



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

April 3, 2013

Greene County
Board of Commissioners
35 Greene Street
Xenia, Ohio 45385

**RE: Greene County – Audit 2013, Notice of Violation
Notice of Significant Non-Compliance**

Ladies and Gentlemen:

On March 11 and 12, 2013, I conducted a Pretreatment Audit Inspection (PAI) of the Greene County approved pretreatment program. The County was represented by Mr. Jim Fox and Mr. Jim Martin. The PAI followed a checklist designed by Ohio EPA to evaluate all aspects of the County's pretreatment program. A discussion of the Findings and Required Actions is given below. This letter also serves as a Notice of Violation for failure to fully implement the approved pretreatment program. Due to the violations discovered during the inspection, it has been determined that the Beaver Creek WWTP (1PK00003*LD) and the Sugar Creek WWTP (1PK00014*ND) are in Significant Non-Compliance.

Finding / Violation (SNC):

- NPDES Permits 1PK00003*LD and 1PK00014*ND require that a Priority Pollutant Scan be performed annually and the data is to be submitted on EPA Form 4221 as part of the Annual Pretreatment Report. The County has repeatedly violated this requirement. In 2010, the County failed to perform the Priority Pollutant Scan. In 2011, the Priority Pollutant Scan was completed but the information was not submitted. The analytical data was obtained at the 2012 Pretreatment Compliance Inspection. In 2012, the Priority Pollutant Scan was performed but not submitted. The County submitted the completed EPA Form 4221 via email after being contacted by Ohio EPA regarding the failure to include it with the Annual Pretreatment Report. These violations are categorized as Level I violations of the approved pretreatment program.

Required Action:

- **The County shall perform the Priority Pollutant Scan no later than October 1, 2013. The data shall be submitted on EPA Form 4221 with the Annual Pretreatment Report as required in NPDES Permit 1PK00003*LD and 1PK00014*ND.**

Finding / Violation (SNC):

- The County is required to sample the Significant Industrial Users twice per year. The County only performed one sampling event in calendar year 2012 for each of the Significant Industrial Users. Failure to complete the sampling as required is a violation of the approved pretreatment program requirements. This violation is categorized as a Level II violation of the approved pretreatment program.

Required Action:

- **The County shall perform all required sampling events of the Significant Industrial Users no later than October 1, 2013.**

Finding / Violation (SNC):

- The Approved Pretreatment Program requires that all Significant Industrial Users be inspected once per year. This violation is categorized as a Level II violation of the Approved Pretreatment Program. (No inspections completed for calendar year 2012.)

Required Action:

- **The County shall complete the above-referenced inspections no later than October 1, 2013.**

Finding:

- It was discovered during the inspection that the industrial user permits which contain Total Toxic Organic sampling requirements incorrectly identify the sample type as only a composite sample.

Required Action:

- **The County must modify the above-referenced permits to indicate that the sample type required for Total Toxic Organic monitoring is both a composite and a grab sample type.**

Finding:

- During a review of the industrial user files, it was discovered that on 8/15/12, Unison Industries submitted sample data but did not include said data on the required report form. The significance of this finding is that the report form contains a certification statement regarding the monitoring data being true

and accurate. The validity of the sampling data can come into question if it is not included on the required report form.

Required Action:

- **The County must ensure that all sampling data is submitted on the required form and that said form contains the required certification statement.**

Finding:

- During the inspection, it was stated by the County representatives that due to inadequate staffing levels, the inspections and sampling of the Significant Industrial Users were not performed as required.

Required Action:

- **The County shall determine the number of full time equivalent staff it will require to fully implement the approved pretreatment program. Upon completion of this determination, the County will need to allocate adequate staff resources to ensure that the program is being fully implemented.**

Recommended Action:

- **If it becomes apparent that the number of staff required to implement the approved pretreatment program will not be available, the County should consider subcontracting certain tasks. Tasks such as sampling of the Significant Industrial Users could be subcontracted to a third party.**

Finding:

- Dayton Wheel Concepts submitted a Toxic Organic Management Plan (TOMP) on April 1, 1998. Staff members responsible for the implementation of the pretreatment program are unfamiliar with the plan contents and the plan has not been revised since the original submittal.

Recommended Action:

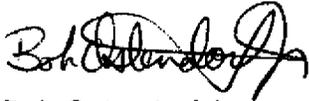
- **It is recommended that the County require Categorical Industrial Users to submit a current Toxic Organic Management Plan as part of the permit renewal process. The County should also familiarize themselves with the plans prior to performing an inspection of the facility. See Section III: Evaluation and Summary for additional details.**

Greene County – 2013 Pretreatment Audit Inspection Findings
Notice of Violation, Notice of Significant Non-Compliance
April 3, 2013
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Please provide this office, in writing, within ten days of receipt of this notification, a description of the actions taken or proposed to address the "Findings" and "Required Actions" listed above. Your response should include the dates, either actual or proposed, for completion of said actions. Please be advised that failure to complete the "Required Actions" within the specified timeframe may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

The assistance of your staff during the inspection is greatly appreciated. If you have any questions regarding this report, please feel free to contact me at (937) 285-6107 or via email at: Robert.Ostendorf@epa.ohio.gov.

