



**Environmental
Protection Agency**

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

February 21, 2012

Mayor and Council
City of Heath
Municipal Building
Heath, OH 43056

**Re: Industrial Pretreatment Compliance Inspection
City of Heath / Licking County
4PC00007*KD / OH0025763**

Dear Mayor and Council:

On January 18 & 19, 2012, Ohio EPA conducted a Pretreatment Compliance Inspection (PCI) of the City of Heath Industrial Pretreatment Program (IPP). Dan Stofan of the City of Heath participated in the PCI. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations. Attached you will find the PCI report.

The major findings of the PCI are as follows:

1. Overall, the City of Heath's IPP has again been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). Mr. Stofan is doing a good job administering the pretreatment program. The City of Heath has submitted the required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in the Heath NPDES permit for the PCI time period.
2. Screening of recent influent, effluent and sludge sampling results at the Heath WWTP have not indicated significant concentrations of pollutants related to industrial user discharges. Biosolids pollutant concentrations have been maintained below U.S. EPA 40 CFR 503 monthly average (clean) levels during the PCI time period.
3. Three effluent violations from Amapacet Corporation and two effluent violations from Kaiser Aluminum, both significant industrial users (SIUs) were identified during the PCI. Heath documented these violations and informed the SIU to conduct an investigation/evaluation to eliminate these violations in the future. The City of Heath took the appropriate action to address the violations.
4. One instance of industrial user significant non-compliance (SNC) occurred during the PCI time period due to pass through/interference from WS Packaging discharging dye to the sanitary sewer. The City of Heath took the appropriate action to address the SNC.

No program deficiencies were identified during the PCI. There are no required actions that are needed by the City of Heath at this time. However, there are several recommended actions by this Agency. These actions include:

1. It is recommended to have industrial user permit applications with every industrial user permit renewal. The industrial user permit renewal should also include a schematic of the facility's utility and production lines.
2. It is recommended to promptly issue new industrial user permits to the industrial users once the local limits evaluation is completed. A signed and dated copy of the permit should be kept in the file.
3. It is recommended to list the penalty and/or fines in the next updated version of the sewer use ordinance and enforcement response plan.

Please acknowledge the receipt of this letter no later than XXXXXXX. Ohio EPA recognizes the continuing commitment demonstrated by the City of Heath, Pretreatment and WWTP staff to implement state and federal pretreatment requirements. The recommended changes to the industrial user permits, if any, can be made when the industrial user permit needs to be renewed. 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,



Gregory L. Sanders
Environmental Specialist
Storm Water Section
Division of Surface Water
Central District Office

Enclosure

c: Jeff Bohne, DSW/CDO
Dave Breener, Superintendent, City of Heath
Dan Stofan, Lab Manager & Pretreatment Coordinator, City of Heath
John Geller, Utilities Director, City of Heath

ec: Greg Sanders, DSW/CDO

GS/nsm 18Jan2012PClcoverletter_Heath



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME City of Heath	PERMIT NUMBER 4PC00007*KD	FACILITY NUMBER OH0025763	
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED January 18 & 19, 2012

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY Heath Wastewater Treatment Plant 718 Lickingview Drive Heath, OH 43056
MAILING ADDRESS OF FACILITY Mayor and Council City of Heath Municipal Building Heath, OH 43056
CONTACT (NAME/TITLE/PHONE) Dan Stofan, Pretreatment Coordinator; 740.522.4807 Heath WWTP, 719 Licking View Drive, Heath, OH 43056

FACILITY EVALUATION													
(S = Satisfactory, M = Marginal, U = Unsatisfactory)													
<table border="1"> <tr> <td>S</td> <td>Pretreatment Compliance Inspection (PCI) Attached</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </table>	S	Pretreatment Compliance Inspection (PCI) Attached					<table border="1"> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </table>						
S	Pretreatment Compliance Inspection (PCI) Attached												

Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders 	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 2-10-12
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 2-10-12

WENDB AND RNC WORKSHEET
PCI/Audit Checklist

FACILITY INFORMATION	
Name City of Heath WWTP	
OH Number 0025763	NPDES Number 4PC00007*KD
Date of Inspection January 18 & 19, 2012	

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	3	II.C.1	SIUS
Number of CIUs	1	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	0	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
<input type="checkbox"/>	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
<input type="checkbox"/>	Failure to submit required reports within 30 days	I	
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days	I	
<input type="checkbox"/>	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
<input type="checkbox"/>	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
<input type="checkbox"/>	Other (specify)	II	
SNC			
<input type="checkbox"/>	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		

