



**Environmental  
Protection Agency**

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

June 20, 2012

Mayor and Council  
City of Lancaster  
Municipal Building  
Lancaster, OH 43130

**Re: City of Lancaster, Fairfield County  
Industrial Pretreatment Compliance Inspection (PCI), May 1, 2012  
4PD00001\*KD / OH0026026**

Mayor and Council:

I conducted a Pretreatment Compliance Inspection (PCI) of the City of Lancaster's Industrial Pretreatment Program (IPP) on May 1, 2012. Jason Westfall 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 Lancaster is doing a good job of administering the program. The City of Lancaster has submitted required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according the schedule in the Lancaster NPDES permit for the PCI time period (December 1, 2009 through April 1, 2012).
2. No reportable non-compliance (RNC) was identified during the PCI. Lancaster met the minimum program frequency for conducting industrial user inspections during the inspection period. Industrial user self-monitoring and Lancaster independent user sampling have been conducted according to program requirements for the PCI time period.
3. Only one instance of industrial user significant non-compliance (SNC) occurred during the PCI time period. Ralston was in SNC for the first quarter of 2012. Appropriate action was taken by the City of Lancaster per your enforcement response plan.

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. 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 Lancaster Industrial Pretreatment Program Annual Report.
3. 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 actions that are needed by the City of Lancaster at this time. There are two recommended actions by this Agency. The recommended actions are as follows:

1. It is recommended to include a definition for "significant noncompliance" in your sewer use ordinance. It is recommended that the definition be consistent with the definition listed in Title 40 of the Code of Federal Regulations, Chapter 403.
2. It is recommended that your enforcement response plan (ERP) be reviewed and updated. It may be necessary for the ERP to be more stringent with higher fines for non-compliance of the industrial user permit.

Please acknowledge the receipt of this letter no later than August 15, 2012. Ohio EPA recognizes the continuing commitment demonstrated by you and Mr. Westfall 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,



Greg Sanders  
Environmental Specialist  
Division of Surface Water  
Central District Office

Enclosure: City of Lancaster PAI Forms

c: Jason Westfall, City of Lancaster  
Michael Nixon, City of Lancaster



Ohio Environmental Protection Agency

### PRETREATMENT INSPECTION REPORT

FACILITY NAME City of Lancaster		PERMIT NUMBER 4PD00001*KD	FACILITY NUMBER OH0026026
INSPECTION TYPE P	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED May 1, 2012

**GENERAL INFORMATION**

NAME AND LOCATION OF FACILITY  
 City of Lancaster WPCD  
 800 Lawrence Street  
 Lancaster, OH 43130-9401

MAILING ADDRESS OF FACILITY  
 Mayor and Council  
 City of Lancaster  
 Municipal Building  
 Lancaster, OH 43130

CONTACT (NAME/TITLE/PHONE)  
 Jason Westfall, Pretreatment Coordinator 740.687.6664  
 Michael Nixon, Superintendent

**FACILITY EVALUATION**

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

<b>S</b>	<b>Pretreatment Compliance Inspection (PCI) Report 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>5-7-12</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>6-16-12</b>

Form 3560

## WENDB AND RNC WORKSHEET

<b>FACILITY INFORMATION</b>	
Name <b>City of Lancaster WPCD</b>	
OH Number <b>OH0026026</b>	NPDES Number <b>4PD00001*KD</b>
Date of Inspection <b>May 1, 2012</b>	

<b>I. WENDB DATA SHEET</b>			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
	<b>Data</b>	<b>Checklist Reference</b>	<b>PCS Code</b>
Number of SIUs	7	II.C.1	SIUS
Number of CIUs	0	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	1	II.E.2	PSNC
Number of SIUs in SNC with self-monitoring	0	II.E.2	MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	II.E.2	SNIN

<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		

**CITY OF LANCASTER PRETREATMENT COMPLIANCE INSPECTION (PCI) CHECKLIST**

PCI CHECKLIST COMMENTS	
Cover page and Acronym List	
Section I	RI File Evaluation
Section II	Supplemental Data Review/Interview
Section III	Evaluation and Summary
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"/> MFCNDW/PRC 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 Lancaster WPCD 800 Lawrence Street Lancaster, OH 43130	May 1, 2012

INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number
Gregory L. Sanders	Ohio EPA, Environmental Specialist	614.728.3851
CA REPRESENTATIVE(S)		
Jason Westfall	Pretreatment Coordinator, City of Lancaster	740.687.6664

