requirements	
X	X	X			• Appropriate sample types (grab or composite)	
X	X	X			• Record keeping requirements	403.12(o)
2	2	2			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
X	X	X			f. Compliance schedules/progress reports (if applicable)	
X	X	X			g. Requirement to notify CA of slug loadings	
X	X	X			h. Requirement to notify CA of spills, bypasses, upsets, etc.	
X	X	X			i. Requirement to notify CA of significant change in discharge	
X	X	X			j. 24-hour notification of violation/resample requirement	403.8(f)(1)(iii)(D)
X	X	X			k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)

Comments

2 - Schematic of sampling manhole in file for all SIUs.

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					B. CA COMPLIANCE MONITORING	
					1. Inspection	
X	X	X			a. Inspection at frequency specified in approved program	403.8
X	X	X			b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
X	X	X			c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
					2. Sampling	
X	X	X			a. Sampling at frequency specified in approved program	403.8
X	X	X			b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
X	X	X			c. Analysis for all regulated parameters	403.12(g)(1)
X	X	X			d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)

Comments

File 1	File 2	File 3	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)
					a. Discharge violations	
X	X	X			• IU self-monitoring	
X	X	X			• CA compliance monitoring	
					b. Monitoring/reporting violations	
X	X	X			• IU self-monitoring	
X	X	X			-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
X	X	X			-Sampling (e.g., frequency, pollutants)	
X	X	X			-TTO requirements met	
					• Notification	
N/A	N/A	N/A			-Notified CA of significant change in operation or discharge	403.12(j)
N/A	N/A	N/A			-Immediate notification of slug load discharge or accidental spill	OAC 3745-3-05
X	X	X			-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
X	X	X			-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
X	X	X			• Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
N/A	N/A	N/A			• Met compliance schedule milestones by required dates	403.12
N/A	N/A	N/A			c. Compliance schedule violations	
N/A	N/A	N/A			• Start-up/final compliance	
N/A	N/A	N/A			• Interim dates	

Comments

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					C. CA[illegible]ORCEMENT ACTIVITIES (Continued)	
					2. Proper calculation of SNC	403.8(f)(2)(vii)
/A	N/A	N/A	X		a. Cl[illegible]	
	N/A	N/A	N/A		b. TRC	
	N/A	3	3		c. Pass through/interference	
	N/A	N/A	N/A		d. Spill/slug load	
	X	X	X		e. Reporting	
	N/A	N/A	N/A		f. Compliance schedule	
	N/A	N/A	N/A		g. Other violations (specify)	
	X	X	X		3. Adherence to approved ERP	
	X	X	X		a. Proper response to violation	403.8(f)(5)
	X	X	X		b. Escalation of enforcement	403.8(f)(5)
					4. Return to compliance	
	X	X	No	X	a. Within 90 days	
	N/A	N/A	N/A		b. Within time specified	
	N/A	N/A	N/A		c. Through compliance schedule	
	N/A	N/A	X		5. Publication for SNC	403.8(f)(2)(vii)
					D. OTHER	

Comments

3 – Possible pass through or interference;

Veyance Technologies, Inc. had copper issues and violations for several years. The WRF had copper violations on June 9, 2010. Not confirmed Veyance Techologies, Inc. caused WRF violations.

Bulk Transit had pH issues in 2009 and 2010. The WRF had pH violations on June 7, 2009 through June 11, 2009. Not confirmed Bulk Transit caused WRF violations.

SECTION I COMPLETED BY:	**Gregory L. Sanders**	DATE:	1-5-13
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.)

FOG program started in 2010 that includes grease trap certification program.

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

Yes	No
	X

If yes, describe.

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

1. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes	No
	X

If yes, explain how these multi-jurisdictional agreements have been incorporated into your approved program.

Jerome Village Community is pending. Only residential flows are expected and will be billed as one entity.

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

Yes	No
	X

If yes, explain.

