



**Environmental  
Protection Agency**

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

April 23, 2012

Greg Davies, Director  
Department of Public Utilities  
City of Columbus Department of Utilities  
Division of Sewerage and Drainage  
Industrial Wastewater Pretreatment Section (IWPS)  
910 Dublin Road, Room 4002  
Columbus, Ohio 43215

**Re: Industrial Pretreatment Compliance Inspection on March 6 & 7, 2012  
City of Columbus – Southerly / Franklin County: 4PF00001\*OD**

Dear Mr. Davies:

On March 6 & 7, 2012, Ohio EPA conducted a Pretreatment Compliance Inspection (PCI) of the City of Columbus Industrial Pretreatment Program (IPP). Jeff Bertacchi, of the City of Columbus 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 Columbus' IPP has again been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). Mr. Bertacchi is doing a good job administering the pretreatment program. As before, the electronic files and pretreatment database allowed me to understand and follow the city's IPP.
2. The City of Columbus has submitted the required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according the schedule in the Columbus NPDES permit for the PCI time period of January 1, 2010 through January 31, 2012.
3. No reportable non-compliance (RNC) was identified during the PCI. Columbus met the minimum program frequency for conducting industrial user inspections during 2010 and 2011. Industrial user self-monitoring and Columbus independent user sampling have been conducted according to program requirements for the PCI time period.
4. One instance of industrial user significant non-compliance (SNC) occurred during the PCI time period due from Strawser Steel Drum. The City of Columbus took the appropriate action to address the SNC.

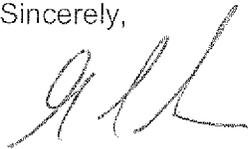
No program deficiencies were identified during the PCI. Please continue to:

1. Ensure that the minimum industrial user inspection frequencies are met and documented in program files. It is recommended that cover letters summarizing inspection findings and required actions are sent along with the inspection report to the industrial users.

2. Columbus 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 Columbus Industrial Pretreatment Program Annual Report.
3. Columbus must periodically monitor (sample and/or inspect) non-significant industrial users at a frequency to ensure compliance with pretreatment standards and requirements. Updated information must be kept in the industrial user files.

There are no required or recommended actions that are needed by the City of Columbus. Please acknowledge the receipt of this letter no later than XXXXXXXXX. Ohio EPA recognizes the continuing commitment demonstrated by you and Mr. Bertacchi to ensure ongoing compliance with 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](mailto: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 Bertacchi, City of Columbus

ec: Greg Sanders, DSW/CDO

GS/nsm 6March2012PClcoverletter\_Southerly



Ohio Environmental Protection Agency

# PRETREATMENT INSPECTION REPORT

FACILITY NAME <b>City of Columbus – Southerly</b>		PERMIT NUMBER <b>4PF00001*OD</b>	FACILITY NUMBER <b>OH0024741</b>
INSPECTION TYPE <b>P</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>1</b>	DATE CONDUCTED <b>March 6 &amp; 7, 2012</b>

**GENERAL INFORMATION**

NAME AND LOCATION OF FACILITY  
**City of Columbus Department of Public Utilities**  
**Division of Sewerage & Drainage**  
**Industrial Wastewater Pretreatment Section (IWPS)**  
**1250 Fairwood Avenue**  
**Columbus, OH 43206-3372**

MAILING ADDRESS OF FACILITY  
**City of Columbus**  
**Department of Public Utilities**  
**910 Dublin Road**  
**Columbus, OH 43215**

CONTACT (NAME/TITLE/PHONE)  
**Jeff Bertacchi, Pretreatment Program Manager 614.645.5912**

**FACILITY EVALUATION**

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

<b>S</b>	<b>Pretreatment Compliance Inspection (PCI) Attached</b>		

Names(s) and Signature(s) of Inspector(s) <b>Gregory L. Sanders</b> 	Ohio EPA Division of Surface Water Central District Office <b>614.728.3851</b>	Date <b>3-20-12</b>
Signature of Reviewer <b>Jeff Bohne, Supervisor</b> 	Ohio EPA Division of Surface Water Central District Office <b>614.728.3843</b>	Date <b>4-13-12</b>

