



**Environmental
Protection Agency**

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

February 21, 2012

Mayor and Council
City of Delaware
Municipal Building
Delaware, OH 43015

**Re: Industrial Pretreatment Compliance Inspection, January 10 & 11, 2012
City of Delaware, Delaware County
Upper Olentangy Water Reclamation Facility (WRF) 4PD00004*MD / OH0024911**

Ladies and Gentlemen:

On January 10 & 11, 2012, I conducted a Pretreatment Compliance Inspection (PCI) of the City of Delaware's Industrial Pretreatment Program (IPP). During the first day of the PCI, I interviewed Bill Simpson, pretreatment coordinator and Ron Broyles of the City. 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. Simpson. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the Delaware 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 Delaware's IPP has again been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). Mr. Simpson is doing a good job administering the pretreatment program. There were two documented episodes that could have been attributed to industrial users causing the City's WWTP to violate their NPDES permit.
2. The City of Delaware 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 December 1, 2009 through December 31, 2011. The program files were well organized.
3. No reportable non-compliance (RNC) was identified during the PCI. Industrial user self-monitoring and Delaware independent user sampling have been or will be conducted according to program requirements for the PCI time period.

There are two required actions that are needed by the City of Delaware at this time.

1. Issue notice of violations or letters of violation to industrial users for not submitting required self-monitoring reports. Quala Wash Holdings did not submit a report for July 2011.
2. Update the enforcement response plan (ERP) in order to make it more stringent and possibly the fines more costly. The ERP was last updated in 1991.

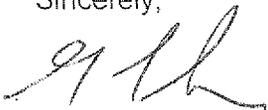
The recommended actions by the Agency from the last inspection have been addressed and implemented by the City of Delaware. No program deficiencies were identified during the PCI. Please continue to:

1. Conduct sampling and inspections in different months each year, as recommended. It is understood that the industrial user permit may need to be revised in order to make this change.
2. Insure the pretreatment survey questionnaires are adequately completed. Question large discrepancies between city water used and wastewater flows discharged. PPG's questionnaire has a large discrepancy.
3. Request a storm water pollution prevention plan (SWP3) and spill prevention, control and countermeasure plan (SPCC) from each industrial user.
4. Please be aware that your ordinance lists that a significant industrial user is in significant non-compliance (SNC) for submitting a monitoring report more than 45 days late. Quala Wash Holdings appeared to have several instances of submitting late reports.
5. 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.
6. 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 Delaware Industrial Pretreatment Program Annual Report.
7. 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 30, 2012.

Ohio EPA recognizes the continuing commitment demonstrated by the Chairman and Council, Delaware 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 Delaware PCI Forms

c: Ryan Laake, DSW/CO
ec: Greg Sanders, DSW/CDO



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME City of Delaware WRF	PERMIT NUMBER 4PD00004*MD	FACILITY NUMBER OH0024911
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1
		DATE CONDUCTED January 10 & 11, 2012

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
 City of Delaware
 Upper Olentangy Water Reclamation Facility
 225 Cherry Street
 Delaware, OH 43015

MAILING ADDRESS OF FACILITY
 Mayor and Council
 City of Delaware
 Municipal Building
 Delaware, OH 43015

CONTACT (NAME/TITLE/PHONE)
 Brad Stanton, Wastewater Manager; 740.203.1952, bstanton@delawareohio.net
 Greg Doubikin, Assistant Wastewater Manager; 740.393.9605, gdoubikin@delawareohio.net
 Bill Simpson, Pretreatment Coordinator; 740.203.1953, wsimpson@delawareohio.net

FACILITY EVALUATION

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

S	Pretreatment Compliance Inspection (PCI)		
	Report attached		
	Inspection period; 12/01/2009 through 12/31/2011		

Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders 	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 2-14-12
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 2-14-12

WENDB AND RNC WORKSHEET PCI Checklist

FACILITY INFORMATION	
Name City of Delaware UOWRF	
OH Number OH0024911	NPDES Number 4PD00004*MD
Date of Inspection January 10 & 11, 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	5	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	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		