CITY OF HEATH PRETREATMENT COMPLIANCE INSPECTION (PCI) CHECKLIST

PCI CHECKLIST CONTENT		
Cover page and Acronym List		
Section I	IU File Evaluation	
Section II	Supplemental Data Review/Interview	
Section III	Evaluation and Summary	
<u> </u> Attachment A	Pretreatment Program Status Update	
<u>X</u> Attachment B	Pretreatment Program Profile	
<u>X</u> Attachment C	Worksheets	
	<u>X</u>	WENDB/ PNC Worksheet (Required)
	<u> </u>	IU Site Visit Report Form (Required)
	<u>X</u>	File Review Worksheets (Required)
Attachment D	Supporting Documentation _____	
Control Authority (CA) name and address		Date(s) of PAI
City of Heath 718 Lickingview Drive Heath, OH 43056		January 18 & 19, 2012
INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number
Greg Sanders		614.728.3851
CA REPRESENTATIVE(S)		
John Geller	Utilities Director, City of Heath	740.522.1677
David Brenner	Superintendent, City of Heath	740.522.4802
Dan Stofan	Pretreatment Coordinator, City of Heath	740.522.4807

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.

SECTION I: IU FILE EVALUATION

FILE 1 Industry name and address

Heath-Newark-Licking County Port Authority
813 Irving Wick Drive
Heath, Ohio 43057

Type of industry

Aeronautical systems facility w/restaurant,
daycare and recreation center

SIC 3812, 8999

IU CLASSIFICATION BY CA:

Non-Categorical Significant Industrial user

Average total flow (gpd)

32,490

Average process flow (gpd)

11,390

Industry visited during PCI? No

COMPLIANCE STATUS

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

EXPLANATION: No violations for 2009 through 2011.

Comments

David Handley Environmental/Safety Coordinator; 740.788.5500

Rick Platt, Director; 740.788.5500 ext. 35

870 employees listed in IU permit application. 3 shifts per day.

IU Permit, HNLCPA-07A, effective 10-8-07, and originally expired 9-30-11, but extended until 2-1-12, by letter dated 9-21-11. SIU with local limits and quarterly reporting.

Outfall - lift station to city sewer located northwest corner of facility's property.

Pollutants of concern are asbestos, beryllium, chromium, copper, lead, mercury, nickel, silver, zinc & toluene. Raw materials used include paints, inks, solvents, sodium chromate and detergents.

Wastewater flows; domestic - 21,100 gpd, boiler/blowdown - 10,390 gpd, water softener - 1,000 gpd; 32,490 gpd

SPCC plan dated 7-18-00 in files.

Grease trap on-site.

Uses Pace Analytical Services, Inc.

City of Heath is working with HLNCPA for relocating sanitary sewers and installing sampling ports.

Control authority, City of Heath, conducted an inspection on 10-27-11 and 10-19-10.

City of Heath sampled HLNCPA on 12-15-11, 8-3-11, 6-23-11, 3-3-11, 12-9-10, 8-12-10, 6-17-10, 3-18-10, 12-9-09.

SECTION I: IU FILE EVALUATION (Continued)

FILE 1 cont. Industry name and address
 Heath-Newark-Licking County Port Authority
 813 Irving Wick Drive
 Heath, Ohio 43057

Type of industry
 Aeronautical systems facility w/restaurant,
 daycare and recreation center
 SIC 3812, 8999

Comments

IU permit is as follows:

Parameter	daily maximum ug/l	frequency	type
Flow	monitor	1/day	cont.
pH	6.5-9.0	1/day	grab
BOD5	monitor	1/qtr	24 hr comp
TSS	monitor	1/qtr	24 hr comp
MBAS	5	1/qtr	24 hr comp
O&G	100,000	1/qtr	grab
Phenols	250	1/qtr	24 hr comp
Ar	monitor	1/qtr	24 hr comp
Be	monitor	1/qtr	24 hr comp
Cd	20	1/qtr	24 hr comp
Cr, Total	2600	1/qtr	24 hr comp
Cr+6	monitor	1/qtr	grab
Cu	650	1/qtr	24 hr comp
Cy	50	1/qtr	grab
Pb	500	1/qtr	24 hr comp
Hg	0.2	1/qtr	24 hr comp
Mo	900	1/qtr	24 hr comp
Ni	900	1/qtr	24 hr comp
Se	monitor	1/qtr	24 hr comp
Zn	1300	1/qtr	24 hr comp
Priority Pollutants	monitor	1 /yr - 2 nd qtr	grab

Self-monitoring by IU, HNLPA, conducted on 10-19-11, 8-10-11, 4-20-11, 2-9-11, 10-27-10, 8-11-10, 5-20-10, 1-27-10.