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
FDL	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   1   Industry name and address  
**Cintas**  
**P.O Box 631**  
**2250 Commerce Street**  
**Lancaster, OH 43110**

Type of industry  
**Industrial Laundry**  
**SIC #7218**  
**IU permit #P-040-LWPCD (2-1-10 to 1-31-13)**

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

Average total flow (gpd)                      Average process flow (gpd)  
**23,473 gpd**                                              **23,473 gpd**  
 Industry visited during audit?                      **Yes**

**COMPLIANCE STATUS**

SNC (period:            )     **Noncompliance/corrected**     Noncompliance/continuing     In compliance  
 Explanation:  
**Violations – O&G violation on 1-4-11, pH violations on 2-6-11, 6-8-11, 9-7-11 and 2-23-12. NOVs sent on 1-26-11, 2-10-11, 6-8-11 and 2-23-12 by control authority (CA).**

Comments:  
**Will Seabolt, Plant Manager; 740.687.6230**  
  
**Cintas is an industrial laundry facility.**  
**2 shifts per day (53 + 6 = 59 total employees) and 5 days per week**  
**5 holidays/year and day off after Thanksgiving, Christmas and New Year.**  
**Flows (gpd); process – 23,473 gpd. Uses 40,000 gpd of city water.**  
  
**IU permit limits – see attached table; local limits given. IU permit issued because flow greater than 25,000 gpd and reasonable potential to affect WWTP.**  
**Schematic obtained during annual inspection. SPCC dated 2-14-08 in file.**  
**Phone calls logged and placed in file.**  
**Pretreatment system includes dissolved air flotation (DAF) with chemical flocculation and precipitation.**  
**O&G separated into sludge and hauled by Waste Management.**  
**Approximately 20 cubic yards of sludge generated per month.**  
**Cintas submitted pretreatment question survey on 1-08-10.**  
**Sampling by CA is monthly at outfall weir overflow on DAF.**  
**24-hr composite sampling for metals, CBOD & TNFR; grab sampling for O&G, pH & Cyanide**  
**Cintas uses TCCI Laboratories, Inc. for lab/consulting.**  
**Last IU inspection by CA on December 12, 2011.**

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

FILE <u>2</u> Industry name and address <b>Fairfield Medical Center</b> <b>401 North Ewing Street</b> <b>Lancaster, OH 43130</b>	Type of industry <b>Hospital and lab</b> <b>SIC 8062</b> <b>IU Permit #P-032-LWPCD (3-2-2012 to 3-1-2015)</b>	
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU Category(ies) _____ <input checked="" type="checkbox"/> <b>Non-categorical SIU</b> <input type="checkbox"/> Non SIU	Average total flow (gpd) <b>115,630 gpd</b>	Average process flow (gpd) <b>115,630 gpd</b>
	Industry visited during audit?      Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

**COMPLIANCE STATUS**

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

**EXPLANATION: No violations noted in 2011.**

**Comments;**

**David Chenault, Environmental Safety Coordinator; 740.687.6925**

**Fairfield Medical Center is a hospital and has a laboratory.**

**3 shifts per day (1221 + 648 + 177 = 2,046 total employees) and 7 days per week**

**Flows (gpd); sanitary and laboratory – 115,630 gpd. Uses 102,688 gpd of city water.**

**IU permit limits – see attached table; local limits given. IU permit issued because flow greater than 25,000 gpd and reasonable potential to affect WWTP.**

**Schematic obtained during annual inspection. SPCC dated February 2008 in file. MSDS on file.**

**Phone calls logged and placed in file.**

**No pretreatment system, neutralization tank for laboratory waste recently removed and laboratory waste is now discharged directly to sanitary sewer. Incineration no longer done at hospital. Scrubber will be removed later this year.**