CITY OF DELAWARE PRETREATMENT COMPLIANCE INSPECTION (PCI) 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	
<input type="checkbox"/> Attachment A	Pretreatment Program Status Update	
<input checked="" type="checkbox"/> Attachment B	Pretreatment Program Profile	
<input checked="" type="checkbox"/> Attachment C	Worksheets	
	<input checked="" type="checkbox"/>	WENDB/ RNC Worksheet (Required)
	<input checked="" type="checkbox"/>	File Review Worksheets (Required)
Attachment D	Supporting Documentation _____	
Control Authority (CA) name and address		Date(s) of PCI
City of Delaware Upper Olentangy Water Reclamation Center 225 Cherry Street Delaware, OH 43015		January 10 & 11, 2012
INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number
Greg Sanders	Ohio EPA, Environmental Specialist	614.728.3851
CA REPRESENTATIVE(S)		
Bill Simpson	Pretreatment Coordinator, City of Delaware	740.203.1953
Ron Broyles	Pretreatment Specialist, City of Delaware	740.203.1962
Greg Doubikin	Assistant Wastewater Manager, City of Delaware	740.203.1952

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.

SECTION I: IU IDENTIFICATION

FILE <u>1</u> Industry name and address Quala Wash Holdings fka, Quality Carriers & Quala Wash 1200 South Houk Road Delaware, OH 43015	Type of industry Transportation Equipment Cleaning
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR <u>442</u> , <u>403.6</u> Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) 1,153
	Average process flow (gpd) 1,018
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

Explanation: **See below**

Comments:

William Urbank, Facility Manager
35 employees; 1 shift per day, 5 days per week
Business consists of 60% fleet maintenance and 40% tank washing.
Current permit issued on 2-1-10 and expires 4-1-13.
Outfall 001 – sampling port located in NE corner of pretreatment building.
IU permit includes outfall schematic.
Raw materials used are ferrous chloride, sulfuric acid, lime, caustic, potassium permanganate and cationic polymer.
Uses Alloway Labs.
Waste sludge hauled by Republic to Pine Grove Landfill.

Control authority, City of Delaware, conducted an inspection on 9-29-11. Findings of inspection include pH meter not in operation, no flow recorder and oil skimmer not working. IU addressed issues on 11-16-11.
Control authority inspection on 8-4-10. Findings of inspection include pump pit in need of repair, oil skimmer needs repaired, pH meter and chart recorder need repaired.
Control authority sampled on 7-20-11.

FILE 1 cont. Industry name and address Quala Wash Holdings 1200 South Houk Road Delaware, OH 43015	Type of industry Transportation Equipment Cleaning
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Comments;

IU permit limits as follows:

Parameter	daily maximum ug/l	frequency	type
As	200	1/mn	24 hr comp
Cd	100	1/mn	24 hr comp
Cr, Total	4700	1/mn	24 hr comp
Cr+6	300	1/mn	24 hr comp
Cu	1400	1/mn	24 hr comp
Cy	600	1/mn	24 hr comp
Pb	1200	1/mn	24 hr comp
Hg	3	1/mn	24 hr comp
SGT-HEM	26000	1/mn	24 hr comp
Ni	1000	1/mn	24 hr comp
Se	200	1/mn	24 hr comp
Ag	500	1/mn	24 hr comp
Sulfides	50000	1/mn	24 hr comp
Zn	5800	1/mn	24 hr comp
Toxic Substances	Prohibited		

Self-monitoring by Quala Wash Holdings conducted on 11-16-11, 10-19-11, 9-30-11, 8-21-11, 6-3-11, 5-18-11, 4-20-11, 2-23-11, 1-26-11, 12-15-10, 11-17-10, 10-27-10, 9-22-10, 8-25-10, 7-21-10, 6-23-10, 5-19-10, 4-21-10, 3-24-10, 2-17-10, 1-14-10 and 12-30-09.

Self-monitoring by IU for March 2011 was submitted late to control authority, LOV by control authority in file.

Letter of Violation (LOV) issued on 7-18-11 for Selenium violation on 6-29-11. Se at 495 ug/l & limit at 200 ug/l.

LOV issued on 6-20-11 for SGT-HEM violation on 5-18-11. SGT-HEM at 73,000 ug/l & limit at 26,000 ug/l.

LOV issued on 11-6-11 for not completing corrective action from 10-6-11 letter.

LOV issued on 4-27-11 for late reporting for 3-16-11 sample. Submitted on 4-26-11.

LOV issued on 2-24-10 for late reporting for 1-14-10 sample. Submitted on 2-19-10.