SECTION I: IU FILE EVALUATION (Continued)

FILE <u> 2 </u> Industry name and address AMPACET Corporation 1855 James Parkway Heath, OH 43026	Type of industry Plastic colorants, additives SIC 3087	
IU CLASSIFICATION BY CA: Non-Categorical Significant Industrial User	Average total flow (gpd) <p align="center">5,100</p>	Average process flow (gpd): <p align="center">5,100</p>
	Industry visited during PCI? No	

COMPLIANCE STATUS

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

EXPLANATION: See violations listed below.

Comments

David Brockman; 740.929.5521 x 132

Three shifts & 24 people per shift.

IU Permit, effective 10-1-07 and originally expired 9-30-11, but extended until 2-1-12, by letter dated 9-21-11. IU permit application dated 7-24-06. SIU with local limits and quarterly reporting.

Outfall - effluent monitoring manhole at southeast corner of building.

Pollutants of concern are antimony, arsenic, bis 2 ethylhexyl phthalate, cadmium, chromium, copper, lead, nickel, phenols, zinc & toluene.

Wastewater flows (gpd); plastic extrusion-3,000, boiler/blowdown-600, NCCW-500, washdown-1,000; 5,100 gpd

SPCC plan on file.

E-mails and phone calls documented in the file.

Uses Test America for laboratory sampling.

Compliance schedule with orders to install pretreatment system issued on 6-7-11.

Biological pretreatment system installed on 8-21-11, consisting of coagulation, settling and filtering.

Control authority, City of Heath, conducted an inspection on 9-29-11 and 10-25-10.

City of Heath sampled on 12-14-11, 8-3-11, 6-23-11, 3-3-11, 12-9-10, 8-12-10, 6-17-10, 3-25-10 and 12-9-09.

NOV issued by City of Heath on 7-28-11 for Cy violations on 5-3-11 and 6-16-11.

NOV issued by City of Heath on 1-4-11 for 12-9-10 Cu violation and Zn violation (TSS surcharge).

AMPACET submitted Copper Reduction Evaluation plan in December 2009.

SECTION I: IU FILE EVALUATION (Continued)

FILE <u>2 cont.</u> Industry name and address AMPACET Corporation 1855 James Parkway Heath, OH 43026	Type of industry Plastic colorants, additives SIC 3087
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Comments

IU permit is as follows:

Parameter	daily maximum ug/l	frequency	type
Flow	monitor	1/day	cont.
pH	6.5-9.0	1/day	grab
BOD5	monitor	1/qtr	24 hr comp
TSS	monitor	1/qtr	24 hr comp
Bis 2-Phthalate	monitor	1/qtr	24 hr comp
MBAS	5	1/qtr	24 hr comp
O&G	100,000	1/qtr	grab
Phenols	monitor	1/qtr	grab
P	monitor	1/qtr	24 hr comp
Ag	140	1/qtr	24 hr comp
Ar	monitor	1/qtr	24 hr comp
Cd	20	1/qtr	24 hr comp
Cr, Total	2600	1/qtr	24 hr comp
Cr+6	260	1/qtr	grab
Cu	650	1/qtr	24 hr comp
Cy	50	1/qtr	grab
Pb	310	1/qtr	24 hr comp
Hg	1	1/qtr	24 hr comp
Mo	3500	1/qtr	24 hr comp
Ni	900	1/qtr	24 hr comp
Se	130	1/qtr	24 hr comp
Zn	1300	1/qtr	24 hr comp
Priority Pollutants	monitor	1 /yr - 2 nd qtr	grab

Self-monitoring by IU, AMPACET, on 11-11-11, 8-26-11, 5-3-11, 2-2-11, 1-14-11, 10-7-10, 8-25-10, 4-8-10 and 1-6-10.

SECTION I: IU IDENTIFICATION (Continued)

FILE 3 Industry name and address
Kaiser Aluminum and Chemical Corporation
1459 Heath Road
Heath, OH 43056

Type of industry
Aluminum extrusion/forming mfg.
SIC #3341 & 3354

IU CLASSIFICATION BY CA:

 CIU 467 Aluminum forming
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd) 113,559	Average process flow (gpd) 113,559
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

EXPLANATION: Only one violation during PCI time period.

Comments:
Denny Hess, Plant Manager; 740.552.0436

IU Permit, effective 10-1-07 and originally expired 9-30-11, but extended until 2-1-12, by letter dated 9-21-11. CIU with combined categorical and local limits and quarterly reporting.

Outfall - effluent monitoring manhole at southeast corner of building.

Pollutants of concern are asbestos, beryllium, chromium, copper, lead, mercury, nickel and zinc.