Sincerely,



Bob Ostendorf Jr.
Environmental Specialist II
Division of Surface Water

RO/tb

Enclosures



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PK00014*ND	OH0040592	03/11-12, 2013	A	S	1

Section B: Facility Data	
Name and Location of Facility Inspected Greene County Sugarcreek WWTP 2365 State Route 725 Spring Valley, OH 45370	Entry Time
	Exit Time
Name(s) and Title(s) of On-Site Representatives Mr. Jim Fox, Deputy Director Mr. Jim Martin, Laboratory Manager	Phone Number(s) 937-562-7450 937-562-7150
Responsible Official(s) Greene County Board of Commissioners 35 Greene Street Xenia, OH 45385	Coordinator's Mailing Address Greene County Sanitary Engineering Department 667 Dayton-Xenia Road Xenia, OH 45385

Section C: Areas Evaluated During Inspection	
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)	
U	Pretreatment

Section D: Summary of Findings (Attach additional sheets if necessary)
See Attached Report.

Inspector	Reviewer
 Bob Ostendorf Jr. Environmental Specialist II Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4-3-13 Date	4/03/13 Date



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PK00003*LD	OH0025381	03/11-12, 2013	A	S	1

Section B: Facility Data	
Name and Location of Facility Inspected Greene County Beavercreek WWTP 420 Factory Road Beavercreek, OH 45434	Entry Time
	Exit Time
Name(s) and Title(s) of On-Site Representatives Mr. Jim Fox, Deputy Director Mr. Jim Martin, Laboratory Manager	Phone Number(s) 937-562-7450 937-562-7150
Responsible Official(s) Greene County Board of Commissioners 35 Greene Street Xenia, OH 45385	Coordinator's Mailing Address Greene County Sanitary Engineering Department 667 Dayton-Xenia Road Xenia, OH 45385

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Inspector	Reviewer
 Bob Ostendorf Jr. Environmental Specialist II Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4-3-13 Date	4/3/13 Date

PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Cover Page and Acronym List	
Section I	IU File Evaluation
Section II	Interview
Section III	Evaluation and Summary
<input checked="" type="checkbox"/> Attachment A	Pretreatment Program Status Update
<input checked="" type="checkbox"/> Attachment B	Pretreatment Program Profile
Attachment C	Worksheets
	<input checked="" type="checkbox"/> WENDB/ RNC Worksheet (Required)
	<input checked="" type="checkbox"/> IU Site Visit Report Form (Optional)
	<input checked="" type="checkbox"/> File Review Worksheets (Optional)
Attachment D	Supporting Documentation

Control Authority (CA) name and address	Date(s) of Audit
<i>Board of Commissioners Greene County 35 Greene Street Xenia, Ohio 45385</i>	<i>March 11-12, 2013</i>

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
<i>Bob Ostendorf Jr.</i>	<i>Environmental Specialist 2/Ohio EPA Southwest District</i>	<i>937.285.6107</i>

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
<i>Jim Fox</i>	<i>Deputy Director/Greene Co. Sanitary Engineering Dept.</i>	<i>937.562.7450</i>
<i>Jim Martin</i>	<i>Manager/Greene Co. Sanitary Engineering Dept.</i>	<i>937.562.7150</i>

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
Unison Industries
3455 Dayton-Xenia Road
Beavercreek, Ohio 45434

Type of industry
Manufacture tube fittings.

IU CLASSIFICATION BY CA:
 CIU 40 CFR 433, _____
 Category(ies) New Source
 Non-categorical SIU Non SIU

Average total flow (gpd) _____ Average process flow (gpd) **36,985**
 Industry visited during audit? Yes No

COMPLIANCE STATUS

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

Explanation:

Comments

Beavercreek WWTP

FILE 2 Industry name and address
Dayton Wheel Concepts
115 Compark Road
Dayton, Ohio 45459

Type of industry
Manufacture and repair wire wheels for cars and motorcycles.