**Fairfield Medical Center submitted pretreatment question survey on 12-06-11.**

**Sampling by CA is bi-monthly at manhole west of truck dock, where hospital laundry facility discharges to manhole.**

**24-hr composite sampling for metals, CBOD & TNFR; grab sampling for O&G & Cyanide**

**pH was not listed as grab sample but taken as grab sample. Will be added as grab sample in the next permit.**

**Last IU inspection by CA on December 15, 2011.**

FILE <u>3</u> Industry name and address <b>Ralston Foods Inc.</b> <b>3775 Lancaster-New Lexington Road</b> <b>Lancaster, OH 43130</b>		Type of industry <b>Manufactures breakfast cereal</b> <b>SIC 2043</b> <b>IU permit #P-008-LWPCD (6-1-2009 to 5-31-2012)</b>	
IU CLASSIFICATION BY CA <input type="checkbox"/> CIU 40 CFR _____, _____ Category(ies) _____ <input checked="" type="checkbox"/> <b>Non-categorical SIU</b> <input type="checkbox"/> Non SIU		Average total flow (gpd) <b>1,009,000 gpd</b>	Average process flow (gpd) <b>63,293 gpd</b>
		Industry visited during audit?    Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>COMPLIANCE STATUS</b>			
<input checked="" type="checkbox"/> <b>SNC (period: 1-1-12 to 4-1-12)</b> <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance			
EXPLANATION: O&G violations on 12-2011, and 3/2012. (See additional violations '---')			
Comments <b>Paul Jagdeo, Environmental Coordinator; 740.681.3254</b>			
<b>Ralston Foods manufactures breakfast cereals.</b>			
<b>Raw materials used are grains flours, sugar, corn syrup, detergents and cleaners.</b>			
<b>3 shifts per day (195 + 102 + 102 = 399 total employees) and 5 days per week</b>			
<b>Flows (gpd); sanitary – 275,000, NCCW – 40,000, process – 35,000, rinse 659,000 = 1,009,000 gpd.</b>			
<b>IU permit limits – see attached table; local limits given. IU permit issued because flow greater than 25,000 gpd and reasonable potential to affect WWTP.</b>			
<b>Schematic submitted with pretreatment survey questionnaire dated 4-9-09.</b>			
<b>SPCC dated January 2008 in file. MSDS in file.</b>			
<b>Phone calls logged and placed in file.</b>			
<b>Pretreatment system includes enhanced air flotation (EAF) with flocculation addition and pH adjustment.</b>			
<b>No longer using acid and caustic in pretreatment. Now using aluminum sulfate and magnesium hydroxide.</b>			
<b>Oil skimmed from effluent, about 3,000 to 3,500 pounds per year is taken to Perma Fix in Dayton.</b>			
<b>Approximately 6,000 gallons of sludge per year is taken to Suburban Landfill.</b>			
<b>Approximately 500 gallons of used oil is generated per year.</b>			
<b>Sampling by CA is three times a month at first manhole north of gate 3 along east side of facility.</b>			
<b>24-hr composite sampling for metals, CBOD &amp; TNFR; grab sampling for O&amp;G, pH &amp; Cyanide</b>			
<b>Last IU inspection by CA on December 7, 2011. Checked effluent meter calibration during inspection.</b>			
<b>Received plant schematic during inspection.</b>			
<b>Slug load of blue dye discharged on 12-8-10.</b>			
<b>Slug load of oil discharged on 5-12-11. NOV sent by CA on 5-16-11.</b>			
<b>Violations of O&amp;G (190 mg/l) and pH on 12-13-11. NOV sent by CA on 12-14-11.</b>			
<b>O&amp;G violation (233 mg/l) on 3-20-12. NOV sent by CA on 4-6-12.</b>			
<b>Last two O&amp;G violations put them in technical review criteria (TRC). Will be in SNC for 1<sup>st</sup> quarter of 2012.</b>			

Comments

<b>IU Permit Limits:</b>	<b>Cintas</b>	<b>Fairfield Medical Center</b>	<b>Ralston Foods</b>
<b>CBOD</b>	200 mg/l	200 mg/l	200 mg/l
<b>TNFR</b>	300 mg/l	300 mg/l	300 mg/l
<b>pH</b>	5.5-10 s.u.	5.5-10 s.u.	5.5-10 s.u.
<b>O&amp;G</b>	100 mg/l	100 mg/l	100 mg/l
<b>Arsenic</b>	43 ug/l	43 ug/l	43 ug/l
<b>Cadmium</b>	300 ug/l	272 ug/l	100 ug/l
<b>Total Chromium</b>	803 ug/l	755 ug/l	549 ug/l
<b>Copper</b>	1275 ug/l	656 ug/l	1172 ug/l
<b>Cyanide</b>	136 ug/l	136 ug/l	136 ug/l
<b>Lead</b>	2024 ug/l	770 ug/l	641 ug/l
<b>Mercury</b>	0.2 ug/l	0.2 ug/l	0.2 ug/l
<b>Nickel</b>	294 ug/l	81 ug/l	181 ug/l
<b>Zinc</b>	1568 ug/l	876 ug/l	1974 ug/l

