



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

Re: **Notice of Violation**
Huron County
City of Bellevue WWTP
2PD00037*LD
Pretreatment Inspection

July 2, 2013

Mr. Jeff Crosby
Safety-Service Director
City of Bellevue
3000 Seneca Industrial Parkway
Bellevue, Ohio 44811

Dear Mr. Crosby:

On June 4, 2013, Mr. Andrew Gall conducted a pretreatment compliance inspection of the City of Bellevue's approved pretreatment program. The inspection consisted of an interview with Mr. Eric MacMichael, Wastewater Superintendent, utilizing a checklist to evaluate the administration of and compliance with pretreatment regulations. The file for Bunge North America (N.A.), Inc. was reviewed. Our inspection findings are summarized below:

1. The City issued a new industrial user (IU) permit to Bunge North America, Inc. on January 14, 2013. Bunge appealed the permit to City Council and a hearing was held on March 11, 2013. City Council voted to grant the appeal and allow Bunge N.A. a phosphorus discharge limit of 30 mg/L. The City of Bellevue local limit for phosphorus is 15.0 mg/l as approved by the Director of Ohio EPA in a letter dated June 8, 2012. The local limits are technically based in order to protect the wastewater treatment process. Granting a limit that is above the approved local limits is a violation of the City's Ohio EPA approved pretreatment program, as well as the Director's Final Findings and Orders (DFFOs) issued to the City on December 4, 2012. In order to issue a limit to an industrial user that is less stringent than the current Ohio EPA approved limit, the City would need to submit a pretreatment program modification request and technical justification for the less stringent limit. Therefore, the existing Ohio EPA approved phosphorus limit of 15.0 mg/l must be restored and remain in effect until the City obtains Ohio EPA approval for a technically justified less stringent limit.
2. Currently, Bunge N.A. submits monthly sampling reports to the City on a spreadsheet that is emailed to Mr. MacMichael. Bunge should be submitting hard copies of the reports in order to comply with Part II, Item D of their IU permit. In addition to the spreadsheet summarizing the results, Bunge should be submitting a copy of the sample results provided by the lab that analyzes the samples as well as a copy of the chain of custody forms used to track the sample after it is collected. This will enable the City to verify that holding times are being met and that the industrial users are using the analytical methods listed in 40 CRF 136. Hard copies of the monthly reports submitted by the industrial users must be maintained in the City's pretreatment files.

3. The City is analyzing samples of Bunge's discharge several times per week. If the results of the analysis conducted by the City shows that violations of the permit have occurred, the City should be documenting these violations using a Notice of Violation (NOV). A hard copy of the NOV and a copy of the City's sampling results and chain of custody form should be maintained in the City's pretreatment files.
4. Permit limit violations of the industrial user permits are not being properly documented. Currently, when a violation occurs, an email is sent to the industry with copy of the "surcharge spreadsheet". The City must document all permit violations by sending a written NOV that identifies the violation that occurred. The NOV should direct the industrial user to submit a written response to the NOV that explains the cause of the violation and steps that will be taken to prevent future violations from occurring. A hard copy of the NOV issued by the City and a hard copy of the industry's signed written response along with a copy of the resample results must be maintained in the City's pretreatment files.
5. Bunge's IU permit requires them to submit Total Toxic Organic (TTO) sampling results twice per year or develop a Toxic Organic Management Plan (TOMP). A hard copy of the TOMP or the biannual TTO sampling results must be maintained in the City's pretreatment files.
6. Bunge's permit contains a Compliance Schedule to submit an updated slug discharge plan to the City. In a letter to Mr. MacMichael dated May 29, 2013, Bunge indicates that they have submitted the Slug Discharge Plan to the City. The City should review the slug discharge control plan and notify Bunge if it is acceptable or not. As other industrial users submit updated slug discharge control plans, they should also be reviewed and the industrial user notified if it is acceptable or not. Hard copies of the slug discharge plans should be maintained in the City pretreatment files.
7. Bunge submitted a copy of an evaluation of their pretreatment system to the City of Bellevue and to Ohio EPA in April 2013. Ohio EPA has reviewed the evaluation of the pretreatment system prepared by AWT, Inc. and it includes several recommendations for upgrades and operational modifications that can help improve Bunge's discharge to the City. However, the report does not contain any indication from Bunge as to which of the suggested upgrades and operational modifications they will be implementing in order to improve the pretreatment system operation and discharge. The City should submit a response letter to Bunge requesting that they submit a written response identifying the upgrades and changes they plan to make.
8. The City did conduct compliance inspections of all of the industrial users in 2012. Please make sure that all industrial users are inspected in 2013 and hard copies of the inspection documents are maintained in the pretreatment files.
9. After our inspection in 2012, an industrial waste survey (IWS) was sent out to all of the industries in Bellevue. Copies of the completed IWS survey should be on file for all industries that discharge to the City sewer system. It is very important that an updated IWS be on file at the wastewater treatment plant (WWTP) for all of the industries/commercial facilities in Bellevue. After receiving the updated IWS, the City should be evaluating them to determine if any new or existing facilities need to obtain an IU permit. For example, it was indicated that a new tank truck washing business recently opened in Bellevue. The industrial pretreatment standards for Transportation Equipment Cleaning as outlined in 40 CFR 442 likely apply to this business. Also, the Bellevue Hospital may need to obtain an IU permit, based on the requirements of 40 CFR 403.

