



**Environmental
Protection Agency**

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

Re: Lucas County
Maumee River WWTP
Pretreatment

March 2, 2012

Mr. James P. Shaw III, P.E.
Lucas County Sanitary Engineer
1111 South McCord Road
Holland, Ohio 43528

Dear Mr. Shaw:

On February 17, 2012, Naajy Abdullah conducted a Pretreatment Compliance Inspection (PCI) of the County's approved program. The PCI followed a checklist designed to evaluate the major aspects of the program. Selected industrial user (IU) files were also reviewed. The PCI findings are summarized below:

1. All the sampling and inspections of IUs were conducted as required by the approved pretreatment program.
2. Review of selected IU files indicates proper administration of the permits and enforcement program.

The completed inspection checklist is enclosed for your review. If you have any questions, please contact Naajy Abdullah at naajy.abdullah@epa.state.oh.us or (419) 373-3017.

Yours truly,

Elizabeth A. Wick, P.E.
Environmental Engineer/Section Manager
Division of Surface Water

NA/jlm

Enclosure

pc: Jason Collins, Maumee River WWTP
ec: Ryan Laake, DSW, CO
Inspection Tracking

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
- Attachment A Pretreatment Program Status Update
- Attachment B Pretreatment Program Profile
- Attachment C Worksheets
 - WENDB/ RNC Worksheet (Required)
 - 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>Lucas County Maumee River WWTP</i>	2/17/2012

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
<i>Naajy Abdullah</i>	<i>Environmental Specialist/ Ohio EPA</i>	<i>(419) 373-3017</i>

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
<i>Jason Collins</i> *	<i>Pretreatment Coordinator/ Maumee River WWTP</i>	<i>(419) 213-8745</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	Act
CIU	Code of Federal Regulations
CSO	Categorical Industrial User
CWA	Combined Sewer Overflow
CWF	Clean Water Act
DMR	Combined Wastestream Formula
DSS	Discharge Monitoring Report
EP	Domestic Sewage Study
EPA	Extraction Procedure
ERP	U.S. Environmental Protection Agency
FDF	Enforcement Response Plan
FTE	Fundamentally Different Factors
FWA	Full-Time Equivalent
gpd	Flow-Weighted Average
IU	gallons per day
IWS	Industrial User
MGD	Industrial Waste Survey
MSW	Million Gallons Per Day
N/A	Municipal Solid Waste
ND	Not Applicable
NOV	Not Determined
NPDES	Notice of Violation
O&G	National Pollutant Discharge Elimination System
PCI	Oil and Grease
PCS	Pretreatment Compliance Inspection
PIRT	Permit Compliance System
POTW	Pretreatment Implementation Review Task Force
QA/QC	Publicly Owned Treatment Works
RCRA	Quality Assurance/Quality Control
RNC	Resource Conservation and Recovery Act
SIU	Reportable Noncompliance
SNC	Significant Industrial User
SUO	Significant Noncompliance
TCLP	Sewer Use Ordinance
TOMP	Toxicity Characteristic Leachate Procedure
TRC	Toxic Organic Management Plan
TRE	Technical Review Criteria
TRIS	Technical Review Evaluation
TSDf	Toxics Release Inventory System
TTO	Treatment, Storage, and Disposal Facility
UST	Total Toxic Organics
WENDB	Underground Storage Tank
	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 <u>1</u> Industry name and address <i>Johnson Controls, Inc.</i> <i>10300 Industrial Road</i> <i>Holland, Ohio 43528</i>	Type of industry <i>Battery manufacturing</i>	
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR 461.30.C <input type="checkbox"/> Non-categorical SIU	Average total flow (gpd) 30,622	Average process flow (gpd) 13,545
<input type="checkbox"/> Non SIU	Industry visited during PCI? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

EXPLANATION:

Comments

IU IDENTIFICATION (Continued)

FILE 2 Industry name and address

Moore Metal Finishing
3525 Silica Road
Sylvania, Ohio 43560

Type of industry

Job shop zinc electroplater

IU CLASSIFICATION BY CA:

CIU 40 CFR 433.17
 Non-categorical SIU

Non SIU

Average total flow (gpd)

18,000

Average process flow (gpd)

18,000

Industry visited during PCI? Yes No

COMPLIANCE STATUS

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

EXPLANATION:

Comments

FILE _____ Industry name and address

Type of industry

IU CLASSIFICATION BY CA:

CIU Category(ies)
 Non-categorical SIU

Non SIU

Average total flow (gpd)

Average process flow (gpd)

Industry visited during PCI? Yes No

COMPLIANCE STATUS

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

EXPLANATION:

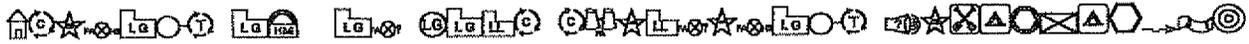
Comments

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

D. CA COMPLIANCE MONITORING

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

Comments:



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

Comments: No Violations

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit 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
<input type="checkbox"/>	<input checked="" type="checkbox"/>

If yes, discuss.

- b. Have you identified any needed changes?

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

If yes, describe.

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

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

*** Water usage records. An IWS is used to enable IU characterization.**

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)

*** Water flow records**

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

C. CONTROL MECHANISM EVALUATION (405.8(f)(1)(ii))					
<p>1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENB-NOCM][RNC-I]</p> <p>If any, explain.</p>	<p>0</p>				
<p>2. a. How many control mechanisms were allowed to expire prior to reissuance?</p> <p>If any, explain.</p>	<p>0</p>				
<p>b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]</p> <p>If any, explain.</p>	<p>0</p>				
<p>c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?</p> <p><i>An IWS with an application.</i></p>	<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="padding: 5px;">Yes</th> <th style="padding: 5px;">No</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; padding: 5px;">X</td> <td style="padding: 5px;"></td> </tr> </tbody> </table>	Yes	No	X	
Yes	No				
X					

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS [403.8(f)(1)(iii)]										
<p>1. a. How and when do you evaluate SIUs for the need to develop slug discharge control plans? (check on CA's definition of slug discharge)</p> <p><i>During the IU annual inspection</i></p>										
<p>b. How many SIUs were evaluated in the past two years?</p>	0									
<p>2. a. Describe any wastes hauled to the POTW.</p> <p style="margin-left: 20px;"><i>N/A</i></p> <p>b. If any IUs have their wastewater hauled to the POTW, how do you ensure all applicable standards (local and categorical) are met?</p> <p>c. List IUs that haul their wastewater to the POTW.</p>										
E. COMPLIANCE MONITORING										
<p>1. In the past 12 months, how many, and what percentage of, SIUs were the following: [403.8(f)(2)(v)][WENB-NOIN][RNC-II] (Define the 12 month period <i>2/1/2011 to 2/1/2012.</i>)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-left: 20px;"> <tbody> <tr> <td style="width: 60%;">a. Not sampled or not inspected at least once [WENDB-NOIN]</td> <td style="width: 20%; text-align: center;">0</td> <td style="width: 20%; text-align: center;">0%</td> </tr> <tr> <td>b. Not sampled at least once</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0%</td> </tr> <tr> <td>c. Not inspected at least once (all parameters)?</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0%</td> </tr> </tbody> </table> <p style="margin-left: 20px;">If any, explain.</p>		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%
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%								
<p>2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or</p> <p style="margin-left: 20px;">sampled (in the four most recent full quarters)? [WENB-SNIN]</p> <p style="margin-left: 20px;">If any, explain.</p>	0									

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT

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

		Yes	No
a.	Notice or letter of violation		X
b.	Administrative Order		X
c.	Administrative fine		X
d.	Show cause hearing		X
e.	Compliance schedule		X
f.	Permit revocation		X
g.	Civil suits		X
h.	Criminal suits		X
i.	Termination of service		X
j.	Other (specify)		X

Explain if appropriate:

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

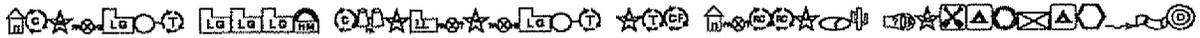
		Yes	No	Explain
a.	Interference		X	
b.	Pass through		X	
c.	Fire or explosions (flashpoint, ect.)		X	
d.	Corrosive structural damage		X	
e.	Flow obstructions		X	
f.	Excessive flow rates		X	
g.	Excessive pollutant concentrations		X	
h.	Heat problems		X	
i.	Interference due to O & G		X	
j.	Toxic fumes		X	
k.	Illicit dumping of hauled wastes		X	
l.	Worker health and safety concerns		X	
m.	Other (specify)			

If yes, how did you respond?