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
File 1	File 2	File 3	File	File		
					<b>SECTION I: IU FILE REVIEW</b>	
					<b>A. ISSUANCE OF IU CONTROL MECHANISM</b>	
X	X	X			1. Control mechanism application form	
X	X	X			2. Proper IU categorization (sig cat, sig non sig, non sig)	
X	X	X			3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					4. Control mechanism contents	403.8(f)(1)(iii)
X	X	X			a. Statement of duration ( $\leq 5$ years)	403.8(f)(1)(iii)(A)
X	X	X			b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)
					c. Applicable effluent limits	403.8(f)(1)(iii)(C)
n/a	n/a	n/a			• Application of applicable categorical standards	403.8(f)(1)(ii)
n/a	n/a	n/a			-Classification by category/subcategory	
n/a	n/a	n/a			-Classification as new/existing source	
n/a	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 OWP or FWA	403.6(d)&(e)
X	X	X			• Application of applicable local limits	
n/a	n/a	n/a			c. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					<b>A. ISSUANCE OF IU CONTROL MEET ISM (Continued)</b>	
					<b>d. IU self-monitoring requirements</b>	403.8(f)(1)(iii)(D)
X	X	X			• Identification of parameters to be monitored	
X	X	X			• Sampling frequency	
X	X	X			• Sampling location/discharge points defined	
X	X	X			• Reporting requirements	
X	X	X			• Appropriate sample types (grab or composite)	
X	X	X			• Record keeping requirements	403.12(o)
X	X	X			e. Sub-trials (if applicable) and critical parameters	403.8(f)(1)(iii)(E)
n/a	n/a	n/a			<b>f. Compliance schedules/progress reports (if applicable)</b>	
X	X	X			g. Requirement to notify CA of slug loadings	
X	X	X			<b>h. Requirement to notify CA of spills, bypasses, upsets, etc.</b>	
X	X	X			i. Requirement to notify CA of significant change in discharge	
X	X	X			<b>j. 24-hour notification of violation/resample requirement</b>	403.8(f)(1)(iii)(D)
X	X	X			<b>k. Slug discharge control plan requirement (if applicable)</b>	403.8(f)(3)(v)
Comments						

File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					<b>B. CA COMPLIANCE MONITORING</b>	
					<b>1. Inspection</b>	
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 (re-evaluation of existing plan)	403.8(f)(2)(v)
					<b>2. Sampling</b>	
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 substances	403.8(f)(2)(v)
X	X	X			d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
Comments						

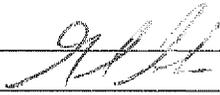
File 1	File 2	File 3	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					<b>C. CA ENFORCEMENT ACTIVITIES</b>	
					<b>1. Identification of and response to violations</b>	403.8(f)(2)(vi)
X	n/a	X			a. Discharge violations	
X	n/a	X			• IU self-monitoring	
X	n/a	X			• CA compliance monitoring	
X	n/a	X			b. Monitoring/reporting violations	
X	n/a	X			• IU self-monitoring	
X	n/a	X			-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
X	n/a	X			-Sampling (e.g., frequency, pollutants)	
X	n/a	X			-TTO requirements met	
X	n/a	X			• Notification	
X	n/a	X			-Notified CA of significant change in operation or discharge	403.12(j)
X	n/a	X			-Immediate notification of slug load discharge or accidental spill	OAC 3745-3-05
X	n/a	X			-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
n/a	n/a	n/a			-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
X	X	X			• Submission/implementation of slug discharge control plan	403.8(f)(2)(vi)
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
<b>C. CA ENFORCEMENT ACTIVITIES (Continued)</b>						
X	n/a	X			2. Proper calculation of SNC	403.8(f)(2)(vii)
n/a	n/a	n/a			a. Chronic	
X	n/a	X			b. TRC	
n/a	n/a	X			c. Post through/interference	
n/a	n/a	X			d. Spill/slug load	
n/a	n/a	n/a			e. Reporting	
n/a	n/a	n/a			f. Compliance schedule	
n/a	n/a	n/a			g. Other violations (specify)	
X	n/a	X			3. Adherence to approved ERP	
X	n/a	X			a. Proper response to violation	403.8(f)(5)
X	n/a	X			b. Escalation of enforcement	403.8(f)(5)
n/a	n/a	n/a			4. Return to compliance	
n/a	n/a	n/a			a. Within 90 days	
n/a	n/a	n/a			b. Within time specified	
n/a	n/a	n/a			c. Through compliance schedule	
n/a	n/a	X			5. Publication for SNC	403.8(f)(2)(vii)
n/a	n/a	n/a			<b>D. OTHER</b>	

Comments

Add pH as grab sample for the Fairfield Medical Center industrial user permit.