SECTION I: IU IDENTIFICATION (Continued)

FILE <u>2</u> Industry name and address Henkle Surface Technologies 421 London Road Delaware, OH 43015	Type of industry Cleaners, lubricants & strippers SIC #2899	
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU Category(ies) _____ <input checked="" type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) 10,935	Average process flow (gpd) 10,210
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

COMPLIANCE STATUS

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

EXPLANATION:

Comments;

Robert Haugh, Plant Manager; 740.363.1351

47 employees, 24 hours/day and 3 days/week.

Manufacture 4,300,000 lubricants per month, 2,200,000 cleaners per month & 24,000 powders per month.

Most recent industrial pretreatment survey dated 3-22-10.

Current permit issued on 4-1-10 and expires 3-31-13.

Outfall 001 – outfall of treatment hopper.

IU permit includes outfall schematic.

Pretreatment system includes equalization tank, pH adjustment and flow collection.

Raw material used is sulfuric acid.

Wastewater – sanitary – 725 gpd, cleaning & rinse – 5,548 gpd & NCCW – 4,662 gpd.

Uses Advanced Analytical for lab.

Waste sludge hauled by Dynecol to Price Barnes.

Phone calls notes and e-mails located in IU file.

Control authority, City of Delaware, conducted an inspection on 10-13-11 and 7-29-10.

Control authority sampled on 7-20-11.

FILE 2 con't. Industry name and address	Type of industry
Henkle Surface Technologies 421 London Road Delaware, OH 43015	Cleaners, lubricants & strippers

Comments

IU permit limits as follows:

Parameter	daily maximum ug/l	frequency	type
As	200	2/yr	24 hr comp
Cd	100	2/yr	24 hr comp
Cr, Total	4700	2/yr	24 hr comp
Cr+6	300	2/yr	24 hr comp
Cu	1400	2/yr	24 hr comp
Cy	600	2/yr	24 hr comp
Pb	1200	2/yr	24 hr comp
Hg	3	2/yr	24 hr comp
SGT-HEM	26000	2/yr	24 hr comp
Ni	1000	2/yr	24 hr comp
Se	200	2/yr	24 hr comp
Ag	500	2/yr	24 hr comp
Sulfides	50000	2/yr	24 hr comp
Zn	5800	2/yr	24 hr comp
Toxic Substances	Prohibited		

Chain of custody forms completed in file.

Self-monitoring by Henkel Surface Technologies, conducted on 8-17-11, 2-10-11, 8-18-10, 2-17-10 and 9-18-09.
No violations reported by self-monitoring.

SECTION I: IU IDENTIFICATION (Continued)

FILE <u>3</u> Industry name and address PPG industries 760 Pittsburg Drive Delaware, OH 43015	Type of industry SIC 2851 Manufactures refinishing coatings for the Automotive industry
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU Category(ies) <input checked="" type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) 7,283
	Average process flow (gpd) 3,450
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

EXPLANATION: **See below**

Comments;

Barbara Coruna – EHS Process Engineer; 740.368.7405

328 employees; 3 shift per day and 7 days per week

Most recent industrial pretreatment survey dated 3-19-10.

Current permit issued on 4-1-10 and expires on 3-31-13.

Outfall 001 is outfall of tank 177 located in the E-coatings division.

No pretreatment equipment.

IU permits includes outfall schematic.

Raw material used is butyl cellosolve.

Uses Ginosko Labs.

Waste sludge hauled by Quality Services Inc. and Clean Harbors.

Noted large discrepancy between city water used and wastewater flows in pretreatment survey questionnaire.

Pretreatment survey questionnaire not fully completed by PPG.

Control authority, City of Delaware, conducted an inspection on 8-2-11. Findings of the inspection include all outside storage had been eliminated for products, raw materials and hazardous waste. Also, repair and lining of older tank farm walls. Cover letter with report sent by control authority on 8-8-11.

FILE 3 con't. Industry name and address	Type of industry
PPG Industries 760 Pittsburg Drive Delaware, OH 43015	SIC 2851 Manufactures refinishing coatings for the Automotive industry

Comments

IU permit limits as follows:

Parameter	daily maximum ug/l	frequency	type
As	200	2/yr	24 hr comp
Cd	100	2/yr	24 hr comp
Cr, Total	4700	2/yr	24 hr comp
Cr+6	300	2/yr	24 hr comp
Cu	1400	2/yr	24 hr comp
Cy	600	2/yr	24 hr comp
Pb	1200	2/yr	24 hr comp
Hg	3	2/yr	24 hr comp
SGT-HEM	26000	2/yr	24 hr comp
Ni	1000	2/yr	24 hr comp
Se	200	2/yr	24 hr comp
Ag	500	2/yr	24 hr comp
Sulfides	50000	2/yr	24 hr comp
Zn	5800	2/yr	24 hr comp
Toxic Substances	Prohibited		

Self-monitoring by PPG conducted on 8-5-11, 2-7-11, 8-9-10 & 2-18-10.