CIU 40 CFR 433, _____
 Category(ies) New Source
 Non-categorical SIU Non SIU

Average total flow (gpd) _____ Average process flow (gpd) **3,110**
 Industry visited during audit? Yes No

COMPLIANCE STATUS

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

EXPLANATION:

Comments

Sugarcreek WWTP

SECTION I: IU IDENTIFICATION (Continued)

FILE ____ Industry name and address	Type of industry
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IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU 40 CFR ____, ____, Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during audit? Yes <input type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS

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

EXPLANATION:

Comments

FILE ____ Industry name and address	Type of industry
-------------------------------------	------------------

IU CLASSIFICATION BY CA: <input type="checkbox"/> CIU 40 CFR ____, ____, Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during audit? Yes <input type="checkbox"/> No <input type="checkbox"/>	

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) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during audit? Yes <input type="checkbox"/> No <input type="checkbox"/>	
COMPLIANCE STATUS <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) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during audit? Yes <input type="checkbox"/> No <input type="checkbox"/>	
COMPLIANCE STATUS <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance EXPLANATION:		
Comments:		

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	File	File		
					SECTION I: IU FILE REVIEW	
					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)(i)
Y	Y				a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(A)
Y	Y				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)
					• Application of applicable categorical standards	403.8(f)(1)(v)
Y	Y				- Classification by category/subcategory	
Y	Y				- Classification as new/existing source	
Y	Y				- Application of limits for all categorical pollutants	
N	YI				- Application of TIO or TOMP alternative	
NA	NA				- Calculation and application of production-based standards	403.6
Y	NA				- Calculation and application of CWF or FWA	403.6(d)&(e)
Y	Y				• Application of applicable local limits	
Y	Y				• Application of most stringent limit	403.8(f)(1)(v)
Comments						
<p>1- The county has a TOMP on file for Dayton Wheel Concepts dated April 1, 1998. The county does not require the facility to review the TOMP periodically to ensure the TOMP continues to be accurate and representative of the facilities operations.</p>						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	
					d. IU self-monitoring requirements	403.8(f)(1)(iii)(D)
Y	Y				• Identification of pollutants to be monitored	
Y	Y				• Sampling frequency	
Y	Y				• Sampling locations/discharge points defined	
Y	Y				• Reporting requirements	
NI	NI				• Appropriate sample types (grab or composite)	
Y	Y				• Record keeping requirements	403.12(o)
Y	Y				e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
NA	NA				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	403.8(f)(1)(iii)(D)
NA	NA				k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)

Comments

1 - It was discovered during the audit that the CA control mechanism (permit) indicated that the TTO sample was to be a composite sample. The IU's were collecting the sample as required in the permit issued to them by the CA but unfortunately the sample type in the permit was incorrect.

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					B. CA COMPLIANCE MONITORING	
					1. Inspection	
NI	NI				a. Inspection at frequency specified in approved program	403.8
NA	NA				b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
Y2	Y2				c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(d)(2)(v)
					2. Sampling	
N3	N3				a. Sampling at frequency specified in approved program	403.8
N4	N4				b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
Y	Y				c. Analysis for all regulated parameters	403.12(g)(1)
N4	N4				d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
<p>Comments</p> <p>1 - The facility was not inspected during the previous 12 month period.</p> <p>2 - Document solvent management plan, spills, releases, chemical storage areas.</p> <p>3 - There was only one categorical sampling event.</p> <p>4 - The CA does not have written Standard Operating Procedures in place for analysis performed in the field nor in the laboratory. It is recognized that the CA is in the process of developing the required written Standard Operating Procedures. It was also discovered during the audit that the original chain of custody forms are not kept on file. The information on the original Chain of Custody is copied onto a new Chain of Custody form which is then placed into the file. The CA was instructed to discontinue this practice and to keep the original Chain of Custody on file.</p>						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES						
					1. Identification of and response to violations	403.80(2)(v)
					a. Discharge violations	
NA	NA				• IU self-monitoring	
NA	NA				• CA compliance monitoring	
					b. Monitoring/reporting violations	
					• IU self-monitoring	
NI	NA				-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
NA	NA				-Sampling (e.g., frequency, pollutants)	
NA	NA				-TTO requirements met	
					• Notification	
NA	NA				-Notified CA of significant change in operation or discharge	403.12(j)
NA	NA				-Immediate notification of slug load discharge or accidental spill	OAC 3745-3-05
NA	NA				-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
NA	NA				-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
NA	NA				• Submission/implementation of slug discharge control plan	403.80(2)(v)
NA	NA				• Met compliance schedule milestones by required dates	403.12
					c. Compliance schedule violations	
NA	NA				• Start-up/final compliance	
NA	NA				• Interim dates	
Comments <i>I – The report received by the CA on 8/15/12 included sampling data which was attached to the report but not included within the report so therefore the signatory requirement was not satisfied for the attached data. The CA had not identified this matter as being an issue until it was brought to their attention during this audit and therefore no enforcement action was found during the file review.</i>						

File 1	File 2	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
C. CA ENFORCEMENT ACTIVITIES (Continued)						
NA	NA				2. Proper calculation of SNC	403.8(f)(2)(vii)
NA	NA				a. Chronic	
NA	NA				b. IRC	
NA	NA				c. Pass through/interference	
NA	NA				d. Spill/slugs load	
NA	NA				e. Reporting	
NA	NA				f. Compliance schedule	
NA	NA				g. Other violations (specify)	
NA	NA				3. Adherence to approved ERP	
NA	NA				a. Proper response to violation	403.8(f)(5)
NA	NA				b. Escalation of enforcement	403.8(f)(5)
NA	NA				4. Return to compliance	
NA	NA				a. Within 90 days	
NA	NA				b. Within time specified	
NA	NA				c. Through compliance schedule	
NA	NA				5. Publication for SNC	403.8(f)(2)(vii)
D. OTHER						
Comments						

SECTION I COMPLETED BY: Bob Ostendorf Jr.	DATE: March 11, 2013
TITLE: Environmental Specialist 2	TELEPHONE: 937.285.6107

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.)