SECTION I COMPLETED BY:	Gregory L. Sanders 	DATE:	5-7-12
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 [06/11]

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.) **Current NPDES permit expires May 31, 2012. Plans to re-evaluate local limits, sewer use ordinance and other documents used in the pretreatment program after new permit issued.**

**Increased sampling frequency of US Corrugated. Toxco and SRI expanding production and will need to revise permit.**

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

Yes	No
	<b>X</b>

### B. LEGAL AUTHORITY [06/11]

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

Yes	No
<b>X</b>	

If yes, explain how these multi-jurisdictional agreements have been incorporated

into your approved program. **Greenfield Township is an area served outside of city limits. The new Upper Hocking wastewater treatment plant constructed by the City and put on-line around October 2011. The Upper Hocking plant serves Greenfield Township, Mondri Packaging, Crown Cork and Seal which are sampled and serves Norwesco and YSI. The Lawrence Street facility serves all other industrial users.**

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
	<b>X</b>

If yes, explain.

**C. IU CHARACTERIZATION** [403.87(d)(1)(ii)]

1. Have you changed how SIUs are classified? **Yes, revised classifications to be similar to 40 CFR Chapter 403. IUs are either classified as significant or non-significant. Change previous classification of minor and intermediate users to non-significant industrial users.**

2. a. How do you identify and classify new IUs? (i.e., Industrial Waste Survey); **use pretreatment survey questionnaire (PSQ) and then sample for three months.**

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

**D. CONTROL MECHANISM EVALUATION** [403.87(d)(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 %
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:

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

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

c. Describe your program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)] **hauled waste has local limits applied and one discharge point to new septage receiving station.**

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

**E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS**

1. How do you keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]  
**Through operator course work and keeping up on required operator training.**

Local limits evaluation: [403.8(f)(4); 122.21(j)]

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?

Yes	No
	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-III]  
 (Define the 12 month period **January 1, 2011 to December 31, 2011.**) **all SIUs sampled & inspected.**

- 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 %

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

2. Who performs your compliance sampling and analysis? **Samples split w/Mondi for metals. Mondi uses Alpha Omega.**

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

Sampling	Analysis
City of Lancaster	City of Lancaster
City of Lancaster	City of Lancaster
City of Lancaster	City of Lancaster
City of Lancaster	City of Lancaster
City of Lancaster	Test America

**Upper Hocking treatment plant uses Pace for lab. The long-time chemist at Lawrence Street facility retired and samples were out-sourced to lab for metals for three months in 2011.**

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)]  
**Splits and DMR 20 used. Splits also done w/Toxco on batch discharges. Toxco has their own lab.**

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)] **at every annual inspection.**

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

<b>all</b>
------------

**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		<b>W after storm event – continue to work on issue</b>
• 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: **W work continues as well as sewer separation and express sewer.**

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)]  
**No, but have ability to use them.**

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

Yes	No
	X

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

a. Date of last modification: **October 2, 2002**

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.  
**Yes, but continuing to review and upgrade plan. It is recommended that it is updated.**

**H. DATA MANAGEMENT/PUBLIC PARTICIPATION**

1. How are requests for confidentiality handled?[403.14] **Local ordinance sets protocol in Chapter 916.10(e).**

2. How are requests by the public to review pretreatment files handled (including confidential information)?  
**Local ordinance sets protocol for confidential information.**

3. a. Describe your data management system regarding pretreatment implementation and enforcement activities.  
(e.g., computerization, file system, etc.) **Some files hard copy, some electronically.**

b. How long are records maintained? [403.12(o)] **Files kept indefinitely.**

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

5. Explain any community issues impacting the pretreatment program.(I. e., economics, politics, new development, etc.)  
**Economy**

**I. RE SOURCES [403.700]**

1. Estimate the number of personnel available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sampling and analysis, enforcement, and administration].