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
Quala Wash	Henkle Surface	PPG	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)	
X	X	X	X		3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					4. Control mechanism contents	403.8(f)(1)(ii)
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)(ii)(B)
					c. Applicable effluent limits	403.8(f)(1)(iii)(C)
X	X	X			• Application of applicable categorical standards	403.8(f)(1)(i)
X	X	X			-Classification by category/subcategory	
X	X	X			-Classification as new/existing source	
X	N/A	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 CWF or FWA	403.6(d)&(e)
X	N/A	N/A			• Application of applicable local limits	
N/A	X	N/A			• Application of most stringent limit	403.8(f)(1)(i)
Comments						

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	
1	1	1			• 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)
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)(1)(v)
Comments						
1 - Schematic of sampling outfalls attached to all IU permits.						

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							
I. Identification of and response to violations							403.8(D)(2)(vi)
					a. Discharge violation		
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 ENFORCEMENT ACTIVITIES (Continued)	
	N/A	N/A			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	
	N/A	N/A			d. Spill/slug load	
X	X	X			e. Reporting	
X	N/A	N/A			f. Compliance schedule	
	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	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

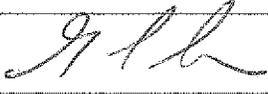
SIUs – Grady Hospital, Henkel Surface Technology, International Paper (fka Weyerhaeuser), Quala Wash Holdings and PPG. Non-SIUs – Delo-Screw, Sam Dong, fka, Nippert.

Other industrial users in inventory; Ohio Wesleyan, AHP, National Metal Shapes, Red Built, LLC, DMS, Savare Specialty Adhesives and International Paper Specialty Division.

No SIUs in SNC, but one with compliance schedule (Quala Wash Holdings).

CA inspects and samples SIUs 1/yr. Self-monitoring conducted by SIUs 2/yr except Quala is 1/mn and Grady Hospital is 1/yr. Reporting for SIUs is 2/yr except for Quala which is 1/mn.

PPG pretreatment survey questionnaire was not adequately completed. Also, noted large discrepancy between city water and wastewater flows.

SECTION I COMPLETED BY:	Gregory L. Sanders 	DATE:	2-14-12
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.)

Technical justification of local limits submitted to Ohio EPA.

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

Yes	No
X	

If yes, describe. **Technical justification pending review by the Ohio EPA.**

B. LEGAL AUTHORITY [403.8(f)(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.

Yes	No
X	

There are two concrete plants in township, inside City limits. No issue with plants.

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.

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 five significant industrial users; one categorical and four non-categoricals.**

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

Periodic industrial waste survey.

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

Annually at industrial user inspections.

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.		

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: Discharge permit issued with local limits and additional limits believed to be applicable to the UST discharger. Pemcor hauled for Clark Oil, once in November 2011.		

3. a. Do you accept any waste by truck, rail, or dedicated pipe? Trucked waste	Yes	No
	X	
		X
b. Is any of the waste hazardous as defined by RCRA? 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)] IU permit issued and local limits applied to hauled waste. Treated differently than SIU wastewater. Hauled waste is surcharged at a much higher rate. Key card for septage haulers and they discharge to one of two holding tanks.		

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 apply local limits and surcharge hauled waste. Only domestic septic tanks accepted.**

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)]
Continuing education credit for wastewater III license plus various operator's groups such as OTCO.

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.) If yes, how has this been addressed?		X

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: 12/01/2009 to 12/31/2011.)

- 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	0%
0	0%
0	0%
0	0%

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

2. Who performs your compliance sampling and analysis?

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

Sampling	Analysis
City staff	Alloway

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 with every industrial user.

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 every IU inspection.

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

All of them-5

G. ENFORCEMENT

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

	Yes	No	Explain
• Interference		X	
• Pass through	X		2 copper spikes
• Fire or Explosions		X	
• Corrosive structural damage		X	
• Flow obstructions		X	
• Excessive flow rates	X		excessive //I
• 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:

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

If yes, explain.

