



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

Re: Lucas County  
Maumee River WWTP  
Pretreatment

December 7, 2012

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

Dear Mr. Shaw:

On November 16, 2012, Naajy Abdullah conducted a Pretreatment Audit of the County's approved program. The Audit followed a checklist designed to evaluate the major aspects of the program. Selected industrial user (IU) files were reviewed. An industrial user inspection was also conducted. The Audit findings are summarized below:

1. All sampling and inspections of IUs were conducted as required by the approved pretreatment program.
2. Review of selected IU files indicates proper administration of the permits and enforcement program.
3. The program's coordinator conducted a proper IU inspection.

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

Yours truly,

A handwritten signature in black ink, appearing to read "Elizabeth A. Wick".

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

NSA/jlm  
Enclosure

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



## PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

<b>FACILITY NAME</b> <i>Maumee River WWTP</i>	<b>PERMIT NUMBER</b> <i>2PK00000</i>	<b>FACILITY NUMBER</b> <i>OH0034223</i>
<b>INSPECTION TYPE</b> <i>PA</i>	<b>INSPECTOR</b> <i>S</i>	<b>FACILITY TYPE</b> <i>1</i>
		<b>DATE CONDUCTED</b> <i>11/16/2012</i>

<b>GENERAL INFORMATION</b>
<b>NAME AND LOCATION OF FACILITY</b> Lucas County Maumee River WWTP 5757 North River Road Waterville, Ohio 43566
<b>MAILING ADDRESS OF FACILITY</b> 5757 North River Road Waterville, Ohio 43566
<b>CONTACT (NAME/TITLE/PHONE)</b> Jason Collins/ Pretreatment coordinator/ (419) 213-8745

<b>FACILITY EVALUATION</b>													
(S = Satisfactory, M = Marginal, U = Unsatisfactory)													
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">S</td> <td>IU permits</td> </tr> <tr> <td style="text-align: center;">S</td> <td>IU Inspection Program</td> </tr> <tr> <td style="text-align: center;">S</td> <td>Enforcement Program</td> </tr> </table>	S	IU permits	S	IU Inspection Program	S	Enforcement Program	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">S</td> <td>IU Monitoring Program</td> </tr> <tr> <td style="text-align: center;"> </td> <td> </td> </tr> <tr> <td style="text-align: center;"> </td> <td> </td> </tr> </table>	S	IU Monitoring Program				
S	IU permits												
S	IU Inspection Program												
S	Enforcement Program												
S	IU Monitoring Program												
* See inspection letter													

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
<i>Naajy Abdulrah</i> Naajy Abdulrah, P.E.	Ohio EPA/ NWDO/ (419) 373-3017	11/16/2012
Signature of Reviewer <i>Thomas Pofflyger</i>	OHIO EPA/NWDO/ 419-373-3000	Date 11/30/12

## PRETREATMENT AUDIT CHECKLIST

### AUDIT CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation

Section II Interview

Section III Evaluation and Summary

Attachment A Pretreatment Program Status Update

Attachment B Pretreatment Program Profile

Attachment C Worksheets

WENDB/ RNC Worksheet (Required)

IU Site Visit Report Form (Optional)

File Review Worksheets (Optional)

Attachment D Supporting Documentation

Control Authority (CA) name and address		Date(s) of Audit
<i>Lucas County Maumee River WWTP 5757 North River Road Waterville, Ohio 43566</i>		11/16/2012
<b>INSPECTOR(S)</b>		
Name	Title/Affiliation	Telephone Number
<b>Naajy Abdullah</b>	<b>Environmental Specialist/ Ohio EPA</b>	<b>(419) 373-3017</b>
<b>CA REPRESENTATIVE(S)</b>		
Name	Title/Affiliation	Telephone Number
<b>Jason Collins</b>	<b>Pretreatment Coordinator/ Maumee River WWTP</b>	<b>(419) 213-8745</b>

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

**SECTION I: IU IDENTIFICATION**

FILE <u>  1  </u> Industry name and address <b>Metal Forming &amp; Coining</b>  <b>1007 Illinois Ave.</b> <b>Maumee, Ohio 43537</b>	Type of industry <b>Stamping, grinding, roto-tumbling, phosphating and cold forging of steel parts for the automotive industry.</b>						
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR <u>  433  </u> , <u>  17  </u> , Category(ies) _____  <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Average total flow (gpd)</td> <td style="width:50%;">Average process flow (gpd)</td> </tr> <tr> <td align="center"><b>24,000</b></td> <td align="center"><b>18,500</b></td> </tr> <tr> <td colspan="2">Industry visited during audit?    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</td> </tr> </table>	Average total flow (gpd)	Average process flow (gpd)	<b>24,000</b>	<b>18,500</b>	Industry visited during audit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Average total flow (gpd)	Average process flow (gpd)						
<b>24,000</b>	<b>18,500</b>						
Industry visited during audit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							