## WENDB AND RNC WORKSHEET PCI CHECKLIST

<b>FACILITY INFORMATION</b>			
Name: <b>City of Columbus – Southerly</b>			
OH Number: <b>OH0024741</b>	NPDES Number: <b>4PF00001*OD</b>		
Date of Inspection: <b>March 6 &amp; 7, 2012</b>			
<p style="margin: 0;">INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced in this worksheet.</p>			
	<b>Data</b>	<b>Checklist Reference</b>	<b>PCS Code</b>
Number of SIUs	33	II.C.1	SIUS
Number of CIUs	20	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
<b>II. RNC/SNC WORKSHEET</b>			
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC			
	<b>RNC</b>	<b>Level</b>	<b>Reference</b>
<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	
<b>SNC</b>			
<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		

**PRETREATMENT COMPLIANCE INSPECTION (PCI) CHECKLIST**

PLI # _____ TEL # _____		
Cover page and Acronym List		
Section I	IJ 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"/> WENDT/RSC 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 Columbus – Southerly Department of Public Utilities Division of Sewerage and Drainage Industrial Wastewater Pretreatment Section (IWPS) 1250 Fairwood Avenue Columbus, OH 43206-3372		March 6 & 7, 2012
INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number
Greg Sanders	Ohio EPA, Environmental Specialist	614.728.3851
CA REPRESENTATIVE(S)		
Jeff Bertacchi	Pretreatment Program Manager	614.645.5912

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 IDENTIFICATION**

FILE 1 Industry name and address  
**Industrial Container Services – OH**  
**fka, Columbus Steel Drum**  
**1385 Blatt Boulevard**  
**Blacklick, OH 43004**

Type of industry  
  
**SIC 7699 Recondition 55 gallon steel drums**  
**Permit #010397-2; (4-28-08 to 4-27-13) local limits**

IU CLASSIFICATION BY CA:  
 CIU 40 CFR \_\_\_\_\_, \_\_\_\_\_  
 Category(ies) \_\_\_\_\_  
 **Non-categorical SIU (extra strength)**  Non SIU

Average total flow (gpd)	Average process flow (gpd)
<b>7,000</b>	<b>5,000</b>
Industry visited during audit?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

**COMPLIANCE STATUS**

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

Explanation: **Zinc violation on 6-22-10.**

**Kay Rykowski 614.864.1900.**  
**Brian Grannan, Industrial Engineer; 614.856.5916.**

**Operates 10 hours per day and 5 days per week; 10 employees.**  
**Pretreatment system includes clarification, filtration, flocculation, equalization, coagulation and neutralization.**  
**Has a batch discharge.**  
**Drum cleaning with sodium hydroxide, sodium nitrate and phosphoric acid.**  
**Slug control plan dated 11-06-09 on file.**  
**Industrial SW discharge permit dated 2-17-11.**  
**IU permit application dated 12-14-07.**  
**Schematic with application.**  
**Columbus Steel Drum sold to Industrial Container Services – OH on 12-13-07.**  
**Facility not located in City of Columbus MS4.**  
**Waste residuals: sodium hydroxide sludge hauled by Veolia, oxidizer ash hauled by MBI to SWACO, filter cake and painter booth filter hauled by Waste Management to SWACO, paint solvent hauled by Nexco to AES, silicone water hauled by Central States to Pine Grove, used oil hauled by Environmental Specialties.**  
**Outfall 001 – pre-fab monitoring manhole with palmer-bowlus flume, located north of main entrance.**  
  
**Sampling by control authority on 11-8-11, 10-26-11, 7-18-11, 4-5-11, 3-21-11, 11-18-10, 9-14-10, 7-21-10, 5-17-10, 3-15-10 and 1-29-10.**  
  