Yes	No
	X

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

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

Yes	No
X	
X	

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

a. Date of last modification: **Last modification done in 1991.**

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, however, continued non-compliance with Quala Wash Holdings. Recommend to update ERP to make more stringent and increase fines.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14] **Case by case through city attorney, no requests so far.**

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

Case by case.

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. Computerized reports, regularly back-up files on computer.

b. How long are records maintained? [403.12(o)] **hard copy and bench sheets kept at least 3 years; electronic copies kept indefinitely and backed up twice per week on city server.**

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 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]. **Bill Simpson and Ron Broyles**

2 part-time

2. Do you have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

Yes

No

X

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**

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?) **Evaluating silver, mercury, bis-2 phtalate and phosphorus. Technical justification of local limits submitted to Ohio EPA for review.**

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?

Yes	No
X	

b. Are there any plans to initiate a program to educate users about pollution prevention?

Yes	No
X	

Explain. **Provide education to IUs and watershed coordinators. Flyers & brochures sent out.**

4. What efforts have been taken to incorporate pollution prevention into the pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)? **Flyers & brochures.**

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

Two copper spikes caused pass through at treatment plant. Cause not determined.

Addressing excessive infiltration and inflow issue.

Recommend to update Enforcement Response Plan to be more stringent and increase fines due to continuing non-compliance by Quala Wash Holdings.

SECTION II
COMPLETED BY:

Gregory L. Sanders



DATE:

2-14-12

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 Delaware Upper Oientangy Water Reclamation Facility (UOWRF)**
2. Original pretreatment program submission approval date: **Prior to 1988**
3. Required frequency of reporting to Approval Authority: **Quarterly (January, April, July & October)**
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
Delaware UOWRF	4PDS0004 MD	January 1, 2011	July 31, 2015

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 Delaware UOWRF	March 7, 2003

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM] **August 29, 1990**
2. Identify any substantial modifications the CA made in its pretreatment program in the last five years. [403.18]

Date Approved	Name of Modification
Prior 1988	Pretreatment program approved
5/21/91	Permits & SIU list
10/8/91	SIU list
12/15/92	Ordinance & Enforcement response plan
6/15/95	Enforcement response plan & Permits
7/15/97	Local limits evaluation
9/28/05	Local limits evaluation
10/19/11	Technical justification of local limits submitted to Ohio EPA

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: City of Delaware UOWRF	2. Location address: 225 Cherry Street Delaware, OH 43015
---	--

3. a. NPDES permit number 4PD00004*MD / OH0024911	b. Expiration date July 31, 2015	4. Treatment plant wastewater flows					
		<table border="1" style="margin: auto;"> <tr> <td style="padding: 2px;">Design</td> <td style="text-align: center; padding: 2px;">10.0</td> </tr> </table>	Design	10.0	<table border="1" style="margin: auto;"> <tr> <td style="padding: 2px;">Actual</td> <td style="text-align: center; padding: 2px;">4.55</td> </tr> </table>	Actual	4.55
Design	10.0						
Actual	4.55						
		MGD	MGD				

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

6. a. Industrial contribution (MGD) 0.064	b. Number of SIUs discharging to plant 5 SIUs / 1 Cat	c. Percent industrial flow to plant <table border="1" style="margin: auto;"> <tr> <td style="padding: 2px;">% Industrial Flow</td> <td style="text-align: center; padding: 2px;">1.5 %</td> </tr> </table>	% Industrial Flow	1.5 %
% Industrial Flow	1.5 %			

7. Level of treatment	Type of Process(es)
a. Primary	Bar screens, grit tanks, scum removal & primary settling
b. Secondary	Biological nitrification and BOD removal, biological denitrification, secondary clarification, gravity thickeners, filter press, FeCl₂ addition and polymer addition
c. Tertiary	Ultraviolet light disinfection, sand filters & post aeration

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

9. Effluent Discharge		
a. Receiving water name Olentangy 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. **N/A**

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

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

12. Indicate methods of sludge disposal.

	Quantity of sludge		Quantity of sludge		
a. Land application	<input type="text"/>	dry tons/year	e. Public distribution	<input type="text"/>	dry tons/year
b. Incineration	<input type="text"/>	dry tons/year	f. Lagoon storage	<input type="text"/>	dry tons/year
c. Monofill	<input type="text"/>	dry tons/year	g. Other (specify)	<input type="text"/>	dry tons/year
d. MSW landfill	1067	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). **Delaware Codified Ordinance, Section 917.**

b. Date enacted/adopted: **September 24, 1984** c. Date of most recent revisions: **January 2006**

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

	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? **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	N/A	N/A

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

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?