Wastewater flows (gpd); casting and extrusion 113,559 gpd.

SPCC plan on file dated 3-15-00.

E-mails and phone calls documented in the file.

Uses Test America for laboratory sampling.

Pretreatment system consists of flocculation, coagulation, clarification, filtering and cooling.

Control authority, City of Heath, conducted an inspection on 9-21-11 and 10-27-10.

City of Heath sampled on 12-15-11, 8-3-11, 6-23-11, 3-3-11, 12-9-10, 8-12-10, 6-17-10, 3-18-10 and 12-9-09.

NOV Issued by City of Heath on 7-28-11 for Hg violation on 6-23-11 and 6-2-11.

FILE 3 con't. Industry name and address	Type of industry
Kaiser Aluminum and Chemical Corporation 1459 Heath Road Heath, OH 43056	Aluminum extrusion/forming mfg. SIC #3341 & 3354

Comments

IU permit is as follows:

Parameter	daily maximum ug/l	frequency	type
Flow	monitor	1/day	cont.
pH	6.5-9.0	1/day	grab
BOD5	monitor	1/qtr	24 hr comp
TSS	monitor	1/qtr	24 hr comp
Bis 2-Phthalate	monitor	1/qtr	24 hr comp
MBAS	5	1/qtr	24 hr comp
O&G	60,000	1/qtr	grab
Phenols	monitor	1/qtr	grab
P	monitor	1/qtr	24 hr comp
Ag	140	1/qtr	24 hr comp
Ar	monitor	1/qtr	24 hr comp
Cd	20	1/qtr	24 hr comp
Cr _{Total}	450	1/qtr	24 hr comp
Cr+6	260	1/qtr	grab
Cu	650	1/qtr	24 hr comp
Cy	50	1/qtr	grab
Pb	310	1/qtr	24 hr comp
Hg	1	1/qtr	24 hr comp
Mo	3500	1/qtr	24 hr comp
Ni	900	1/qtr	24 hr comp
Se	130	1/qtr	24 hr comp
Zn	1300	1/qtr	24 hr comp
Priority Pollutants	monitor	1 /yr - 2 nd qtr	grab

Self-monitoring by IU, Kaiser, on 9-7-11, 6-3-11, 3-4-11, 12-10-10, 9-3-10, 6-2-10, 3-3-10 and 12-2-09.

SECTION I: IU FILE EVALUATION (Continued)

FILE <u>4</u> Industry name and address WS Packaging 1720 James Parkway Heath, OH 43056	Type of industry Printing plant using pressure sensitive labels	
IU CLASSIFICATION BY CA: Industrial User	Average total flow (gpd) 350	Average process flow (gpd) 0
Industry visited during PCI? No		

COMPLIANCE STATUS

SNC (period: October 10, 2010) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION: See violations listed below.

Comments

Brad Mann, Plant manager; 740.929.2210
Chuck Hall, Maintenance technician

Three shifts & 8 people per shift. Facility has been in operation since 9-23-91.

IU permit, effective 8-1-10 and expires on 8-30-14. Wastewater survey in file is not signed/dated by applicant. Survey includes outfall schematic and MSDS sheets.

Outfall – external sampling station in front of office building. Letter dated 1-28-11 from WS Packaging stated external sampling station installed per City’s request.

Raw materials consist of paper and ink.

Wastewater flows (gpd); 350 gpd domestic; process wastewater is collected and hauled off site in drums by Environmental Specialists of Columbus. Hauling records on file with City of Heath.

E-mails and phone calls documented in the file.

Uses US Labs Services for laboratory sampling.

Control authority, City of Heath, conducted an inspection on 10-28-10 with the Ohio EPA.

City of Heath sampled on 12-9-10. Flow has been too low since 2010 to properly sample.

NOV issued by City of Heath on 10-18-10 for WS Packaging discharging dye to sanitary sewer on 10-11-10. The dye caused WWTP interference and pass-through. WS Packaging was in SNC and NOV published in newspaper on 11-24-10.

Self-monitoring by IU, WS Packaging, on 7-30-09, 4-28-09, 2-10-09, 12-09-08 and 1-27-06.

WS Packaging submitted Waste Management Minimization Plan in dated 12-2-10.

IU permit is as follows:

Parameter	daily maximum ug/l	frequency	type
Flow	monitor	1/qtr	cont.
pH	6.5-9.0	1/qtr	grab
Priority Pollutants	monitor	1 /yr – 2 nd qtr	grab

SECTION I: IU FILE EVALUATION (Continued)

FILE 5 Industry name and address
Polymer Technology & Services
1835 James Parkway
Heath, OH 43056

Type of industry
Plastics manufacturing

IU CLASSIFICATION BY CA:
Industrial User

Average total flow (gpd)	Average process flow (gpd)
1,515	0

Industry visited during PCI? **No**

COMPLIANCE STATUS

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

EXPLANATION: **See non-compliance below.**

Comments

On 10-24-11, interference by beads when trying to obtain sample by City of Heath.