None.

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

If yes, describe.

None

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.

The County has multi-jurisdictional agreements. These were updated around 2000.

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 [403.8(f)(2)(D)&(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)

Through Billing. Plan Review will also send over plans if it appears to be industrial.

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

Sampling. Inspections. The industries are required to notify of changes in their permits.

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
0	0%

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]

0

If any, explain.

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

Yes	No
	X

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

Discuss:

NA

D. CONTROL MECHANISM EVALUATION (Continued)

Yes	No
	X
	X

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)]

The County will accept septage that their staff has pumped from their customers. The County will also accept RV tanks for its customers.

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)]

NA. The County does not accept hauled industrial waste.

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)]

OWEA. OTCO. Ohio EPA will send out information. Seminars.

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

Yes	No
	X

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?

The Combined Wastestream Formula was applied to the Unison permit. The county worked with the Ohio EPA and the facility during the implementation of this permit modification.

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 1/1/2012 to 12/31/2012.)

a. Not sampled or not inspected at least once [WENDB-NOIN]	0	0%
b. Not sampled at least once (all parameters)?	0	0%
c. Not inspected at least once?	2	100%
d. In SNC with self monitoring and not inspected or sampled?	0	0%

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

The county did not perform inspections of their 2 SIUs during the timeframe indicated.

2. Who performs your compliance sampling and analysis?

	Sampling	Analysis
• Metals	County	County
• Cyanide	County	Test America
• Organics <i>TTOs</i>	County	Belmont Labs
• Conventionals	County	County
• Other (specify) <i>As, Se, Mo</i>	County	Test America

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)]

A sampling/equipment blank is run each year. This turns out to be >10% of sampling events. Laboratory methods include duplicates/spikes on at least a 10% basis. Some methods, such as cBOD and SS do not include spikes. All methods are referenced in 40 CFR 136. Contract labs report using methods referenced in 40 CFR 136. The county has begun to develop the written Standard Operating Procedures for the analysis performed within the lab and in the field. The county has the practice of not keeping the original Chain of Custody form on file. The county was advised to keep the original Chain of Custody on file and to evaluate their documentation of sample custody within their laboratory.

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

There is some concern related to the collection of grab samples at the SIU sampling locations. Various sampling methods for the collections of grab samples were discussed during the audit. The county was advised that the use of the automatic sample was not an approved method for the collection of grab samples.

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

Annually as part of the inspection.

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

All

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	<i>Rain-related.</i>
• Excessive pollutant concentrations		X	
• Heat problems		X	
• Interference due to O & G		X	
• Toxic fumes		X	
• Illicit dumping of hauled wastes		X	
• Worker health and safety concerns		X	
• Other (specify)		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.

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

G. ENFORCEMENT (Continued)

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

a. Date of last modification:

1991

b. Problems with implementation:

No.

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

The County hasn't had to use the ERP. The SIUs have stayed in compliance.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

Haven't had any. There are provisions in the regulations.

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

Haven't had any. Would allow to come in and review.

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

A hybrid of hard copies and computer copies. Have some spreadsheets that are used, but the County only has two SIUs.

b. How long are records maintained? [403.12(o)]

A minimum of three 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)]

When changes are adopted by the Commissioners, it is on the agenda. Available on-line. Ohio EPA public notices its actions.

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

None.

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].

Parts of 4 FTEs

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.)

It was discussed during the audit that the required sampling and inspection of the significant industrial users had not taken place due to the laboratory being short staffed. The laboratory is now fully staffed.

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.

Yes. The County is in compliance with its NPDES permit. Metal levels are low.

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)?

If yes, what was found?

Developed local limits.

Yes	No
X	

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?

Explain.

Yes	No
	X
	X

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

None.

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

SECTION II COMPLETED BY:	<i>Bob Ostendorf Jr.</i>	DATE:	<i>March 11, 2013</i>
TITLE:	<i>Environmental Specialist 2</i>	TELEPHONE:	<i>937.285.6107</i>
SECTION II COMPLETED BY:	<i>Jim Fox</i>	DATE:	<i>March 11, 2013</i>
TITLE:	<i>Deputy Director</i>	TELEPHONE:	<i>937.562.7450</i>