Had issue with Made from Scratch, a bakery/catering business. They had discharged a lot of oil & grease in past. New grease trap certification and change in business practices has helped prevent grease clogs. Facility is now inspected 3 times per week.

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

1. Have you changed how SIUs are classified? **No, SIUs still categorized the same. There are seven industrial users; two categoricals and five non-categoricals. One is in SNC for reporting, Veyance Technologies, Inc.**

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

Questionnaire package sent to new entities. A site inspection is conducted if it may need to be permitted.

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

Identify changes through IU inspections.

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
2	29 %

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II] **Two IUs were not issued a permit since July 31, 2009.** | 29 %

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:

	Yes	No
3. a. Do you accept any waste by truck, rail, or dedicated pipe?	X	
b. Is any of the waste hazardous as defined by RCRA?		X

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

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)]

Warner Septic Tank Hauling hauls wastewater from county plants and discharges to old WWTP at isolated tanks. No septage is discharged. New Day Farms once hauled storm water pond wastewater to old WWTP.

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)] **Local Limits**

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)]

Training and seminars.

Local limits evaluation: [403.8(f)(4); 122.21(j)]	Yes	No
2. Have you identified any pollutants of concern beyond those in your local limits?		X

(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? **No problems.**

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 PCI period: **01/01/2009** to **12/01/2011**.)

a.	Not sampled or not inspected at least once [WENDB-NOIN]	0	0%
b.	Not sampled at least once	0	0%
c.	Not inspected at least once (all parameters)?	0	0%
d.	In SNC with self monitoring and not inspected or sampled?	0	0%

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

2. Who performs your compliance sampling and analysis?

	Sampling	Analysis
• Metals	City staff	Belmont Labs
• Cyanide	City staff	Belmont Labs
• Organics	City staff	Belmont Labs
• Conventionals	City staff	Belmont Labs
• Other (specify)		

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)]

Split samples.

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)]

Evaluate the need for slug control plan at IU site visits, the worst case scenario is evaluated.

b. How many SIUs were evaluated for the need to develop slug discharge control plans in the last 2 years? **All of them- 7**

G. ENFORCEMENT

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

	Yes	No	Explain
• Interference	X		Cu & pH violations at WRF
• Pass through	X		Cu & pH violations at WRF
• Fire or Explosions		X	
• Corrosive structural damage		X	
• Flow obstructions		X	
• Excessive flow rates		X	
• 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:

The CA worked with Veyance Technologies, Inc. to determine the source of copper that causes violations. Ohio EPA staff suggested checking if possible water leaching out copper from copper water lines. Ohio EPA staff also suggested checking if any new suppliers of chemicals are using copper in the ingredients.

Bulk Transit had pH issues for several years, but it was not confirmed that Bulk Transit was the source of the WRF violation.

	Yes	No
b. Were you made aware of any hazardous waste discharges to the POTW?		X

If yes, explain.

	Yes	No
2. a. Do you use compliance schedules? [403.8(f)(1)(iv)(A)]		X
b. If yes, are they appropriate? Provide examples.		

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

a. Date of last modification: **Last modification done on 10/16/03.**

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.

It has been fairly effective in keeping IUs in compliance.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14] **Confidentiality is addressed in SUO.**

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

There is a form for the request and it is addressed in the SUO.

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

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

Hard copy and electronic copy of files in computer. Regularly back-up files on computer.

b. How long are records maintained? [403.12(o)] **Five plus years on-site.**

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

Public notice and readings at council meetings.

5. Explain any community issues impacting the pretreatment program.(I. e., economics, politics, new development, etc.) **None**

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].	1

2. Do you have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.) If no, explain.	Yes	No
	X	

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.

	Yes	No
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)?		X

   If yes, what was found?