Also, pump was down and there was no back-up pump. PTS worked with City to remove beads from outfall and order back-up pump.

SECTION I: IU FILE EVALUATION (Continued)

FILE 6 Industry name and address
Samuel Strapping
1455 James Parkway
Heath, OH 43056

Type of industry
Manufacturers metal strapping
SIC #3499

IU CLASSIFICATION BY CA:
Industrial User

Average total flow (gpd)	Average process flow (gpd)
	0

Industry visited during PCI? **No**

COMPLIANCE STATUS

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

EXPLANATION: **See non-compliance below.**

Comments

Edward Ratliff 740.522.2512

Raw materials used include cold rolled steel, water-based paint, lead and wax.

SPCC plan on file.

Wastewater flows (gpd); cooling blowdown-1,400; cooling water bath-15; coil paint ultrafiltration-100; 1,515 gpd

All process flows hauled off-site by Crystal Clean.

Control authority, City of Heath, conducted an inspection on 10-6-11 and 6-14-07.

Industry Name					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.	Reg. Cite
Port Authority	Ampacet	Kaiser Aluminum	File	File		
File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	
					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	1	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)
X	X	X			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	
X	X	X			- Application of limits for all categorical pollutants	
X	X	X			- Application of TTO or TOMP alternative	
N/A	N/A	X			- Calculation and application of production-based standards	403.6
N/A	N/A	X			- Calculation and application of CWF or FWA	403.6(d)&(e)
X	X	X			• Application of applicable local limits	
N/A	N/A	X			• Application of most stringent limit	403.8(f)(1)(ii)
Comments						
1 – IU permits expired on 9-30-11, but letter dated 9-21-11, extended IU permits until 2-1-12. Please re-issue another letter extending IU permits or re-issue a new IU permit to each entity. It is understandable to wait for the local limits evaluation to be completed prior to re-issuance of the IU permits.						

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	
X	X	X			• Sampling locations/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)
X	X	X			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
N/A	N/A	N/A			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

No deficiencies noted.

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
2	2	2			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

2 – Chain of custody forms are copies in the pretreatment files, however, original chain of custody forms kept in lab files.

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	
					• 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)	
N/A	N/A	N/A			-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
N/A	X	N/A			-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
N/A	X	N/A			-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
					c. Compliance schedule violations	
N/A	X	N/A			• Start-up/final compliance	
N/A	X	N/A			• Interim dates	
Comments						
No deficiencies noted.						

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES (Continued)	
					2. Proper calculation of SNC	403.8(f)(2)(vii)
N/A	N/A	N/A			a. Chronic	
N/A	N/A	N/A			b. TRC	
N/A	N/A	N/A			c. Pass through/interference	
N/A	N/A	N/A			d. Spill/slug load	
N/A	N/A	N/A			e. Reporting	
N/A	N/A	N/A			f. Compliance schedule	
N/A	N/A	N/A			g. Other violations (specify)	
					3. Adherence to approved ERP	
N/A	N/A	N/A			a. Proper response to violation	403.8(f)(5)
N/A	N/A	N/A			b. Escalation of enforcement	403.8(f)(5)
					4. Return to compliance	
N/A	N/A	N/A			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	N/A			5. Publication for SNC	403.8(f)(2)(vii)
					D. OTHER	

Comments

Files well organized and maintained at time of PCI inspection. File documentation and record keeping well managed.

Kaiser Aluminium is Categorical SIU, AMPACET and HNLCPA are SIUs, WS Packaging and Ashland Inc. are IUs and Samuel Strapping is a Non-Significant Categorical IU.

NOV issued by City of Heath on 10-18-10 for WS Packaging discharging dye to sanitary sewer on 10-11-10. The dye caused WWTP interference and pass-through. WS Packaging was in SNC and City of Heath published NOV in newspaper on 11-24-10.

SECTION I COMPLETED BY:	Gregory L. Sanders <i>gls</i>	DATE:	2-10-12
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.) **The last 18 months of plant upgrades had left little time for FOG program inspections. Plan to start back on FOG inspections soon.**

b. Have you identified any needed changes in your program?
If yes, describe.