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
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> • Status of program modifications (Ref. 403.18 /Checklist II.A.1) 		
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> • Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2) 		
<ul style="list-style-type: none"> • Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1) 		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> • Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2) 		
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> • Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1) 		
<ul style="list-style-type: none"> • Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4) 	X	
<p><i>RECOMMENDED ACTION:</i> <i>The county has a TOMP on file for Dayton Wheel Concepts. The TOMP is dated 4/1/1998 and has never been revised. It is recommended that the county require Dayton Wheel Concepts to review the accuracy of the TOMP at least once per permit cycle.</i></p>		
<ul style="list-style-type: none"> • Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/Checklist II.D.3&4) 		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&(iii); 403.5 /Checklist I.A) 		X
<p><u>REQUIRED ACTION:</u> <i>The County must modify the SIU permits to reflect that the portion of the TTO sample used for analysis of the volatile pollutants (USEPA Method 624) is required to be a grab sample.</i></p>		
<ul style="list-style-type: none"> Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3) 		
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1) 		X
<p><u>REQUIRED ACTION:</u> <i>The County must sample its categorical industries a minimum of twice a year. The county only performed one sampling event at each of its significant industrial users.</i></p>		
<ul style="list-style-type: none"> Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) 		X
<p><u>REQUIRED ACTION:</u> <i>The County failed to perform any inspections during the previous calendar year. The county is required to inspect its significant industrial users at least once per year.</i></p>		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4) 		
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) 		X
<p><i>REQUIRED ACTION:</i> The County must ensure that all monitoring is included on the report form and the report signature requirement has been satisfied. The report received from Unison on 8/15/12 included monitoring data(attached) that was not on the report form. The certification statement therefore did not apply to the attached monitoring data.</p>		
<ul style="list-style-type: none"> Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b) 		
<ul style="list-style-type: none"> 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) 		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b) 		
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1) 		
<ul style="list-style-type: none"> Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2) 		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) 		
<ul style="list-style-type: none"> Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&5;II.G.2.c&d, 5&6) 		
<p>H. DATA MANAGEMENT/PUBLIC PARTICIPATION</p>		
<ul style="list-style-type: none"> Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H) 		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources (Ref. 403.8(f)(3)/Checklist II.I) 	X	X
<p>REQUIRED ACTION: <i>It was determined during the audit that laboratory staff performs the sampling and inspections of the Significant Industrial Users. Due to inadequate staffing levels of laboratory personnel, the required sampling and inspection of the Significant Industrial Users was not completed. The county shall determine staffing requirements (Full Time Equivalent) to implement the approved Pretreatment Program.</i></p> <p>RECOMMENDED ACTION: <i>The required monitoring that the county is required to perform can be contracted out to a third party. The county should consider subcontracting monitoring (sampling and analysis) of its Significant Industrial Users if adequate resources are not available in the future.</i></p>		
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources (Checklist II.J.1&2) 		
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness (Checklist II.J.1) 		

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Integration of pollution prevention (Checklist II.J.3,4&5) 		

K. ADDITIONAL EVALUATIONS/INFORMATION

Priority Pollutant Scan

*The county has repeatedly failed to comply with the Priority Pollutant Scan requirements found in Part II, Item (W)(7) of NPDES permit 1PK00003*LD (Beavercreek WWTP) and NPDES permit 1PK000014*LD (Sugar creek WWTP). The following information summarizes these violations:*

2010 – Priority Pollutant Scanned not performed.

2011 – Priority Pollutant Scan completed but not submitted with Annual Report. Analytical data provided during 2011 Pretreatment Compliance Inspection.

2012 – Priority Pollutant Scan completed but not submitted with Annual Report. Priority Pollutant Scan results submitted via email only after being contacted by the Ohio EPA.

Required Action: *The facility shall complete the required priority pollutant scan by no later than October 1, 2013 and shall submit the information on Form 4221 with the Annual report as required in NPDES permits 1PK00003*LD and 1PK00014*ND.*

SECTION III COMPLETED BY:	<i>Bob Ostendorf Jr.</i>	DATE:	<i>March 28, 2013</i>
TITLE:	<i>Environmental Specialist 2</i>	TELEPHONE:	<i>937.285.6107</i>

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE

**Pretreatment Pre-Inspection Checklist
PCI/Audit/RI**

POTW: *Greene County Beavercreek WWTP
Greene County Sugarcreek WWTP*

Date of Inspection: *March 11, 2013*

Type of Inspection: *PCI / Audit / RI*

Inspector: *Bob Ostendorf Jr.*

This checklist must be completed prior to conducting a PCI, audit, or RI. This checklist is designed to coordinate information from a number of sources to provide background information and to help develop an overview of the pretreatment program. Summarize items that should be verified during inspection. If items are get too numerous or get too lengthy to summarize, copy appropriate pages and attach.