**Inspection by control authority on 8-04-11 and 10-6-10.**

**SECTION I: IU IDENTIFICATION**

FILE 1 con't. Industry name and address  
**Industrial Container Services – OH**  
**fka, Columbus Steel Drum**  
**1385 Blatt Boulevard**  
**Blacklick, OH 43004**

Type of industry  
  
**SIC 7699 Recondition 55 gallon steel drums**  
**Permit #010397-2; (4-28-08 to 4-27-13) local limits**

IU CLASSIFICATION BY CA:  
 CIU 40 CFR \_\_\_\_\_, \_\_\_\_\_,  
 Category(ies) \_\_\_\_\_  
 **Non-categorical SIU (extra strength)**  Non SIU

Average total flow (gpd)	Average process flow (gpd)
<b>7,000</b>	<b>5,000</b>
Industry visited during audit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Comments;  
 IU permit is as follows:

Parameter	daily maximum ug/l	daily avg ug/l
Arsenic	1000	1500
Carbon disulfide	60	
Chloromethane	70	
Total chromium	30000	20000
Total Copper	4050	2700
Ni	7500	5000
Total Cyanide	5000	
flow	-	
FOG	200000	4000
Total Lead	6000	4000
Total Mercury	30	20
Total Nickel	7500	5000
pH	5.0-12.5	
Total Zinc	4500	3000

Sampling frequency is once every four months for all parameters.

NOV 01973 dated 6-22-10 for zinc violation; fined \$1,000.

**SECTION I: IU IDENTIFICATION (Continued)**

FILE <u>2</u> Industry name and address <b>Coca-Cola Refreshments</b> <b>2455 Watkins Road</b> <b>Columbus, OH 43207</b>	Type of industry <b>Syrup manufacturing facility</b> <b>SIC 2087</b> <b>Permit #010031-5 (1-16-12 to 1-15-17) local limits</b>	
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU Category(ies); <input checked="" type="checkbox"/> <b>Non-categorical SIU (extra strength)</b> <input type="checkbox"/> Non SIU	Average total flow (gpd) <b>195,200</b>	Average process flow (gpd) <b>192,200</b>
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;**  
**Joe Pohiman, SES Manager; 614.492.6418**  
**Tracy Fornwalt**

**Operates 2 shifts per day and 5 days/ per week; 120 employees.**  
**Manufacturers 246,400 gallons of syrup per day.**  
**Pretreatment system (Zeeweed MBR system) includes equalization, filtration and neutralization.**  
**Pretreatment system manual dated 10-16-09 on file.**  
**SPCC plan dated 3-23-09 on file.**  
**NOE issued by Ohio EPA dated 4-29-10.**  
**Schematic of utilities with application.**  
**Wastewater sources include syrup mixing, bag in box filling, bulk tanker filling, boiler blow down, filter backwash and bioreactor sludge. Domestic sanitary flows average 150,000 to 200,000 gpd.**  
**Fact sheet issued by control authority with IU permit has pictures of storm water concerns and pretreatment system concerns.**  
**Outfall 002 – end of pipe, sampler in shed.**  
**Outfall 003 – pretreatment bypass from 200,000 gallon storage tank to sanitary sewer.**  
**Inspection by control authority on 12-15-11 and 12-14-11.**

**SECTION I: IU IDENTIFICATION (Continued)**

FILE 2 con't. Industry name and address  
**Coca-Cola Refreshments**  
**2455 Watkins Road**  
**Columbus, OH 43207**

Type of industry  
**Syrup manufacturing facility**  
**SIC 2087**  
**Permit #010031-5 (1-16-12 to 1-15-17) local limits**

IU CLASSIFICATION BY CA:

Average total flow (gpd)	Average process flow (gpd)
<b>195,200</b>	<b>192,200</b>

CIU  
 Category(ies);

Industry visited during audit? Yes  No

Non-categorical SIU (extra strength)  Non SIU

Comments;

IU permit is as follows:

Parameter	daily maximum ug/l
Arsenic	1000
Cd	500
Cr	20000
Cu	2700
Cy	5000
FOG	200000
Pb	4000
Hg	20
Ni	5000
Se	10000
Zn	3000
pH	5.0-12.5

Self-monitoring is not required by permit but still conducted monthly by Coca-Cola Refreshments.