	Yes	No
3. a. Have you implement any kind of public education program? **None**		X
b. Are there any plans to initiate a program to educate users about pollution prevention?		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 at City. Honda, an IU, implements several pollution prevention and waste minimization programs.**

	Yes	No
5. Do you have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?		X

   Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION II COMPLETED BY:	**Gregory L. Sanders**	DATE:	1-5-12
TITLE:	**Environmental Specialist**	TELEPHONE:	**614.728.3851**

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CA INFORMATION

1. CA name: **City of Marysville Water Reclamation Facility (WRF)**

2. Original pretreatment program submission approval date: **November 1992**

3. Required frequency of reporting to Approval Authority: **Annual**

4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
City of Marysville WRF	4PE00002 BD	July 1, 2011	June 30, 2016

5. Does the CA have a sludge management plan on file with Ohio EPA?	Yes	No
	X	

If yes, provide the following information.

POTW Name	Date of Plan Approval
City of Marysville	unknown

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM]	November 1992

2. Identify any substantial modifications the CA made in its pretreatment program in the last five years. [403.18]

Date Approved	Name of Modification
1992	Local limits, mod request & SUO
1993	Local limits
1997	Local limits
1998	Local limits & technical justification
2003	Local limits justification
10/16/2003	ERP modification

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:	2. Location address:
City of Marysville WRF	**12901 Beecher Gamble Road Marysville, OH 43040**

3. a. NPDES permit number	b. Expiration date	4. Treatment plant wastewater flows
4PE00002 / OH0136271	**June 30, 2016**	Design **8.0** MGD Actual **3.89** MGD

5. Sewer System	a. Separate %	b. Combined %	c. Number of CSOs
	100	**0**	**0**

6. a. Industrial contribution (MGD)	b. Number of SIUs discharging to plant	c. Percent industrial flow to plant
1.1	**7 SIUs / 2 are Cat** **7**	**% Industrial Flow 28.3 %**

7. Level of treatment		Type of Process(es)
a. Primary		**Raw sewage pumping and fine screens**
b. Secondary		**Carbonaceous and nitrification oxidation, chemical precipitation for phosphorus removal, secondary clarification, aerobic sludge holding, mechanical thickening and centrifuge dewatering**
c. Tertiary		**Ultraviolet light disinfection, post aeration and tertiary filtration**

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**	-	-
b. Organics	**3/wk**	**3/wk**	-	**1/mn**
c. Toxicity testing	-	**1/yr**	-	**1/yr**
d. EP toxicity	-	-	-	-
e. TCLP	-	-	-	-

9. Effluent Discharge

a. Receiving water name	b. Receiving water classification	c. Receiving water use
Mill Creek	**WWH**	**AWS, IWS, PCR**

d. If effluent is discharged to any location other than the receiving water, indicate where. **N/A**

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)]			
b. Has there been a pattern of toxicity demonstrated?			

12. Indicate methods of sludge disposal.

	Quantity of sludge			Quantity of sludge	
a. Land application		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	874	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). **Marysville Codified Ordinance, Title 3 – Public Utilities, Chapters 921, 925, 930, 931 and 937.**

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)]

	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? **Three + another one in future**

List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.

Jurisdiction Name	Number of CIUs	Number of Other SIUs
Milford Center	-	-
Union County – Industrial Parkway	2	1
Honda	1	1
Jerome Village Community in future	-	-

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.).

Marysville Codified Ordinance, Chapter 921.

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.

a. IWS update	X	e. Notification of IUs	X
b. Permit issuance	X	f. Receipt and review of IU reports	
c. Inspection and sampling	X	g. Analysis of samples	
d. Enforcement	X	h. Other (specify)	

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(f)(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	X
• Review of water billing records	X	• Permit application requirements	X
• Review of plumbing/building permits	X	• Citizens involvement	X
		• Other (specify)	

c. How often is the IWS to be updated? **Reviewed annually**

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.).	**IU permit**	
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: **schematic provided w/all IU permit applications**	X	
• Sample type	X	
• Sampling frequency:	X	
• Reporting requirements:	X	
• Notification requirements	X	
• Record keeping requirements **3 years**	X	
e. Statement of applicable civil and criminal penalties: **Ordinance attached to permit**	X	
f. Applicable compliance schedule	N/A	

	N/A	Yes	No
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?		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).