Program Deficiencies

Pretreatment related Consent Decree and/or Administrative Orders that were completed or are pending since the last inspection.	<i>None.</i>
NPDES permit compliance schedule items that have been completed or are pending.	<i>None.</i>
Since the last inspection, has the CA been in RNC or SNC? Why?	<i>No.</i>
Findings of the last PCI/Audit/RI. Highlight any unresolved issues or corrective actions taken by the CA.	<i>None.</i>

Control Authority Submittals and Reports

Have there been any program modifications since the last inspection? If yes, what is the status?	<i>No.</i>
Was the Annual Report submitted on time? Is it complete?	<i>No. The priority pollutant scans were not included.</i>
Comments/follow-up questions on the Annual Report	<i>Received priority pollutant scans after they were requested. Problems getting data onto the new electronic forms.</i>
Were the Quarterly Reports submitted on time? Are they complete?	<i>Yes.</i>
Comments/follow-up questions on the Quarterly Industrial User Violation Reports	<i>None.</i>
Identify industries to target for file reviews/inspections, based on the Annual and Quarterly Reports	<i>Review all since there are only two SIUs. ATK was delisted. GE Aviation Dayton - Elano is still in the process of installing categorical operations.</i>

MOR Data Review

Effluent violations to discuss.	<i>None.</i>
Sludge quality issues to discuss.	<i>None.</i>

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 <i>Beavercreek Water Resource Reclamation Facility</i>			2. Location address <i>420 Factory Road, Beavercreek, Ohio 45434</i>																															
3. a. NPDES permit number <i>OH0025381;1PK00003*LD</i>	b. Expiration date <i>July 31, 2013</i>	4. Treatment plant wastewater flows																																
		Design 8.5	MGD	Actual 8.175																														
		MGD	MGD	MGD																														
5. Sewer System	a. Separate <i>100%</i>	b. Combined <i>0%</i>	c. Number of CSOs 0																															
6. a. Industrial contribution (MGD)		b. Number of SIUs discharging to plant		c. Percent industrial flow to plant																														
<i>~0.011</i>		<i>1</i>		<i>0.1%</i>																														
7. Level of treatment		Type of Process(es)																																
a. Primary	<input checked="" type="checkbox"/>	<i>Bar Screen, Grit Removal, Primary Settling</i>																																
b. Secondary	<input checked="" type="checkbox"/>	<i>Activated Sludge, Biological Nutrient Removal, Final Clarification, UV Disinfection</i>																																
c. Tertiary																																		
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.																																		
<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 20%;"></th> <th style="width: 15%;">Influent (Times/Year)</th> <th style="width: 15%;">Effluent (Times/Year)</th> <th style="width: 15%;">Sludge (Times/Year)</th> <th style="width: 35%;">Receiving Stream (Times/Year)</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">a. Metals</td> <td><i>12</i></td> <td><i>12</i></td> <td><i>12</i></td> <td><i>4</i></td> </tr> <tr> <td style="text-align: left;">b. Organics</td> <td><i>1</i></td> <td><i>1</i></td> <td><i>1</i></td> <td><i>0</i></td> </tr> <tr> <td style="text-align: left;">c. Toxicity testing</td> <td><i>NA</i></td> <td><i>NA</i></td> <td><i>NA</i></td> <td><i>NA</i></td> </tr> <tr> <td style="text-align: left;">d. EP toxicity</td> <td><i>NA</i></td> <td><i>NA</i></td> <td><i>NA</i></td> <td><i>NA</i></td> </tr> <tr> <td style="text-align: left;">e. TCLP</td> <td><i>NA</i></td> <td><i>NA</i></td> <td><i>NA</i></td> <td><i>NA</i></td> </tr> </tbody> </table>						Influent (Times/Year)	Effluent (Times/Year)	Sludge (Times/Year)	Receiving Stream (Times/Year)	a. Metals	<i>12</i>	<i>12</i>	<i>12</i>	<i>4</i>	b. Organics	<i>1</i>	<i>1</i>	<i>1</i>	<i>0</i>	c. Toxicity testing	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>	d. EP toxicity	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>	e. TCLP	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>
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e. TCLP	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>																														
9. Effluent Discharge																																		
a. Receiving water name <i>Beaver Creek</i>		b. Receiving water classification <i>Exceptional Warmwater</i>		c. Receiving water use <i>Primary Contact; Agricultural & Industrial Water Supply</i>																														
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	No
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. <i>Beavercreek WWTP</i>			
a. Land application		dry tons/year	e. Public distribution
b. Incineration		dry tons/year	f. Lagoon storage
c. Monofill		dry tons/year	g. Other (specify)
d. MSW landfill	870.45	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).			
<i>Regulations & Specifications established by Resolution No. 93-6-24-14 under the authority of ORC 343 & 6117</i>			
b. Date enacted/adopted	<i>June 24, 1993</i>	c. Date of most recent revisions	<i>May 9, 2006</i>
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)]	X		
b. Require compliance with standards [403.8(f)(1)(ii)]	X		
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]	X		
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]	X		
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]	X		
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]	X		
g. Comply with confidentiality requirements [403.8(f)(1)(vii)]	X		
3. a. How many contributing jurisdictions are there?	2		
List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.			
Jurisdiction Name	Number of CIUs	Number of Other SIUs	
<i>City of Beavercreek</i>	0	1	
<i>Greene County (unincorporated)</i>	0	0	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