NOV issued by control authority for storm water discharge from membrane maintenance pad on 2-26-10.

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
ICS	Coca-Cola	File	File	File		
File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	
					A. ISSUANCE OF IU CONTROL MECHANISM	
X	X				1. Control mechanism application form	
X	X				2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
X	X				3. Issuance or reissuance of control mechanism 403.8(f)(1)(iii)	
X	X				4. Control mechanism content 403.8(f)(1)(iii)	
X	X				a. Statement of duration (< 5 years) 403.8(f)(1)(iii)(A)	
X	X				b. Statement of nontransferability w/o prior notification/approval 403.8(f)(1)(iii)(B)	
X	X				c. Applicable effluent limits 403.8(f)(1)(iii)(C)	
N/A	N/A				• Application of applicable categorical standards 403.8(f)(1)(i)	
N/A	N/A				-Classification by category/subcategory	
N/A	N/A				-Classification as new/existing source	
N/A	N/A				-Application of limits for all categorical pollutants	
N/A	N/A				-Application of TTO or TOMP alternative	
N/A	N/A				-Calculation and application of production-based standards 403.6	
N/A	N/A				-Calculation and application of CWS or FWA 403.8(f)(1)(i)	
X	X				• Application of applicable local limits	
N/A	N/A				• Application of most stringent limit 403.8(f)(1)(i)	
Comments						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					<b>A. INSTANCE OF IU CONTROL MECHANISM (Continued)</b>	
X	X				d. IU self-monitoring requirements	403.8(f)(1)(iii)(D)
X	X				• Identification of pollutants to be monitored	
X	X				• Sampling frequency	
X	X				• Sampling locations/discharge points defined	
X	X				• Reporting requirements	
X	X				• Appropriate sample types (grab or composite)	
X	X				• Record keeping requirements	403.12(e)
X	X				e. Statement of applicable civil and criminal penalties	
N/A	N/A				f. Compliance schedules/progress reports (if applicable)	
X	X				g. Requirement to notify CA of slug loadings	
X	X				h. Requirement to notify CA of spills, bypasses, upsets, etc.	
X	X				i. Requirement to notify CA of significant change in discharge	
X	X				j. 24-hour notification of violation/resample requirement	403.8(f)(1)(iii)(D)
X	X				k. Slug discharge control plan requirement (if applicable)	403.8(f)(1)(v)
Comments						