Yes	No
	X

B. LEGAL AUTHORITY [403.8(1)]

1. Are there any contributing jurisdictions discharging wastewater to the POTW?
If yes, explain how these multi-jurisdictional agreements have been incorporated into your approved program. **Not presently.**

Yes	No
	X

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

Yes	No
	X

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

1. Have you changed how SIUs are classified? **No.**

2. a. How do you identify and classify new IUs? (i.e., Industrial Waste Survey); **by IWS, updated in 2010. Included Samuel Strapping in IU inspections.**

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

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

1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing, unexpired permit, or other individual control mechanism? [WENDB-NOCM] [RNC-II]	Number	Percent
	0	0%

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. **Three current IU permits were about to expire, but renewed by letter from the City of Heath. This was done so that they could complete their local limits evaluation that is expected to be completed in July 2012.**

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:

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

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

Accept waste by truck, from AEP's wash bays, but very little flow.

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)]

Testing prior to dumping, no isolation due to one hauler and low concentrated waste stream.

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)]

Generally just surcharge trucked waste.

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)]

OWEA, OTCO, continuing education credits for lab license and operator's license.

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? (e.g., conventionals, organics, etc.)		X

If yes, how has this been addressed?

Next local limit evaluation to be done by July 2012.

3. What problems, if any, were raised during local limit implementation or reissuance of industrial permits? How were these problems addressed? **None.**

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 12 month period; **11-1-09 through 12-31-11**)

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

	0 %

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

2. Who performs your compliance sampling and analysis?

- Metals
- Cyanide
- Organics
- Conventionals
- Other (specify)

Sampling	Analysis
Heath	American Analytical

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)]

QA/QC done on 10% of samples by using splits, blanks & spikes. Not done recently on WS Packaging, due to the fact that the flow is too low to conduct sampling.

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)]

Done every inspection.

b. How many SIUs were evaluated for the need to develop slug discharge control plans in the last 2 years?

all

G. ENFORCEMENT

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

	Yes	No	Problem
• Interference	X		TSS (dye) issues from WS Packaging
• Pass through	X		Color pass through (dye) from WS Packaging
• 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:

Issued SNC and published NOV in newspaper. Required WS Packaging to create a Waste Management Minimization Plan and install an external sampling station.

b. Were you made aware of any hazardous waste discharges to the POTW?

Yes	No
	X

If yes, explain.

2. a. Do you use compliance schedules? [403.8(f)(1)(iv)(A)]

Yes	No
X	

b. If yes, are they appropriate? Provide examples.

AMPACET had compliance schedule to install pretreatment system with deadline of March 2011. Re-issued compliance orders due to failure to meet original deadline. AMPACET met final deadline and completed installation of pretreatment system.

G. ENFORCEMENT (Continued)

3. ERP implementation: [403.8(f)(5)] **ERP located in Codified Ordinance, Section 933.13.**
- a. Date of last modification: **June 7, 1999. Draft in 2010, but not final yet.**
 - 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.
No issues with ERP at this time.

H. DATA MANAGEMENT/TUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14] **case by case**
2. How are requests by the public to review pretreatment files handled (including confidential information)?
No written policy – case by case decided by Utilities Director.
3. a. Describe your data management system regarding pretreatment implementation and enforcement activities.
(e.g., computerization, file system, etc.)
Hard copy of lab results and IU information and computerized reports.
- b. How long are records maintained? [403.12(o)] **hard copy & bench sheets kept 5 yrs; electronic copies keep indefinitely. New and better back-up system implemented.**
4. How do you ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]
All changes done by council readings (two) and at council meetings.
5. Explain any community issues impacting the pretreatment program.(I. e., economics, politics, new development, etc.)
Economy.

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]. **5 staff available part-time, however, mostly just use Dan Stofan and Jack Brown part-time.**
- | Yes | No |
|----------|----|
| X | |
2. Do you have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)
If no, explain.
3. Discuss any problems in program implementation which appear to be related to inadequate resources. (i.e., finances, equipment, personnel, training, etc.) **None**

I. 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?) **Yes, they compile data and have evaluated trends since 2000. Trend is less flow & concentration since 2000.**

Discuss on pollutant-by-pollutant basis.

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)?

Yes	No
	X

If yes, what was found?

3. a. Have you implement any kind of public education program?
b. Are there any plans to initiate a program to educate users about pollution prevention?

Yes	No
X	
X	

Explain. **Heath WWTP staff offer education on industrial pretreatment and FOG program. They have created booklet and have met with SIU employees. They also have manuals on-line.**

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**

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

5. Do you have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes	No
	X

Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

FOG program is helping remove oil and grease from sanitary sewer.