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT (continued)		
	Yes	No
3. Were you made aware of any hazardous waste discharges to the POTW? [403.12(j)&(p)] If yes, explain.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G. GENERAL OBSERVATIONS/ INFORMATION		
	Yes	No
1. Have you had any problems (general or specific) implementing your approved program If yes, explain.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional Comments/Observations/Information:		

SECTION II COMPLETED BY: Naajy Abdullah TITLE: Environmental Specialist	DATE: 2/17/2012 TELEPHONE: (419)373-3017
POTW REPRESENTATIVE Jason Collins PROVIDING RESPONSES:	DATE: 2/17/2012 TELEPHONE: (419)21-38745



SECTION III: EVALUATION AND SUMMARY

INSTRUCTIONS: Based on information and data evaluated, summarize the findings of the audit for each program element shown below. Identify all problems or deficiencies based on the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

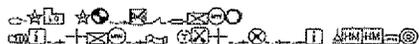
Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> Status of program modifications (Ref. 403.18 /Checklist II.A.1) 		
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements (Ref. 403.8(f)(1))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

Description	Recommended Action	Required Action
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.B.1&2) 	None	None
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.C.1) 	None	None
<ul style="list-style-type: none"> Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.B.2) 	None	None
<ul style="list-style-type: none"> Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.2) 	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.C.1-4) 	None	None
<ul style="list-style-type: none"> Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)) 	None	None
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.D, 2.II.E.1&2) 	None	None
<ul style="list-style-type: none"> Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.D; II.E.1) 	None	None
<ul style="list-style-type: none"> Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.D) 	None	None
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.F) 	None	None
<ul style="list-style-type: none"> Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.F.11,II.F.3) 	None	None



Description	Recommended Action	Required Action
F. COMPLIANCE MONITORING (Continued)		
■ Evaluate the need for SIUs to develop slug discharge control plans (Ref. 403.8(f)(2)(v)/Checklist I.D)	None	None
■ Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&(2);403.8(f)(2)(vi)/Checklist I.F.9)	None	None
G. ENFORCEMENT		
■ Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.E.2)	None	None
■ Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist I.E.4)	None	None
■ Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.E.3)	None	None
■ Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.E ;II.F.1)	None	None



Description	Recommended Action	Required Action
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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.G) 	None	None
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I. RESOURCES

<ul style="list-style-type: none"> Adequate resources (Ref. 403.8(f)(3)/Checklist II.G) 	None	None
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Description	Recommended Action	Required Action
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J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

<ul style="list-style-type: none"> Understanding of pollutants from all sources (Checklist II.G) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness (Checklist II.G) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Integration of pollution prevention (Checklist II.G) 	<i>None</i>	<i>None</i>

K. ADDITIONAL EVALUATIONS/INFORMATION

Empty space for additional evaluations/information
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Description	Recommended Action	Required Action
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SECTION III COMPLETED BY: <i>Naajy Abdullah</i> TITLE: <i>Environmental Specialist</i>	DATE: <i>12/14/2011</i> TELEPHONE: <i>(419)373-3017</i>
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WENDB AND RNC WORKSHEET

PCI/Audit/RI Checklist

FACILITY INFORMATION				
Name Maumee River WWTP	Date of Inspection February 17, 2012			
OH Number OH0034223	NPDES Number 2PK00000*KD			
I. WENDB DATA ENTRY WORKSHEET				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	8	Annual	Annual	SIUS
Number of CIUs	6	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	0	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	0			PSNC
Number of SIUs in SNC with self-monitoring	0			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	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	-	I		
- Failure to submit required reports within 30 days	-	I		
- Failure to meet compliance schedule milestone date within 90 days	-	I		
- Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	-	II	II.C.2.b	II.D.1.b
- Failure to inspect or sample 80% of SIUs within the last 12 months	-	II	II.E.1	II.F.1
- Failure to enforce pretreatment standards and reporting requirements	-	II		I.C.1
- Other (specify)	-	II		
SNC				
- Control Authority in SNC for violation of any Level I criterion	-			
- Control Authority in SNC for violation of two or more Level II criterion	-			