File <u>1</u>	File <u>2</u>	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					<b>B. COMPLIANCE MONITORING</b>	
X	X				<b>1. Inspection</b>	
X	X				a. Inspection at frequency specified in approved program	403.8
X	X				b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
X	X				c. Evaluation of need for spill discharge control plan (evaluation of existing plans)	403.8(f)(1)
X	X				<b>2. Sampling</b>	
X	X				a. Sampling at frequency specified in approved program	403.8
X	X				b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
X	X				c. Analysis for all required parameters	403.8(f)(1)
X	X				d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
<b>Comments</b>						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
<b>C. CA ENFORCEMENT ACTIVITIES</b>						
					<b>1. Identification of and response to violations</b>	403.8(f)(2)(vi)
X	N/A				a. Discharge violations	
X	X				• IU self-monitoring	
X	X				• CA compliance monitoring	
X	N/A				b. Monitoring/reporting violations	
X	X				• IU self-monitoring	
X	X				-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
X	X				-Sampling (e.g., frequency, parameters)	
N/A	N/A				-TTO requirements met	
X	X				-Notification	
X	X				-Notified CA of significant change in operation or discharge	403.12(j)
X	X				-Immediate notification of slug lead discharge or accidental spill	OAC 3745-3-05
X	X				-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
X	X				-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
X	X				• Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
N/A	N/A				• Met compliance schedule milestones by required dates	403.12
N/A	N/A				c. Compliance schedule violations	
N/A	N/A				• Start-up/final compliance	
N/A	N/A				• Interim dates	
Comments						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
<b>C. CA ENFORCEMENT ACTIVITIES (Continued)</b>						
N/A	N/A				2. Proper calculation of SNC	403.8(f)(2)(vii)
					a. Chronic	
N/A	N/A				b. TRC	
					c. Fees through/interest	
N/A	N/A				d. Spill/slug load	
N/A	N/A				e. Reporting	
N/A	N/A				f. Compliance schedule	
N/A	N/A				g. 30-day violations (penalty)	
N/A	N/A				3. Adherence to approved ERP	
					a. Proper response to violation	
N/A	N/A				b. Escalation of enforcement	403.8(f)(5)
N/A	N/A				4. Return to compliance	
N/A	N/A				a. Within 90 days	
N/A	N/A				b. Within time specified	
N/A	N/A				c. Through compliance schedule	
N/A	N/A				5. Publication for SNC	403.8(f)(2)(vii)
N/A	N/A				<b>D. OTHER</b>	

Comments

SECTION I COMPLETED BY: <b>Gregory L. Sanders</b> <i>GLS</i>	DATE: <i>3-20-12</i>
TITLE: <b>Environmental Specialist</b>	TELEPHONE: <b>614.728.3851</b>

## 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 [403.3]

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.) **Initial approval of ERP and SUO by Ohio EPA. Modification of ERP completed. SUO pending council approval then will submit to the Ohio EPA.**

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

If yes, describe.

Yes	No
	X

### B. LEGAL AUTHORITY [403.306(a)]

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. **Columbus sends IUs letter for permit.**

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 [403.81502(a)233]

1. Have you changed how SIUs are classified?

**No recent changes. SIUs defined same as federal definition in 40 CFR 403.3. Listed in Columbus SUO, Chapter 1145.02.064.**

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

**Use Industrial Waste Survey.**

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

**From annual inspections and IU permit renewal applications.**

**D. CONTROL MECHANISM EVALUATION** [403.8(d)(3)(ii)]

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%
b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]		
If any, explain. <b>Added Methodist Hospital in Dublin as IU in early 2010.</b>		

2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW? <b>By trucked waste disposal.</b>	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? 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)] <b>Uses a trucked waste disposal site (TWDS) operated by Kurtz Brothers. KB Organic Waste Recovery &amp; Reuse samples trucks &amp; organizes manifests. New KB facility opened 12/1/09 and will separate FOG &amp; sludge. New facility built for car wash grit that replaces Berliner Park site.</b>	Yes	No
	X	
		X

4. What limits (categorical, local, other) do you apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)] **Local limits applied with separate fee structure.**

**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)]  
**Attends and belongs to OWEA, WEF, Research WEF & other professional groups/ meetings. Technical editor of WEF for Control of Odor & Emissions and for Prevention and Control of SSOs.**

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? **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] **All sampled & inspected**  
 (Define the 12 month period September 2007 to October 2008.)

a. Not sampled or not inspected at least once [WENDB-NOIN]		0 %
b. Not sampled at least once		0 %
c. Not inspected at least once (all parameters)?		0 %
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?