D. LEGAL AUTHORITY (Continued)																			
<p>3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? <i>No contributing jurisdictions.</i></p> <p>If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).</p>		Yes	No																
<p>4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">a. IWS update</td> <td style="width: 10%;"></td> <td style="width: 30%; padding: 5px;">e. Notification of IUs</td> <td style="width: 30%;"></td> </tr> <tr> <td style="padding: 5px;">b. Permit issuance</td> <td></td> <td style="padding: 5px;">f. Receipt and review of IU reports</td> <td></td> </tr> <tr> <td style="padding: 5px;">c. Inspection and sampling</td> <td></td> <td style="padding: 5px;">g. Analysis of samples</td> <td></td> </tr> <tr> <td style="padding: 5px;">d. Enforcement</td> <td></td> <td style="padding: 5px;">h. Other (specify)</td> <td></td> </tr> </table>				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)	
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c. Inspection and sampling		g. Analysis of samples																	
d. Enforcement		h. Other (specify)																	
<p>E. IU CHARACTERIZATION</p>																			
<p>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(t)(2)(i)]</p> <p>b. Indicate which methods are to be used to update the IWS.</p> <ul style="list-style-type: none"> • Review of newspaper/phone book • Review of water billing records • Review of plumbing/building permits <p>c. How often is the IWS to be updated?</p>		Yes	No																
		X																	
			X																
			X																
<p>2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(t)(1)]</p> <p>If no, provide the CA's definition of "significant industrial user."</p>		Yes	No																
		X																	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

F. CONTROL MECHANISM			
1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).		<i>Permit</i>	
b. What is the maximum term of the control mechanism?		<i>3 years</i>	
2. Does the approved control mechanism include the following? [403.8(f)(1)(iii)]		Yes	No
a. Statement of duration		X	
b. Statement of non-transferability		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).			
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)

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

Partial Technical Evaluation (not all 10 pollutants evaluated)?

	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric) mg/L
	Yes	No	Yes	No	Yes	No	
	a. Arsenic (As)	X		X		X	
b. Cadmium (Cd)	X		X		X		1.0
c. Chromium (Cr)	X		X			X	-
d. Copper (Cu)	X		X		X		1.0
e. Cyanide (CN)	X		X		X		6.0
f. Lead (Pb)	X		X		X		3.0
g. Mercury (Hg)	X		X		X		0.03
h. Molybdenum (Mo)	X		X			X	-
i. Nickel (Ni)	X		X		X		6.0
j. Selenium (Se)	X		X		X		1.0
k. Silver (Ag)	X		X			X	-
l. Zinc (Zn)	X		X		X		1.0
m. Other (specify)							

H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

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

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

I. ENFORCEMENT										
1. Does the CA's program define "significant noncompliance"?	<input checked="" type="checkbox"/>	Yes	No							
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	<input checked="" type="checkbox"/>									
If no, provide the CA's definition of "significant noncompliance."										
2. Does the CA have an approved, written ERP? [403.8(f)(5)]		<input type="checkbox"/>	<input checked="" type="checkbox"/>							
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 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	\$1,000/day/violation							
e. Termination of service	<input checked="" type="checkbox"/>	• Criminal	Per ORC 6117.99							
		• Administrative	\$1,000/day/violation							
J. DATA MANAGEMENT/PUBLIC PARTICIPATION										
1. Does the approved program describe how the POTW will manage its files and data?	<input checked="" type="checkbox"/>	Yes	No							
<table style="width: 100%; border: none;"> <tr> <td style="width: 25%; border: none;">Are files/records</td> <td style="width: 15%; border: 1px solid black; height: 40px;"></td> <td style="width: 25%; border: none;">computerized?</td> <td style="width: 15%; border: 1px solid black; text-align: center;">X</td> <td style="width: 20%; border: none;">hard copy?</td> <td style="width: 20%; border: 1px solid black;"></td> <td style="width: 15%; border: none; text-align: right;">both?</td> </tr> </table>				Are files/records		computerized?	X	hard copy?		both?
Are files/records		computerized?	X	hard copy?		both?				
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"/>	Yes	No						

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components:

	FTEs
a. Legal assistance	0
b. Permitting	0.01
c. Inspections	0.01
d. Sample collection	0.02
e. Sample analysis	0.01
f. Data analysis, review, and response	0.01
g. Enforcement	0.01
h. Administration?	0.01
TOTAL	0.10

2. Identify the sources of funding for the pretreatment program. [403.8(f)(3)]

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

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY:	<i>Bob Ostendorf Jr.</i>	DATE:	<i>March 28, 2013</i>
TITLE:	<i>Environmental Specialist II</i>	TELEPHONE:	<i>937.285.6107</i>