**COMPLIANCE STATUS**

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

EXPLANATION:

Comments

FILE <u>  2  </u> Industry name and address <b>Rexam Beverage Can Company</b>  <b>10444 Waterville Street</b> <b>Whitehouse, Ohio 43571</b>	Type of industry <b>Manufacturer of seamless beverage cans of steel and aluminum</b>						
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> CIU 40 CFR <u>  465  </u> , <u>  44  </u> , Category(ies) _____  <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Average total flow (gpd)</td> <td style="width:50%;">Average process flow (gpd)</td> </tr> <tr> <td></td> <td align="center"><b>68,000</b></td> </tr> <tr> <td colspan="2">Industry visited during audit?    <input type="checkbox"/> Yes    <input checked="" type="checkbox"/> No</td> </tr> </table>	Average total flow (gpd)	Average process flow (gpd)		<b>68,000</b>	Industry visited during audit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Average total flow (gpd)	Average process flow (gpd)						
	<b>68,000</b>						
Industry visited during audit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							

**COMPLIANCE STATUS**

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

EXPLANATION:

Comments

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

FILE ____ Industry name and address	Type of industry
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU 40 CFR _____, _____ Category(ies) _____	Average total flow (gpd)      Average process flow (gpd)
<input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Industry visited during audit?    Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>COMPLIANCE STATUS</b>	
<input type="checkbox"/> SNC (period:      ) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance EXPLANATION:	
Comments	
FILE ____ Industry name and address	Type of industry
IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU 40 CFR _____, _____ Category(ies) _____	Average total flow (gpd)      Average process flow (gpd)
<input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Industry visited during audit?    Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>COMPLIANCE STATUS</b>	
<input type="checkbox"/> SNC (period:      ) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance EXPLANATION:	
Comments:	

Industry Name					
					<p><b>INSTRUCTIONS:</b> 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.</p>

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
y	y				1. Control mechanism application form	
y	y				2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
y	y				3. Issuance or reissuance of control mechanism	403.8(f)(1)(ii)
					4. Control mechanism contents	403.8(f)(1)(ii)
y	y				a. Statement of duration (≤ 5 years)	403.8(f)(1)(ii)(A)
y	y				b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(ii)(B)
y	y				c. Applicable effluent limits	403.8(f)(1)(ii)(C)
y	y				• Application of applicable categorical standards	403.8(f)(1)(i)
					- Classification by category/subcategory	
					- Classification as new/existing source	
y	y				- Application of limits for all categorical pollutants	
y	N/A				- Application of TFO or TOMP alternative	
N/A	N/A				- Calculation and application of production-based standards	403.6
N/A	N/A				- Calculation and application of CWF or FWA	403.5(d)&(e)
y	y				• Application of applicable local limits	
N/A	N/A				• Application of most stringent limit	403.8(f)(1)(ii)

Comments

File <u>1</u>	File <u>2</u>	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	
					<b>d. IU self-monitoring requirements</b>	403.80(1)(B)(D)
y	y				• Identification of pollutants to be monitored	
y	y				• Sampling frequency	
y	y				• Sampling locations/discharge points defined	
y	y				• Reporting requirements	
y	y				• Appropriate sample types (grab or composite)	
y	y				• Record keeping requirements	403.12(o)
y	y				e. Statement of applicable civil and criminal penalties	403.80(1)(B)(E)
N/A	N/A				f. Compliance schedules/progress reports (if applicable)	
y	y				g. Requirement to notify CA of slug loadings	
y	y				h. Requirement to notify CA of spills, bypasses, upsets, etc.	
y	y				i. Requirement to notify CA of significant change in discharge	
y	y				j. 24-hour notification of violation/resample requirement	403.80(1)(B)(F)
N/A	N/A				k. Slug discharge control plan requirement (if applicable)	403.80(2)(v)
<b>Comments</b>						

File <u>1</u>	File <u>2</u>	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					B. CA COMPLIANCE MONITORING	
					1. Inspection	
y	y				a. Inspection at frequency specified in approved program	403.8
y	y				b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
y	y				c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
					2. Sampling	
y	y				a. Sampling at frequency specified in approved program	403.8
y	y				b. Documentation of sampling activities (chain-of-custody; Q/VOC)	403.8(f)(2)(vi)
y	y				c. Analysis for all regulated parameters	403.12(e)(1)
y	y				d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)