	Sampling	Analysis
• Metals	City of Columbus	City of Columbus
• Cyanide	City of Columbus	City of Columbus
• Organics	City of Columbus	City of Columbus
• Conventionals	City of Columbus	City of Columbus
• Other (priority pollutants)	City of Columbus	Summit Lab

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)]

**Currently using splits, blanks & spikes. Developing new program for QA/QC and plan to be approved by NELC.**

4. Discuss any problems encountered in identification of sample location, collection, and analysis.

**No problems with sample location. Fact sheet developed w/IU permit. The fact sheet has pictures of outfall and Treatment system. Very thorough & organized system for controlling IUs.**

5. a. How and when do you evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

**IUs submit new plan every 5 years and slug control plan evaluated during annual inspections.**

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

**89**

**G. ENFORCEMENT**

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

	Yes	No	Explain
• Interference		X	
• Pass through		X	
• 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):		X	

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. **Not other than O&G from failing O&W separators.**

Yes	No
	X

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

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

Yes	No
X	
X	

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

a. Date of last modification: **Pending public notice from city council and second review of modification at Ohio EPA in Central Office. Original ERP – August 1994; Modified 10-24-10. last modification pending public notice of ERP and SUO.**

b. Problems with implementation: **None**

c. Is the ERP effective and does it lead to compliance in a timely manner? Provide examples if any are available.

**Yes, it is effective.**

**H. DATA MANAGEMENT/PUBLIC PARTICIPATION**

1. How are requests for confidentiality handled?[403.14]

**Requests follow federal guidelines. Request is sent to legal department for review of request. Protocol listed in SUO in Chapter 1145.59.**

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

**Protocol listed in SUO.**

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

(e.g., computerization, file system, etc.) **Data management includes hard copy & electronic files. A very detailed and organized computer and hard copy file system is utilized. Database currently being updated. One of the best systems that I've encountered in the pretreatment program.**

b. How long are records maintained? [403.12(o)] **Electronic files kept 5 years, with 24-hr back up and 3 yr back-up off-site. Hard copies are kept indefinitely on-site in storage (5 years kept in files).**

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

**Council & city bulletin. Public meetings w/IUs at city offices.**

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].

**12 pretreatment & 9 lab staff**

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

If no, explain.

Yes

No

**X**

3. Discuss any problems in program implementation which appear to be related to inadequate resources. (i.e., finances, equipment, personnel, training, etc.) **None**

**J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION**

1. Have you compiled historical data concerning influent, effluent, and sludge sampling for the POTW? If yes, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?) **No**  
 Discuss on pollutant-by-pollutant basis.

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. **FOG media events in news & newspaper at Thanksgiving & Christmas. Brochure hangers on doors when sewer maintenance reveal O&G in lines.**

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

**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**

3663 food establishments in FOG program. They are inspected every three years. Cost recovery of city increasing to \$1,500 per minimum of 4 hours. There is a rule on grease interceptors and traps.

*Handwritten signature*

SECTION II COMPLETED BY: <b>Gregory L. Sanders</b>	DATE: <b>3-20-12</b>
TITLE: <b>Environmental Specialist</b>	TELEPHONE: <b>614.728.3851</b>

## 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 Columbus – Southerly**
2. Original pretreatment program submission approval date: **11-30-1990**
3. Required frequency of reporting to Approval Authority: **Quarterly & annual**
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
Southerly WWTP	4PFC0001	8-1-2010	7-31-2015

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
Southerly WWTP	Approved thru NPDES permit listed above

### B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM]	<b>Prior to 1987 – files in archives</b>
---	--

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

Date Approved	Name of Modification
4-8-87	Monitoring frequencies
10-06-92 & 6-25-07	Local limits
7-6-94	Enforcement Management Systems
12-12-91	Permits
3-12-91 & 4-29-97	Ordinances
11-29-93	SIU list
8-19-94 & 10-24-00	Enforcement Response Plan
2010	ERP & SUO submitted to Ohio EPA for initial review