Warner Septic Tank Hauling hauls wastewater from county plants and discharges to old WWTP at isolated tanks. No septage is discharged. New Day Farms once hauled storm water pond wastewater to old WWTP.

G. APPLICATION OF STANDARDS

	Yes	No
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)]	X	

	N/A	Yes	No
2. If there is more than one treatment plant, were local limits established specifically for each plant?			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)] **Oct. 2010**

Partial Technical Evaluation (not all 10 pollutants evaluated)?

	Headworks Analysis Completed?		Scenario Run		Local Limits Amended?		Local Limit (Numeric) (mg/l)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)			X		X		144
b. Cadmium (Cd)			X		X		6.2
c. Chromium (Cr)			X		X		11
d. Copper (Cu)			X		X		-
e. Cyanide (CN)			X		X		0.012
f. Lead (Pb)			X		X		28
g. Mercury (Hg)			X		-		0.012
h. Molybdenum (Mo)			X		X		20,630
i. Nickel (Ni)			X		X		144
j. Selenium(Se)			X		-		5.2
k. Silver (Ag)			X		X		1.3
l. Zinc (Zn)			X		X		325
m.Other (specify): Tl			X		-		9.1

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	1/year	1/year	1/year	1/year
• Other SIUs	1/year	1/year	1/year	1/year
b. Sampling by POTW				
• CIUs	1/year	1/year	1/year	1/year
• Other SIUs	1/year	1/year	1/year	1/year
c. Self-monitoring				
• CIUs	1/mn	2/year	2/year	2/year
• Other SIUs	1/mn	2/year	2/year	2/year
d. Reporting by IU				
• CIUs	1/qtr	2/year	2/year	2/year
• Other SIUs	1/qtr	2/year	2/year	2/year

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT

	Yes	No
1. Does the CA's program define "significant noncompliance"? **Chapter 921.31 (d)**	X	
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	X	

Yes, consistent w/Ohio EPA's definition.

If no, provide the CA's definition of "significant noncompliance."

	Yes	No
2. Does the CA have an approved, written ERP? [403.8(f)(5)] **Yes, last modified 10/16/03.**	X	

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	X	f. Administrative Order	X
b. Compliance schedule	X	g. Revocation of permit	X
c. Injunctive relief	X	h. Fines (maximum amount)	X
d. Imprisonment		• Civil	**$ 500/day/violation**
e. Termination of service	X	• Criminal	**$ 500/day/violation**
		• Administrative	**$ 500/day/violation**

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

	Yes	No
1. Does the approved program describe how the POTW will manage its files and data?		X

2.
Files are kept on computer, backed up regularly, and some kept by hard copy .

Are files/records		computerized?	X	hard copy?	X

	Yes	No
2. Are program records available to the public?	X	
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: **One person (FTE) allocated.**

	FTEs
a. Legal assistance	0.125
b. Permitting	0.125
c. Inspections	0.125
d. Sample collection	0.125
e. Sample analysis	0.125
f. Data analysis, review, and response	0.125
g. Enforcement	0.125
h. Administration?	0.125
TOTAL	1.0

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

a. POTW general operating fund	X	d. Monitoring charges	X
b. IU permit fees	X	e. Other (specify)	
c. Industry surcharges			

L. ADDITIONAL INFORMATION

FOG program started by City which includes a grease trap certification program.

Pretreatment files were very well organized. Quickly able to access information that I needed or requested.

Industrial user permit was very complete and thorough. It contained schematic of sampling outfalls, NOV forms and the City's sewer use ordinance.

Industrial user permits listed in the file for Nestle R&D Center, Inc. and Bulk Transit was expired.

ATTACHMENT B COMPLETED BY:	**Gregory L. Sanders**	DATE:	1-5-12
TITLE:	**Environmental Specialist**	TELEPHONE:	**614.728.3851**