SECTION II COMPLETED BY: Gregory L. Sanders <i>GLS</i>	DATE: <i>2-10-12</i>
TITLE: Environmental Specialist	TELEPHONE: 614.728.3851

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 Heath WWTP**
2. Original pretreatment program submission approval date: **June 6, 1988**
3. Required frequency of reporting to Approval Authority: **Quarterly and Annual Reports**
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
Heath WWTP	4PC00007*ED	6-1-11	7-31-16

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 Heath WWTP	January 10, 1989

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM] **August 22, 1985**
4PC00007*ED
2. Identify any substantial modifications the CA made in its pretreatment program in the last five years. [403.18]

Date Approved	Name of Modification
June 6, 1988	Pretreatment program approved
3/12/91	Ordinance
11/04/91	Enforcement Response Plan
9/16/93	SIU list
9/21/93	Local Limits
9/17/96	Local Limits
3/3/00	Ordinance
10/20/02	Local Limits
12/2006	Local Limits

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: City of Heath	2. Location address: 719 Licking View Drive Heath, OH 43056
--	---

3. a. NPDES permit number 4PC00007*KD / OH0025763	b. Expiration date 7-13-16	4. Treatment plant wastewater flows	
		Design	MGD
		1.75	1.472
		MGD	MGD

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

6. a. Industrial contribution (MGD) 0.1	b. Number of SIUs discharging to plant 2 SIUs & 1 CIU	c. Percent industrial flow to plant	% Non-domestic Flow	% Industrial Flow 6.8 %
	3			

7. Level of treatment	Type of Process(es)
a. Primary	Bar screen, grit & scum removal
b. Secondary	Activated sludge extended-aeration, secondary clarification, sand filters, aerobic digestion
c. Tertiary	Post aeration, chlorination & dechlorination

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/mn	1/qtr	2/yr	1/qtr
b. Organics	3/wk	3/wk	2/yr	1/mn
c. Toxicity testing	-	1/yr	-	1/yr
d. EP toxicity	-	1/yr	-	1/yr
e. TCLP	-	-	-	-

9. Effluent Discharge

a. Receiving water name South Fork Licking River	b. Receiving water classification WWH	c. Receiving water use AWS, IWS & PCR
--	---	---

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

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)] Last testing done 9-09-09.		X	
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]		X	
b. Has there been a pattern of toxicity demonstrated? reasonable potential			X

12. Indicate methods of sludge disposal.

Quantity of sludge		Quantity of sludge	
a. Land application	191.3 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	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).
Codified Ordinance, Section 933

b. Date enacted/adopted: ----- c. Date of most recent revisions - **currently being updated**

2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(i-vii)] **SUO - 5-6-2005**

	Yes	No
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)]	X	
b. Require compliance with standards [403.8(f)(1)(ii)]	X	
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]	X	
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]	X	
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]	X	
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]	X	
g. Comply with confidentiality requirements [403.8(f)(1)(vii)]	X	

3. a. How many contributing jurisdictions are there? **none**

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

Jurisdiction Name	Number of CIUs	Number of Other SIUs
N/A		

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
	N/A

If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform. **N/A**

a. IWS update		e. Notification of IUs	
b. Permit issuance		f. Receipt and review of IU reports	
c. Inspection and sampling		g. Analysis of samples	
d. Enforcement		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?

Every 5 years

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(f)(1)]

Yes	No
X	

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

F. CONTROL MECHANISM			
1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).		4 years or recent NPDES cycle	
b. What is the maximum term of the control mechanism?		5 years	
2. Does the approved control mechanism include the following? [403.8(f)(1)(ii)]		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:		X	
• Sample type		X	
• Sampling frequency:		X	
• Reporting requirements:		X	
• Notification requirements		X	
• Record keeping requirements		X	
e. Statement of applicable civil and criminal penalties:		X	
f. Applicable compliance schedule		X	
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?	N/A	Yes	No
		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).			
Trucked waste discharges to headworks about 2/yr by AEP wash bays. Low concentrated wash water and very little flow.			
G. APPLICATION OF STANDARDS			
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)] IU Permit		Yes	No
		X	
2. If there is more than one treatment plant, were local limits established specifically for each plant?	N/A	Yes	No
	X		

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(e)(1); 403.8(f)(1)]

Dec.
2006

Partial Technical Evaluation (not all 10 pollutants evaluated)?

