



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

May 24, 2013

Mayor and Council
City of London
102 South Main Street
P.O. Box 188
London, OH 43140

**Re: Industrial Pretreatment Reconnaissance Inspection, April 2, 2013
City of London WWTP 4PC00003*LD / OH0023779**

Ladies and Gentlemen:

On April 2, 2013, I conducted a Pretreatment Reconnaissance Inspection (PRI) of the City of London's Industrial Pretreatment Program (IPP). During the inspection, I interviewed Dan Leavitt, Pretreatment Coordinator and wastewater treatment plant (WWTP) operations manager for the City of London. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and City of London's National Pollutant Discharge Elimination System (NPDES) permit. Attached you will find the PRI report.

The findings of the PRI are as follows:

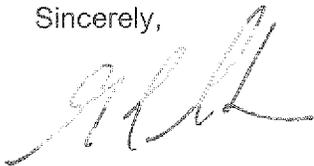
1. Overall, the City of London's IPP has been successful in controlling industrial user discharges to the City of London's WWTP. There have been four episodes of industrial users causing the city's WWTP to violate their NPDES permit in the past two years. The pretreatment coordinator is doing a good job of administering the program. Two of the violations were for molybdenum in the sludge which was possibly from a non-contact cooling water discharge from an industrial source. The other two violations were oil and grease and a minor pH violation which could not be traced to a specific industry.
2. The City of London has submitted required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in the NPDES permit for the PRI time period. The PRI time period is from March 1, 2011 through March 1, 2013.
3. Inspections and sampling of all required parameters were performed for the significant industrial user in 2011 and 2012.
4. The WWTP may accept a new waste hauler. The waste from the waste hauler will be separated and tested prior to providing additional treatment.

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Please acknowledge the receipt of this letter no later than June 21, 2013.

Ohio EPA recognizes the continuing commitment demonstrated by the City of London Pretreatment and wastewater treatment plant staff to implement state and federal pretreatment requirements. If you have any questions regarding the inspection findings feel free to contact me by e-mail at greg.sanders@epa.state.oh.us or phone at (614) 728-3851.

Sincerely,



Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: City of London PRI Forms

c: Ryan Laake, DSW/CO
Dan Leavitt, City of London WWTP

ec: Gregory Sanders, DSW/CDO

GS/nsm 2April2013PRIcoverletter_City of London



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

FACILITY NAME City of London WWTP		PERMIT NUMBER 4PC00003*LD	FACILITY NUMBER OH0023779
INSPECTION TYPE R	INSPECTOR S	FACILITY TYPE 1	DATE CONDUCTED March 12, 2013

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY City of London WWTP 4800 State Route 56 S.E. London, OH 43140
MAILING ADDRESS OF FACILITY Mayor and Council City of London 102 South Main Street P.O. Box 188 London, OH 43140
CONTACT (NAME/TITLE/PHONE) Dan Leavitt, City of London WWTP, Operations Manager & Pretreatment Coordinator; 740.852.0279

FACILITY EVALUATION													
(S = Satisfactory, M = Marginal, U = Unsatisfactory)													
<table border="1"> <tr> <td>S</td> <td>Pretreatment Reconnaissance Inspection (PRI)</td> </tr> <tr> <td></td> <td>Report attached</td> </tr> <tr> <td></td> <td>Inspection period; March 2011 through March 2013</td> </tr> </table>	S	Pretreatment Reconnaissance Inspection (PRI)		Report attached		Inspection period; March 2011 through March 2013	<table border="1"> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </table>						
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Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders 	Ohio EPA Division of Surface Water Central District Office 614.728.3851	Date 4-24-13
Signature of Reviewer Jeff Bohne, Supervisor 	Ohio EPA Division of Surface Water Central District Office 614.728.3843	Date 5-21-13

WENDB AND RNC WORKSHEET Reconnaissance Checklist

FACILITY INFORMATION	
Name City of London WWTP	
OH Number 4PC00003*LD	NPDES Number OH0023779
Date of Inspection April 2, 2013	

I. WENDB AND RNC ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
	Data	Checklist Reference	PCS Code
Number of SIUs	5	II.C.1	SIUS
Number of CIUs	1	II.C.1	CIUS
Number of SIUs without Control Mechanisms	0	II.C.1	NOCM
Number of SIUs not inspected or sampled	0	II.E.2	NOIN
Number of SIUs in SNC with standards or reporting	0	II.E.2	PSNC
Number of SIUs in SNC with self-monitoring	0	II.E.2	MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	0	II.E.2	SNIN

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
0	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
0	Failure to submit required reports within 30 days	I	
0	Failure to meet compliance schedule milestone date within 90 days	I	
0	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
0	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
0	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
	Other (specify)	II	
SNC			
0	Control Authority in SNC for violation of any Level I criterion		
0	Control Authority in SNC for violation of two or more Level II criterion		