Reviewed annually

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(i)(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 or recent NPDES cycle		
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:	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 or hauled waste discharges to septage receiving station which is one of two tanks. Trucked or hauled waste utilize a swiping card system that matches load to hauler.			
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)]	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		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

G. APPLICATION OF STANDARDS (Continued)

5. Has the CA (or its local agency) evaluated the need for local limits for all pollutants listed below? (w/NOB LEVEL)
[403.5(e)(1), 403.8(f)(4)]

9/28/05

Partial Technical Evaluation (not all 10 pollutants evaluated)?

	Works Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric) (ug/l)
	Yes	No	Yes	No	Yes	No	
	a. Arsenic (As)			X		X	
b. Cadmium (Cd)			X		X		4.6
c. Chromium (Cr)			X		X		11
d. Copper (Cu)			X		X		-
e. Cyanide (CN)			X		X		12
f. Lead (Pb)			X		X		18
g. Mercury (Hg)			X		-		12
h. Molybdenum (Mo)			X		X		20,000
i. Nickel (Ni)			X		X		100
j. Selenium (Se)			X		-		5
k. Silver (Ag)			X		X		1.3
l. Zinc (Zn)			X		X		230
m. Other (specify): Tl			X		-		160

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/mn	1/mn	1/mn	1/year
• Other SIUs	1/year	1/year	1/year	1/year
c. Self-monitoring				
• CIUs	2/yr	2/year	2/year	2/year
• Other SIUs	2/yr	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			
1. Does the CA's program define "significant noncompliance"? Chapter 917.24 (f) in SUO	<input checked="" type="checkbox"/>	Yes	No
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	<input checked="" type="checkbox"/>		
Yes, consistent w/Ohio EPA's definition.			
If no, provide the CA's definition of "significant noncompliance."			
2. Does the CA have an approved, written ERP? [403.8(f)(5)] 1991		<input checked="" type="checkbox"/>	No
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"/>		
b. Compliance schedule	<input checked="" type="checkbox"/>		
c. Injunctive relief	<input checked="" type="checkbox"/>		
d. Imprisonment	<input type="checkbox"/>		
e. Termination of service	<input checked="" type="checkbox"/>		
f. Administrative Order	<input checked="" type="checkbox"/>		
g. Revocation of permit	<input checked="" type="checkbox"/>		
h. Fines (maximum amount)	<input checked="" type="checkbox"/>		
• Civil		\$ 1,000/day/violation	
• Criminal		\$ 1,000/day/violation	
• Administrative		\$ 1,000/day/violation	
J. DATA MANAGEMENT/PUBLIC PARTICIPATION			
1. Does the approved program describe how the POTW will manage its files and data?		Yes	No
2. Files are kept on computer, backed up regularly, and some kept by hard copy .		<input checked="" type="checkbox"/>	
Are files/records	<input type="checkbox"/>		
computerized?	<input checked="" type="checkbox"/>		
hard copy?	<input checked="" type="checkbox"/>		
2. Are program records available to the public?		<input checked="" type="checkbox"/>	No
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]		<input checked="" type="checkbox"/>	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components: **Two part-time; Bill Simpson & Ron Broyles.**

	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	<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

Pending approval of technical justification of local limits by Ohio EPA.

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders 	DATE:	2-14-12
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 REQUIRED ACTIONS
IU Characterization	<ul style="list-style-type: none"> • CA has adequately identified and characterized all industrial users.
Control Mechanism	<ul style="list-style-type: none"> • No deficiencies noted.
Application of Pretreatment Standards	<ul style="list-style-type: none"> • Interview and file review indicated CA evaluates and inspects non-significant industrial users at a frequency to ensure compliance with pretreatment standards and requirements.
Compliance Monitoring	<ul style="list-style-type: none"> • No deficiencies noted.
Enforcement Activities	<ul style="list-style-type: none"> • Recommend to update enforcement response plan to make more stringent.
Program Modifications	<ul style="list-style-type: none"> • Technical justification of local limits submitted to Ohio EPA for review on 10/19/11.