Comments

File <u>1</u>	File <u>2</u>	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES	
					1. Identification of and response to violations	403.8102(a)(1)
y	y				a. Discharge violations	
N/A	N/A				• IU self-monitoring	
y	y				• CA compliance monitoring	
					b. Monitoring/reporting violations	
y	y				• IU self-monitoring	
N/A	N/A				-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
N/A	N/A				-Sampling (e.g., frequency, pollutants)	
y	N/A				-I/O requirements met	
					• Notification	
N/A	N/A				-Notified CA of significant change in operation or discharge	403.12(j)
N/A	N/A				-Immediate notification of slug load discharge or accidental spill	OAC 3745-3-05
y	N/A				<b>-24 hour notification after becoming aware of discharge violations</b>	403.12(g)(2)
y	N/A				-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
N/A	N/A				• Submission/implementation of slug discharge control plan	403.8102(a)(1)
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 <u>1</u>	File <u>2</u>	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES (Continued)	
N/A	N/A				2. Proper calculation of SNC	403.8(f)(2)(vii)
					a. Chronic	
					b. TRC	
					c. Pass through/interference	
					d. Spill/slug load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (specify)	
y	y				3. Adherence to approved ERP	
y	y				a. Proper response to violation	403.8(f)(5)
N/A	N/A				b. Escalation of enforcement	403.8(f)(5)
y	y				4. Return to compliance	
y	y				a. Within 90 days	
y	y				b. Within time specified	
N/A	N/A				c. Through compliance schedule	
					5. Publication for SNC	403.8(f)(2)(vii)
					D. OTHER	
Comments						

SECTION I COMPLETED BY: Naajy Abdullah	DATE: 11/16/2012
TITLE: Environmental Specialist	TELEPHONE: (419) 373-3017

**SECTION II: INTERVIEW**

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

**A. CA PRETREATMENT PROGRAM MODIFICATIONS [403.18]**

1. a. Describe any changes pending or completed made to the pretreatment program since the last inspection. (e.g., legal authority, local limits, multi-jurisdictional agreements, ERP, sewer use ordinance, control mechanism, etc.)

**Evaluation to local limits was submitted and approved by Ohio EPA**

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

Yes	No
	X

**B. LEGAL AUTHORITY [403.8(f)(1)]**

1. Are there any contributing jurisdictions discharging wastewater to the POTW?  
If yes, explain how these multi-jurisdictional agreements have been incorporated into your approved program.

Yes	No
X	

*With the initial approval of the program*

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
	N

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

1. Have you changed how SIUs are classified?

No.

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

\*Industrial waste survey

\* Processes producing wastewater

\*process wastewater flow rate

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

\*Annual Inspections

\*Notification by IU.

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

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

Number	Percent
<b>0</b>	<b>0%</b>

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.

2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW?

Yes	No
	<b>X</b>

b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss:

**D. CONTROL MECHANISM EVALUATION (Continued)**

Yes	No
	<b>X</b>

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)]

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)]

N/A

**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)]

Subscribe to Federal Regulations bulletins on changes

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

Yes	No
	<b>X</b>

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?

3. What problems, if any, were raised during local limit implementation or reissuance of industrial permits? How were these problems addressed?

None

**F. COMPLIANCE MONITORING**

1. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)][RNC-II]  
 (Define the 12 month period 11/1/2011 to 1/11/2012.)

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

0	0%
0	0%
0	0%
0	0%

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

2. Who performs your compliance sampling and analysis?

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

Sampling	Analysis
<i>County POTW</i>	<i>Jone &amp; Henry Labs</i>
<i>County POTW</i>	<i>Jones &amp; Henry Labs</i>
<i>County POTW</i>	<i>Jones &amp; Henry Labs</i>
<i>County POTW</i>	<i>Jones &amp; Henry Labs</i>

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)]

**Use split samples**

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)]

**During the annual inspection. The chemical storage and discharge method is reviewed to determine the potential for a slug load**

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

0
---

**G. ENFORCEMENT**

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

	Yes	No	Explain
• Interference		<b>X</b>	
• Pass through		<b>X</b>	
• Fire or Explosions		<b>X</b>	
• Corrosive structural damage		<b>X</b>	
• Flow obstructions		<b>X</b>	
• Excessive flow rates		<b>X</b>	
• Excessive pollutant concentrations		<b>X</b>	
• Heat problems		<b>X</b>	
• Interference due to O & G		<b>X</b>	
• Toxic fumes		<b>X</b>	
• Illicit dumping of hauled wastes		<b>X</b>	
• Worker health and safety concerns		<b>X</b>	
• Other (specify)			

a. If yes, describe the control authority's response:

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

If yes, explain.

Yes	No
	<b>X</b>

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

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

Yes	No
<b>X</b>	

\* Have not had to use one yet.