## 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: <b>Southerly WWTP</b>			2. Location address: <b>6977 South High Street, Lockbourne, Ohio</b>	
3. a. NPDES permit number <b>OH0024741 / 4PF00001*OD</b>		b. Expiration date <b>7-31-2015</b>	4. Treatment plant wastewater flows	
			Design	Actual
			<b>180</b>	<b>112.82</b>
			MGD	MGD
5. Sewer System		a. Separate % <b>98 %</b>	b. Combined % <b>2 %</b>	c. Number of CSOs <b>1</b>
6. a. Industrial contribution (MGD) <b>5.486 MGD</b>		b. Number of SIUs discharging to plant <b>33</b>	c. Percent industrial flow to plant	
			% Non-domestic Flow	% Industrial Flow <b>4.86 %</b>
7. Level of treatment		Type of Process(es)		
a. Primary		<b>Aerated grit removal, screening, preaeration &amp; primary settling</b>		
b. Secondary		<b>Activated sludge aeration &amp; secondary clarification</b>		
c. Tertiary		<b>Chlorination, dechlorination &amp; post aeration</b>		
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.				
	Influent (Times/Year)	Influent (Times/Year)	Sludge (Times/Year)	Receiving Stream (Times/Year)
a. Metals	<b>1/mn</b>	<b>1/mn</b>	<b>1/mn</b>	<b>1/mn</b>
b. Organics	<b>1/day</b>	<b>1/day</b>	<b>1/mn</b>	<b>1/mn</b>
c. Toxicity testing	-	<b>2/yr</b>	-	-
d. EP toxicity	-	-	-	-
e. TCLP	-	-	-	-
9. Effluent Discharge				
a. Receiving water name <b>Scioto River</b>		b. Receiving water classification <b>WWH</b>	c. Receiving water use <b>AWS, IWS &amp; PCR</b>	
d. If effluent is discharged to any location other than the receiving water, indicate where.				

**ATTACHMENT B: PRETREATMENT PROGRAM PROFILE**

<b>C. TREATMENT PLANT INFORMATION (Continued)</b>		
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)]	N/A	Yes
		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.		
a. Land application (581)	Quantity of sludge <b> </b>	dry tons/year
b. Incineration (585)	<b>13,381</b>	dry tons/year
c. Monofill	<b> </b>	dry tons/year
d. MSW landfill (586)	<b>85</b>	dry tons/year
e. Public distribution	Quantity of sludge <b> </b>	dry tons/year
f. Composting (584)	<b>6,267</b>	dry tons/year
g. Other (to another NPDES facility - 588)	<b>159</b>	dry tons/year
<b>D. LEGAL AUTHORITY</b>		
1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). <b>SUO; Columbus City Code – Chapters 1145, 1147 &amp; 1149</b>		
b. Date enacted/adopted: <b>11-30-1990</b>	c. Date of most recent revisions: <b>2009</b>	
2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(i-vii)]		
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)] (1049.03)	Yes	No
	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?	<b>numerous</b>	
List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.		
Jurisdiction Name	Number of CIUs	Number of Other SIUs
<b>Numerous satellite communities</b>		<b>Columbus issues IU permits.</b>

## 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
<b>X</b>	

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

**agreements**

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)(f)]

Yes	No
<b>X</b>	

b. Indicate which methods are to be used to update the IWS.

- |                                       |          |                                   |          |
|---------------------------------------|----------|-----------------------------------|----------|
| • Review of newspaper/phone book      | <b>X</b> | • Onsite inspections              | <b>X</b> |
| • Review of water billing records     | <b>X</b> | • Permit application requirements | <b>X</b> |
| • Review of plumbing/building permits | <b>X</b> | • Citizens involvement            |          |
|                                       |          | • Other (specify)                 |          |

c. How often is the IWS to be updated?