Mr. Jeff Crosby
July 2, 2013
Page Three

Overall, significantly more staff time and resources need to be devoted to properly implementing the industrial pretreatment program and maintaining the required records to document compliance with all program requirements.

Please inform this office in writing, within 30 days, of the actions that will be taken to improve the implementation of Bellevue's approved pretreatment program and return to compliance with the DFFOs. The response should include the dates, either actual or proposed, for completion of the actions.

Our completed inspection form is enclosed for your review. If you have any questions or if you would like to meet with us to discuss any of these deficiencies, please contact Mr. Gall at (419) 373-3003 or via email at andrew.gall@epa.ohio.gov.

Yours truly,



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

AG/jlm

Enclosure

pc: Mr. Eric MacMichael, WWTP Superintendent

ec: Mr. Ryan Laake, DSW-CO
Tracking



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME
City of Bellevue WWTP

PERMIT NUMBER
2PD00037*MD

FACILITY NUMBER
OH0020672

INSPECTION TYPE PCI INSPECTOR Gall FACILITY TYPE 1 DATE CONDUCTED 06/04/2013

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
City of Bellevue WWTP
500 Great Lakes Parkway
Bellevue, OH

MAILING ADDRESS OF FACILITY
3000 Seneca Industrial Pkwy.
Bellevue, OH 44811

CONTACT (NAME/TITLE/PHONE)
Eric MacMichael, Superintendent 419-483-7514

FACILITY EVALUATION

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

* See inspection letter

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
Andrew Gall, P.E. <i>Andrew Gall</i>	OEPA/NWDO/ 419-373-3003	6/26/13
Signature of Reviewer <i>Thomas Poffenbarger</i>	Ohio EPA / NWDO / 419-373-3000	Date 6/26/13

POTW PRETREATMENT COMPLIANCE CHECKLIST

PCI CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation
 Section II Supplemental Data Review/Interview
 Section III Evaluation and Summary (Optional)

Attachment A Pre-Inspection Checklist

Attachment B Pretreatment Program Profile

Attachment C Worksheets

WENDB/ RNC Worksheet

IU Site Visit Report Form (Optional)

File Review Worksheets (Optional)

Attachment D Supporting Documentation

Control Authority (CA) name and address

City of Bellevue WWTP
500 Great Lakes Parkway
Bellevue, OH 44811

Date(s) of PCI

06/04/2013

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Andrew Gall	Environmental Specialist II/ Ohio EPA NWDO	419-373-3003

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
Eric MacMichael	Superintendent City of Bellevue WWTP	419-483-7515

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.

IU IDENTIFICATION

FILE 1 Industry name and address
 Bunge North America, LLC
 605 Goodrich Rd.
 Bellevue, OH 448111

Type of industry:
 Soybean Processing

IU CLASSIFICATION BY CA:
 Categorical SIU - 40 CFR _____, _____,
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd) 150,000
 Average process flow (gpd) 150,000

Industry visited during PCI? Yes No

COMPLIANCE STATUS

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

EXPLANATION:
 Comments

FILE ____ Industry name and address

Type of industry

IU CLASSIFICATION BY CA:
 Categorical SIU - 40 CFR _____, _____,
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd) _____
 Average process flow (gpd) _____