**G. ENFORCEMENT (Continued)**

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

a. Date of last modification: **None since inception of program**

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, Violation letters sent to IUs typically resulted in return to compliance.**

**H. DATA MANAGEMENT/PUBLIC PARTICIPATION**

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

**\* In accordance with outline in pretreatment program.**

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

**\* Review is available of files stored at the WWTP during business hours.**

3. a. Describe your data management system regarding pretreatment implementation and enforcement activities.  
(e.g., computerization, file system, etc.)

**\* POTW monitoring data and inspection forms are electronically stored and hard copies are filed.**

**\* IU correspondence including self-monitoring is stored as hard copies.**

b. How long are records maintained? [403.12(o)] **Minimum of 5 years**

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

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

\* IUs are informed of changes to SUO and pretreatment local limit changes when they are approved.

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

None

I. RESOURCES [403.8(d)(3)]

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.)

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?)

Discuss on pollutant-by-pollutant basis.

None

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
	<b>X</b>

If yes, what was found?

3. a. Have you implement any kind of public education program?

Yes	No
	<b>X</b>

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

	<b>X</b>
--	----------

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)?

\* Waste minimization at IUs and households.

\* Household hazardous waste management and disposal programs.



**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
	<b>X</b>

Explain.

**K. ADDITIONAL EVALUATIONS/INFORMATION**

SECTION II COMPLETED BY: Naajy Abdullah  
TITLE: Environmental Specialist

DATE: 11/16/2012  
TELEPHONE: (419) 373-3017

### SECTION III: EVALUATION AND SUMMARY

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

Description	Recommended Action	Required Action
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>		
• Status of program modifications (Ref. 403.18 /Checklist II.A.1)	None	None
<b>B. LEGAL AUTHORITY</b>		
• Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)	None	None
• Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)	None	None

C. IU CHARACTERIZATION

<ul style="list-style-type: none"> <li>Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)</li> </ul>	None	None
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D. CONTROL MECHANISM

<ul style="list-style-type: none"> <li>Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1)</li> </ul>	None	None
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<p>Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)</p>	None	None
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<p>Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/Checklist II.D.3&amp;4)</p>	None	None
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Description	Recommended Action	Required Action
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> <li>Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&amp;(iii); 403.5 /Checklist I.A)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&amp;3)</li> </ul>	None	None
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> <li>Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&amp;(v)/Checklist I.B.1&amp;2, II.F.1)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Adequate inspections (Ref. 403.8(f)(2)(v)&amp;(vi)/Checklist I.B.1; II.F.1)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&amp;4)</li> </ul>	None	None

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Notification of changed and hazardous waste discharges (Ref. 403.12(j)&amp;(p)/ Checklist I.C.1.b; II.G.1.b)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Evaluate the need for SIUs to develop slug discharge control plans (Ref. 403.8(f)(2)(v)/Checklist I.B.2.d; II.F.8)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&amp;(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b)</li> </ul>	None	None

Description	Recommended Action	Required Action
<b>G. ENFORCEMENT</b>		
<ul style="list-style-type: none"> <li>Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1)</li> </ul>	None	None
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	None	None
<ul style="list-style-type: none"> <li>Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&amp;5;II.G.2.c&amp;d, 5&amp;6)</li> </ul>	None	None

Description	Recommended Action	Required Action
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> <li>Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H)</li> </ul>	None	None
I. RESOURCES		
<ul style="list-style-type: none"> <li>Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)</li> </ul>	None	None
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> <li>Understanding of pollutants from all sources (Checklist II.J.1&amp;2)</li> </ul>	None	None

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Documentation of environmental improvements/effectiveness (Checklist II.J.1)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Integration of pollution prevention (Checklist II.J.3,4&amp;5)</li> </ul>	None	None

K: ADDITIONAL EVALUATIONS/INFORMATION

Empty space for additional evaluations/information.

SECTION III COMPLETED BY:	Naajy Abdullah	DATE:	11/16/2012
TITLE:	Environmental Specialist	TELEPHONE:	(419) 373-3017

## WENDB AND RNC WORKSHEET

<b>FACILITY INFORMATION</b>				
Name <b>Lucas County Maumee River WWTP</b>	Date of Inspection <b>11/16/2012</b>			
OH Number <b>2PK00000</b>	NPDES Number <b>OH0034223</b>			
<b>I. WENDB DATA ENTRY WORKSHEET</b>				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS
		PCI	AUDIT	Code
Number of SIUs	<b>8</b>	Annual	Annual	SIUS
Number of CIUs	<b>6</b>	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	<b>0</b>	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	<b>0</b>	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	<b>0</b>		II.F.1	PSNC
Number of SIUs in SNC with self-monitoring	<b>0</b>		II.F.1	MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	<b>0</b>	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	<b>1986</b>			
Technical Evaluation of Local Limits (Y/N) (Audit)	<b>Y</b>			
Adoption of technically-based limits (Y/N) (Audit)	<b>Y</b>			

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