**1**

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

Yes

No

**X**

3. Discuss any problems in program implementation which appear to be related to inadequate resources.  
(i.e., finances, equipment, personnel, training, etc.) **No problems**

**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? 

Yes	No
	X

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

Yes	No
	X

  
 Explain.

4. What efforts have been taken to incorporate pollution prevention into the pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)? **On-line brochure detailing problems with fats, oils & grease going to sanitary sewer.**

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

Yes	No
	X

  
 Explain.

**K. ADDITIONAL EVALUATIONS/INFORMATION**

**FOG program has not expanded in last few years, still get help from local health department on new food service programs. City ordinance requires the grease traps to be cleaned every 90 days.**

SECTION II COMPLETED BY:	<b>Gregory L. Sanders</b> <i>GLS</i>	DATE:	<b>5-7-12</b>
TITLE:	<b>Environmental Specialist</b>	TELEPHONE:	<b>614.728.3851</b>



**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>City of Lancaster WPCD</b>		2. Location address: <b>800 Lawrence Street, Lancaster, OH 43130</b>		
3. a. NPDES permit number <b>4PD00001*KD OH 0026026</b>	b. Expiration date <b>5/31/2012</b>	4. Treatment plant wastewater flows		
		Design <span style="border: 1px solid black; padding: 2px 10px;">10.0</span> MGD	Actual <span style="border: 1px solid black; padding: 2px 10px;">6.6</span> MGD	
5. Sewer System	a. Separate % <b>90%</b>	b. Combined % <b>10%</b>	c. Number of CSOs <b>12</b>	
6. a. Industrial contribution (MGD)  <b>0.550</b>	b. Number of S/Us discharging to plant  <b>7</b>	c. Percent industrial flow to plant		
		% Non-domestic Flow	% Industrial Flow <b>8.4%</b>	
7. Level of treatment	Type of Process(es)			
a. Primary	<b>Influent pumping, bar screen, grit &amp; scum removal, flow EQ &amp; primary settling</b>			
b. Secondary	<b>Trickling filters, conventional activated sludge, secondary clarifiers</b>			
c. Tertiary	<b>Chlorination/dechlorination &amp; post aeration</b>			
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.				
	<b>Influent (Times/Year)</b>	<b>Effluent (Times/Year)</b>	<b>Sludge (Times/Year)</b>	<b>Receiving Stream (Times/Year)</b>
a. Metals	<b>1/qtr</b>	<b>1/qtr</b>	<b>1/mn</b>	<b>1/mn</b>
b. Organics	<b>3/week</b>	<b>1/mn</b>	<b>1/mn</b>	<b>1/mn</b>
c. Toxicity testing	-	-	-	-
d. EP toxicity	-	-	-	-
e. TCLP	-	-	-	-
9. Effluent Discharge				
a. Receiving water name <b>Hocking 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

C. TREATMENT PLANT INFORMATION (Continued)		
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
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]		No
b. Has there been a pattern of toxicity demonstrated?		X
12. Indicate methods of sludge disposal.		
a. Land application	Quantity of sludge <b>827</b>	dry tons/year
b. Incineration		dry tons/year
c. Monofill		dry tons/year
d. MSW landfill		dry tons/year
e. Public distribution		dry tons/year
f. Lagoon storage		dry tons/year
g. Other (specify)		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). <b>Codified Ordinance of the City of Lancaster; Chapter 916</b>		
b. Date enacted/adopted: <b>October 22, 1984</b>	c. Date of most recent revisions: <b>August 25, 2008</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
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>1</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>Greenfield Township</b>	<b>0</b>	<b>0</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	
	<input checked="" type="checkbox"/>		
If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).			
<b>Agreement with Greenfield Township to serve them with sanitary sewer, no industry served.</b>			
4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform. <b>N/A</b>			
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)(1)]	Yes	No	
	<input checked="" type="checkbox"/>		
b. Indicate which methods are to be used to update the IWS.			
• Review of newspaper/phone book	<input checked="" type="checkbox"/>	• Onsite inspections	<input checked="" type="checkbox"/>
• Review of water billing records	<input checked="" type="checkbox"/>	• Permit application requirements	<input checked="" type="checkbox"/>
• Review of plumbing/building permits	<input checked="" type="checkbox"/>	• Citizens involvement	<input checked="" type="checkbox"/>
		• Other (specify)	<input checked="" type="checkbox"/>
c. How often is the IWS to be updated?			
	<input checked="" type="checkbox"/>		
2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(t)(1)]			
	Yes	No	
		<input checked="" type="checkbox"/>	
If no, provide the CA's definition of "significant industrial user."			
<b>Revised definition in local ordinance to be an industry discharging greater than 25,000 gallons per day or an industry that has a potential to upset the wastewater treatment plant. Also, changed classification from minor and intermediate to non-significant industrial user.</b>			