WENDB AND RNC WORKSHEET

PCI/Audit/RI Checklist

FACILITY INFORMATION				
Name <i>Greene County Beavercreek WWTP</i>	Date of Inspection <i>March 11-12, 2012</i>			
OH Number <i>OH0025381</i>	NPDES Number <i>1PK00003*LD</i>			
I. WENDB DATA ENTRY WORKSHEET				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	<i>1</i>	Annual	Annual	SIUS
Number of CIUs	<i>1</i>	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	<i>0</i>	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	<i>1</i>	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	<i>0</i>			PSNC
Number of SIUs in SNC with self-monitoring	<i>0</i>			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	<i>0</i>	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	--			
Technical Evaluation of Local Limits (Y/N) (Audit)	--			
Adoption of technically-based limits (Y/N) (Audit)	--			

II. RNC/SNC WORKSHEET				
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC				
	RNC	Level	Reference	
			PCI	Audit
-	Failure to enforce against pass through and/or interference	I		
X	Failure to submit required reports within 30 days	I		
-	Failure to meet compliance schedule milestone date within 90 days	I		
-	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.2.b	II.D.1.b
X	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.1	II.F.1
-	Failure to enforce pretreatment standards and reporting requirements	II		I.C.1
-	Other (specify)	II		
SNC				
X	Control Authority in SNC for violation of any Level I criterion			
-	Control Authority in SNC for violation of two or more Level II criterion			

WENDB AND RNC WORKSHEET

PCI/Audit/RI Checklist

FACILITY INFORMATION				
Name <i>Greene County Sugarcreek WWTP</i>	Date of Inspection <i>March 15, 2012</i>			
OH Number <i>OH0040592</i>	NPDES Number <i>1PK00014*ND</i>			
I. WENDB DATA ENTRY WORKSHEET				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	<i>1</i>	Annual	Annual	SIUS
Number of CIUs	<i>1</i>	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	<i>0</i>	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	<i>1</i>	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	<i>0</i>			PSNC
Number of SIUs in SNC with self-monitoring	<i>0</i>			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	<i>0</i>	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	--			
Technical Evaluation of Local Limits (Y/N) (Audit)	--			
Adoption of technically-based limits (Y/N) (Audit)	--			

II. RNC/SNC WORKSHEET				
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC				
	RNC	Level	Reference	
			PCI	Audit
-	Failure to enforce against pass through and/or interference	I		
X	Failure to submit required reports within 30 days	I		
-	Failure to meet compliance schedule milestone date within 90 days	I		
-	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.2.b	II.D.1.b
X	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.1	II.F.1
-	Failure to enforce pretreatment standards and reporting requirements	II		I.C.1
-	Other (specify)	II		
SNC				
X	Control Authority in SNC for violation of any Level I criterion			
-	Control Authority in SNC for violation of two or more Level II criterion			

IU SITE VISIT DATA SHEET

IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry <i>Unison Industries (Plant 3 and 4) , Dayton, Ohio 45459</i>	
Date of visit <i>March 12, 2013</i>	Time of visit <i>11:00 am</i>
Name(s) of inspector(s) <i>Jim Martin, Bob Ostendorf Jr.</i>	
Provide name(s) and title(s) of industry representative(s).	
Name	Title
<i>James Sumner</i>	<i>Environmental Health and Safety Manager</i>
<i>Garrett Crist</i>	<i>EHS Generalist</i>
Classification assigned by CA: <i>Categorical SIU (433.17)</i>	
Did the CA inspector review/obtain the following as part of the industrial inspection?	
1. Description of the products manufactured or the services provided by the IU. <i>Yes.</i>	
2. Verification of the IU's classification or discussion of any changes. <i>Yes.</i>	
3. Description of any significant changes in processes or flow. <i>Yes.</i>	
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.) <i>Yes.</i>	
5. Description of the sample location and any differences in CA and IU locations. <i>Yes.</i>	
6. Description of the treatment system which is in place. <i>Yes.</i>	
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention. <i>Yes.</i>	
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems. <i>Yes.</i>	
Notes: <ul style="list-style-type: none"> - <i>Discussed the development and implementation of a TOMP.</i> - <i>Discussed the potential presence of cobalt in the wastewater discharge.</i> - <i>Discussed the potential of a new sampling point which would allow for the discontinued use of the Combined Wastestream Formula.</i> - <i>Discussed the TTO sampling requirements that include the required sample type for the volatile pollutants (Method 624).</i> 	

IU SITE VISIT DATA SHEET (Continued)

IU Name. <i>Unison Industries (Plants 3 and 4)</i>	Date <i>March 12, 2013</i>
Notes: <p style="margin-left: 40px;"><i>- Discussed and toured the new pretreatment system for Plant 4. During the discussion it was discovered that the pretreatment system will be contract operated for the first year of operation.</i></p>	

IU SITE VISIT REPORT FORM	<i>Bob Ostendorf Jr.</i>	DATE: <i>March 12, 2013</i>
COMPLETED BY:		
TITLE:	<i>Environmental Specialist 2</i>	TELEPHONE: <i>937.285.6107</i>