



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

January 29, 2013

Re: Pretreatment  
City of New Philadelphia  
Pretreatment Compliance Inspection

Mayor and Council  
City of New Philadelphia  
166 East High Avenue  
New Philadelphia, Ohio 44663

Dear Mayor and Council:

On January 11, 2013, I conducted a pretreatment compliance inspection of the City of New Philadelphia's pretreatment program. Jim Hootman, Laboratory and Pretreatment Coordinator, and Aaron Hixenbaugh, Superintendent, represented the City during the inspection. The inspection was conducted to evaluate the City's compliance with State and Federal pretreatment regulations. Required actions and comments generated from the inspection are listed below.

**Required Actions:**

1. The City was required to modify elements of its pretreatment program as a result of the streamlining rule changes in Part 1.C. Paragraph C of the City's NPDES permit. New Philadelphia submitted the draft revisions to its pretreatment program to Ohio EPA, Southeast District Office, for review on April 17, 2012. Ohio EPA commented on the draft revisions on May 22, 2012. Ohio EPA will provide additional comments to the City in the near future. After the City receives Ohio EPA's comments, the City should make revisions as necessary and submit a pretreatment program modification request to Ohio EPA's Central Office at its earliest convenience. Procedures for program modification requests are specified in OAC 3745-3-03(E) and Ohio EPA's Pretreatment Program, Modification Guidance.
2. Several monitoring reports submitted by Graphic Packaging and the New Philadelphia Times Recorder did not include the signature of a responsible official. The certification statement found in 403.6(a)(2)(ii) is required for categorical industrial users. Gradall Industries' reports did not include the certification. New Philadelphia must ensure that industrial user monitoring reports meet the signatory requirements of 40 CFR 403.12(l) and Paragraph V of its industrial user discharge permit, and records retention requirements of 40 CFR 403.12(o) and Paragraph M of the industrial user discharge permit, and the certification requirements of 40 CFR 403.12(l). If the City wishes to allow

electronic submission of monitoring reports to expedite submittal, the City should require industrial users to also forward hard copy reports that are properly signed and certified at a later date. I suggest that the City include instructions for the signatory requirements and the certification statement on the reporting forms to help the industries avoid problems with improperly signed reports. The City should require the industrial users to maintain signed copies of the reports in their files to ensure the signatory and record keeping requirements are met. Please notify Ohio EPA how the City will comply with this requirement.

**Comments:**

New Philadelphia reported exceedances of its monthly average mercury limit in May and November of 2012. Influent mercury concentrations were higher than expected during the months of September, November and December of 2012. The City conducted additional mercury monitoring at its industrial users which showed none were a significant source of mercury. It is recommended that the City collect low level mercury samples at strategic locations in the collection system to try to identify and isolate significant mercury sources. The dramatic variations in influent mercury suggest a relatively small number of significant sources.

Dental facilities are a common source of elevated mercury. The City may wish to develop an inventory of dental service providers, determine whether they have amalgam separators, and that the separators are being properly maintained. If the mercury violations cannot be eliminated, Ohio EPA may require the City to apply for a mercury variance when the NPDES permit is renewed. Information on preparation of a mercury variance is available at:

[http://www.epa.ohio.gov/dsw/permits/technical\\_assistance.aspx#Mercury](http://www.epa.ohio.gov/dsw/permits/technical_assistance.aspx#Mercury). Best Management Practices for Amalgam Wastes, a document published by the American Dental Association, are also available at the web site. The document includes several references on amalgam separator design and performance which dental facilities may wish to access.

Please respond to this letter in writing within 30 days. Should you have any questions or comments, please contact me at (740) 380-5423.

Sincerely,



Fred J. Snell  
District Representative  
Division of Surface Water

FJS/dh

Enclosure

c: Jim Hootman, Lab. & Pretreatment Coord., City of New Philadelphia WWTP  
c: Pretreatment Unit, DSW, CO

# WENDB AND RNC WORKSHEET

## PCI/Audit/RI Checklist

<b>FACILITY INFORMATION</b>				
Name City of New Philadelphia	Date of Inspection January 11, 2013			
OH Number OH0026727	NPDES Number 0PD00012*PD			
<b>I. WENDB DATA ENTRY WORKSHEET</b>				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	3	Annual	Annual	SIUS
Number of CIUs	1	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	0	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	0			PSNC
Number of SIUs in SNC with self-monitoring	0			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	9/19/85			
Technical Evaluation of Local Limits (Y/N) (Audit)	Y			
Adoption of technically-based limits (Y/N) (Audit)	Y			

<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"/>			