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

F. CONTROL MECHANISM			
1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).	IU permit 3 years		
b. What is the maximum term of the control mechanism?			
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).			
<b>Hauled wastes discharged to a septage receiving station with an isolated tank.</b>			
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? <b>Yes, new Upper Hocking WWTP recently constructed.</b>	N/A	Yes	No
		X	

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

### G. APPLICATION OF STANDARDS (Continued)

3. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL]  
[403.5(c)(1), 403.8(f)(4)]

10/21/08

Partial Technical Evaluation (not all 10 pollutants evaluated)?

	Groundwater Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limits (µg/l)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)	X		X		X		174
b. Cadmium (Cd)	X		X		X		7.5
c. Chromium (Cr)	X		X		X		195
d. Copper (Cu)	X		X		X		31
e. Cyanide (CN)	X		X		X		14
f. Lead (Pb)	X		X		X		35
g. Mercury (Hg)	X		X		X		0.012
h. Molybdenum (Mo)	X		X		X		23310
i. Nickel (Ni)	X		X		X		175
j. Selenium (Se)	X		X		X		5.83
k. Silver (Ag)	X		X		X		-
l. Zinc (Zn)	X		X		X		381
m. Other (Antimony):							221

### H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
a. Inspections				
• CIUs	1/yr	1/yr	1/yr	1/year
• Other SIUs	1/yr	1/yr	1/yr	1/year
b. Sampling by POTW				
• CIUs	Bi-monthly to 1/qtr	1/yr	1/yr	1/year
• Other SIUs	varies	1/yr	1/yr	1/year
c. Self-monitoring				
• CIUs	N/A	N/A	2/yr	2/year
• Other SIUs	N/A	N/A	2/yr	2/year
d. Reporting by IU				
• CIUs	N/A	N/A	2/yr	2/year
• Other SIUs	N/A	N/A	2/yr	2/year

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT			
1. Does the CA's program define "significant noncompliance"?		No	
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]		X	
If no, provide the CA's definition of "significant noncompliance."			
No written definition, but understood to be same as 40 CFR 403. Plan to include in SUO.			
2. Does the CA have an approved, written ERP? [403.8(f)(5)] April 14, 2002		Yes X	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	<u>\$ 1000/day/violation</u>
e. Termination of service	<input checked="" type="checkbox"/>	• Criminal	<u>\$ 1000/day/violation</u> <b>6 months in jail</b>
		• Administrative	<u>\$ 1000/day/violation</u>
J. DATA MANAGEMENT/PUBLIC PARTICIPATION			
1. Does the approved program describe how the POTW will manage its files and data?		Yes	No
Files are kept computerized & hard copy. They are kept indefinitely. City backs up electronic files monthly.		X	
Are files/records		computerized?	X
		hard copy?	X
2. Are program records available to the public?		Yes	No
		X	
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)] Chapter 916.10 (e)		Yes	No
		X	

## ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

RESOURCES	
1. What are the resource allocations for the following pretreatment program components:	
a. Legal assistance	0.1
b. Permitting	0.4
c. Inspections	0.1
d. Sample collection	0.1
e. Sample analysis	0.1
f. Data analysis, review, and response	0.1
g. Enforcement	0.1
h. Administration?	0.1
<b>TOTAL</b>	<b>1.0</b>
2. Identify the sources of funding for the pretreatment program. [403.8(f)(3)]	
a. POTW general operating fund	<input checked="" type="checkbox"/>
b. IU permit fees	<input checked="" type="checkbox"/>
c. Industry surcharges	<input checked="" type="checkbox"/>
d. Monitoring charges	<input type="checkbox"/>
e. Other (specify)	<input type="checkbox"/>
<b>ADDITIONAL INFORMATION:</b>	
<b>Recommended to update enforcement response plan (ERP) and to include definition of significant non-compliance in sewer use ordinance.</b>	

*Gregory L. Sanders*

ATTACHMENT B COMPLETED BY:	Gregory L. Sanders	DATE:	5-7-12
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 IDENTIFIED
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.