	Pollutant Analysis Completed?		Technically Evaluated?		Local Limits Proposed?		Local Limit (Numeric) (ug/l)
	Yes	No	Yes	No	Yes	No	
	a. Arsenic (As)			X		X	
b. Cadmium (Cd)			X		X		20
c. Chromium (Cr) (+6)			X		X		260
d. Copper (Cu)			X		X		650
e. Cyanide (CN)			X		X		50
f. Lead (Pb)			X		X		310
g. Mercury (Hg)			X		X		1
h. Molybdenum (Mo)			X		X		3500
i. Nickel (Ni)			X		X		900
j. Selenium (Se)			X		X		130
k. Silver (Ag)							140
l. Zinc (Zn)			X		X		1300
m. Other (specify): O&G			X		X		100

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/yr	1/yr	1/yr	1/yr
• Other SIUs	1/yr	1/yr	1/yr	1/yr
b. Sampling by POTW				
• CIUs	1/qtr	1/yr	1/yr	1/yr
• Other SIUs	1/qtr	1/yr	1/yr	1/yr
c. Self-monitoring				
• CIUs	1/qtr	1/qtr	1/qtr	2/yr
• Other SIUs	1/qtr	1/qtr	1/qtr	2/yr

I. ENFORCEMENT

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

If no, provide the CA's definition of "significant noncompliance." **N/A**

	Yes	No
2. Does the CA have an approved, written ERP? [403.8(f)(5)] last updated June 7, 1999; currently reviewing to update in future.	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	<input checked="" type="checkbox"/>	f. Administrative Order	<input checked="" type="checkbox"/>
b. Compliance schedule	<input checked="" type="checkbox"/>	g. Revocation of permit	<input checked="" type="checkbox"/>
c. Injunctive relief	<input checked="" type="checkbox"/>	h. Fines (maximum amount)	<input checked="" type="checkbox"/>
d. Imprisonment	<input type="checkbox"/>	• Civil	\$100/day/violation
e. Termination of service	<input checked="" type="checkbox"/>	• Criminal	\$1,000/day/violation
		• Administrative	\$1,000/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	

Are files/records	<input type="checkbox"/>	computerized?	<input checked="" type="checkbox"/>	hard copy?	<input checked="" type="checkbox"/>
-------------------	--------------------------	---------------	-------------------------------------	------------	-------------------------------------

	Yes	No
2. Are program records available to the public? Case by case	X	
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)] Case by case		X

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components:

	FTEs
a. Legal assistance	
b. Permitting	
c. Inspections	1.0
d. Sample collection	1.0
e. Sample analysis	1.0
f. Data analysis, review, and response	1.0
g. Enforcement	0.5
h. Administration?	0.5
TOTAL	5.0

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

a. POTW general operating fund	<input checked="" type="checkbox"/>	d. Monitoring charges	<input type="checkbox"/>
b. IU permit fees	<input type="checkbox"/>	e. Other (specify)	<input type="checkbox"/>
c. Industry surcharges	<input type="checkbox"/>		

L. ADDITIONAL INFORMATION

Recommend listing penalty/fines in the next updated version of the SUO and ERP.

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders <i>GLS</i>	DATE:	<i>2-10-12</i>
TITLE:	Environmental Specialist	TELEPHONE:	614.728.3851

SECTION III: EVALUATION AND SUMMARY

INSTRUCTIONS: Based on the information and data collected and evaluated during Section I File Review and Section II Data Review/Interview identify program deficiencies. Specify required actions (including program modifications) the CA needs to implement to meet regulatory requirements.

PROGRAM AREA	DEFICIENCIES and <i>REQUIRED ACTIONS</i>
IU Characterization	<ul style="list-style-type: none"> • No deficiencies noted. (See Application of Pretreatment Standards below).
Control Mechanism	<ul style="list-style-type: none"> • No deficiencies noted.
Application of Pretreatment Standards	<p>Interview and file review indicated CA ensure that significant industrial users are evaluated at a frequency to ensure compliance with pretreatment standards and requirements. No deficiencies noted.</p> <p>Heath 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 Heath Industrial Pretreatment Program Annual Report.</p> <p>CA must continue to periodically monitor (sample and/or inspect) non-significant industrial users at a frequency to ensure compliance with pretreatment standards and requirements. It is recommended that non-significant industrial users are monitored at a minimum once every 36 months (3 years). Updated information must be kept in the industrial user files. In addition, it is recommended that the General Permit activities for food service establishments (FSE) continue. Included would be a permit update (reissuance or renewal) for existing FSEs. Re-issue IU permits after local limits evaluation is completed.</p>
Compliance Monitoring	<p>File review indicated that the CA conducted industrial user inspections and sampling are required frequencies. No deficiencies notes.</p> <p>CA must continue to 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.</p>
Enforcement Activities	<p>No instances of SIU SNC, however one instance of IU causing interference & pass-through.</p>
Program Modifications	<p>No deficiencies noted. Local limits evaluation and ERP update pending.</p>