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(f)(1)] **SUO – Chapter 1145.02.064**

Yes	No
<b>X</b>	

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.).	<b>IU permit</b>		
b. What is the maximum term of the control mechanism?	<b>5 years</b>		
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? <b>Yes, local limits applied, key card system</b>	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).			
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 technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]	Partial Technical Evaluation (not all 10 pollutants evaluated)?						Yes
	Completed?						Concentration (ug/l)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)	X		X		X		125
b. Cadmium (Cd)	X		X		X		5.3
c. Chromium (Cr)	X		X		X		125
d. Copper (Cu)	X		X		X		21
e. Cyanide (CN)	X		X		X		13
f. Lead (Pb)	X		X		X		22
g. Mercury (Hg)	X		X		X		0.012
h. Molybdenum (Mo)	X		X		X		20,854
i. Nickel (Ni)	X		X		X		114
j. Selenium (Se)	X		X		X		5.2
k. Silver (Ag)	X		X		X		1.3
l. Zinc (Zn)	X		X		X		268
m. Other (Hex. Cr):	X		X		X		11
n. Other (Beryllium):	X		X		X		50

### E. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
<b>a. Inspections</b>				
• CIUs	1/year	1/year	1/year	1/year
• Other SIUs	1/year	1/year	1/year	1/year
<b>b. Sampling by POTW</b>				
• CIUs	1/year	1/year	1/year	1/year
• Other SIUs	1/year	1/year	1/year	1/year
<b>c. Self-monitoring</b>				
• CIUs	1/year	1/year	1/year	2/year
• Other SIUs	1/year	1/year	1/year	2/year
<b>d. Reporting by CIU</b>				
• CIUs	Quarterly	quarterly	quarterly	2/year
• Other SIUs	Quarterly	quarterly	quarterly	2/year

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			
1. Does the CA's program define "significant noncompliance"? <b>SUO Chapter 1145.02.065</b>	<input checked="" type="checkbox"/>		No
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	<input checked="" type="checkbox"/>		
If no, provide the CA's definition of "significant noncompliance."			
2. Does the CA have an approved, written ERP? [403.8(f)(5)] <b>10-24-2000</b>	<input checked="" type="checkbox"/>	Yes	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"/>	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 checked="" type="checkbox"/>	• Civil	<b>\$ 25,000/day/violation</b>
e. Termination of service	<input checked="" type="checkbox"/>	• Criminal	<b>\$ 5,000/day/violation</b> <b>6 months in jail</b>
		• Administrative	<b>\$ 1,000/day/violation</b>
J. DATA MANAGEMENT/PUBLIC PARTICIPATION			
1. Does the approved program describe how the POTW will manage its files and data?	<input checked="" type="checkbox"/>	Yes	No
<b>SUO, Chapter 1145.58 defines protocol. Hard copy files kept indefinitely. Electronic files kept five years &amp; backed-up every 24 hrs &amp; 3 years off-site.</b>			
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"/>	Yes	No
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]	<input checked="" type="checkbox"/>		
<b>SUO Chapter 1145.59</b>			

**ATTACHMENT B: PRETREATMENT PROGRAM PROFILE**

**K. RESOURCES**

1. What are the resource allocations for the following pretreatment program components: **12 pretreatment staff & 9 lab staff for both Jackson Pike and Southerly WWTPs. Budget - \$1,108,294; \$300,000 from general fund, rest from pretreatment program.**

	FTEs
a. Legal assistance	1
b. Permitting	2
c. Inspections	3
d. Sample collection	2
e. Sample analysis	9
f. Data analysis, review, and response	1
g. Enforcement	2
h. Administration?	1
<b>TOTAL</b>	<b>21</b>

2. Identify the sources of funding for the pretreatment program. [403.8(f)(3)] **Mostly self-supporting**

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

**L. ADDITIONAL INFORMATION**

*(This section is currently blank.)*

*gls*

ATTACHMENT B COMPLETED BY:	<b>Gregory L. Sanders</b>	DATE:	<b>3-20-12</b>
TITLE:	<b>Environmental Specialist</b>	TELEPHONE:	<b>614.728.3851</b>

### 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.

Category	Deficiencies and Required Actions
IU Characterization	• No deficiencies noted.
Control Mechanism	• No deficiencies noted.
Application of Pretreatment Standards	• No deficiencies noted.
Compliance Monitoring	• No deficiencies noted.
Enforcement Activities	• No deficiencies noted.
Program Modifications	• No deficiencies noted.