Industry visited during PCI? Yes No

COMPLIANCE STATUS

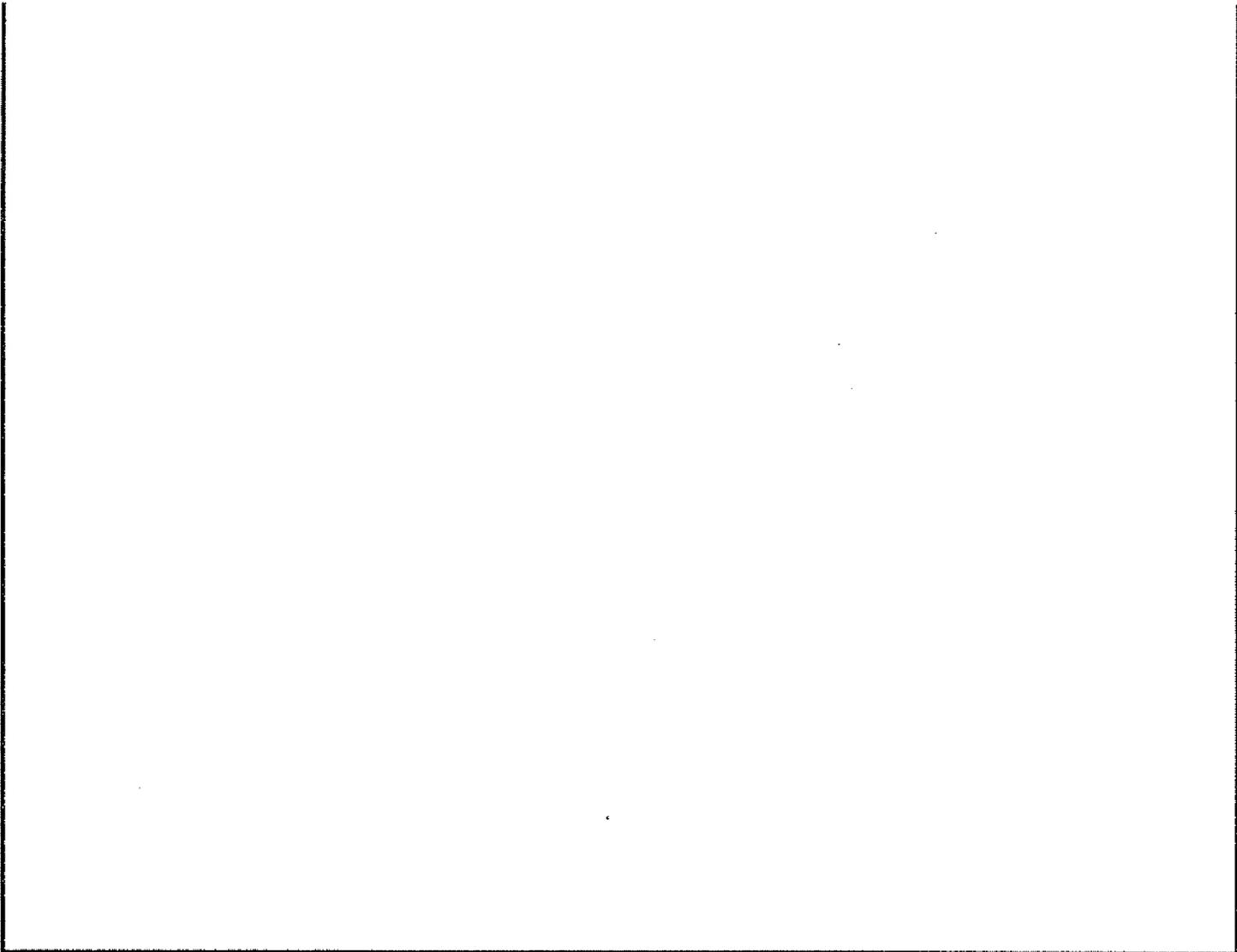
SNC (period: _____) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION:

Comments

SECTION I: IU FILE EVALUATION

Industry Name					INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Use NA (not available) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Use an "x" in the space when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.
File I	File	File	File	File	
					IU FILE REVIEW
					A. CA NOTIFICATION OF IU
X					1. Notified of classification (new IU) or change in classification (existing IU)
X					* BMR/90-day report submitted (for new IU)
X					2. Notified of applicable RCRA standards
Comments					Reg. Cite



SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
X					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
X					a. Statement of duration (<5 years)	
X					b. Statement of nontransferability w/o prior notification	
X					c. Listing of applicable effluent limits (local, categorical standards)	
					d. Selfmonitoring requirements	
X					i. Identification of pollutants to be monitored	
X					ii. Sampling frequency	
X					iii. Sampling at locations/discharge points adequately defined	
X					iv. Appropriate sample types (grab or composite)	

B. ISSUANCE OF IU CONTROL MECHANISM				
X				v. Reporting requirements
X				vi. Record-keeping requirements (3 years minimum)
X				e. Statement of applicable civil and criminal penalties
X				f. Compliance schedules
X				g. Requirement to notify CA of slug loadings
X				h. Requirement to notify CA of spills, bypasses, upsets, etc.
X				i. Requirement to notify CA of significant change in discharge
X				j. 24-hour notification of violation/resample requirement

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
X					1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards:	403.8(d)(1)(ii)
X					a. Proper classification by category/subcategory	
X					b. Proper classification as new/existing source	
X					c. Proper application of limits for all regulated pollutants	
X					d. Proper calculation and application of production-based standards	403.6(c)
X					e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
					3. Application of local limits	
					4. Application of most stringent limits	403.8(f)(1)(ii)

Comments:

Items 3 & 4 – City is not applying local limit for phosphorus. Bunge was granted an appeal by City Council for Phosphorus limit of 30.0 mg/l.
The local limit for phosphorus approved by Ohio EPA on June 8, 2012 is 15.0 mg/l.

SECTION I: IU FILE EVALUATION (Continued)

File I	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	403.8(f)(1)(iii)(D)
X					1. Sampled at frequency specified in approved	
X					2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
X					3. Sampled all parameters for which local or categorical limits applied	
X					4. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	403.8(f)(2)(v)
X					1. Inspected at frequency specified in approved program	
X					2. Documentation of inspection activities	403.8(f)(2)(vi)
X					3. Evaluated need for slug discharge control plan at least every two years	403.8(f)(2)(v)

Comments:

All industrial users were inspected in 2012. As inspections are completed in 2013, City needs to ensure that the inspections are properly documented and copies of the inspection forms and any follow up correspondence is maintained in the City's pretreatment file.

The City needs to make sure that hard copies of compliance sampling results and chain of custody forms are maintained in pretreatment files.

New industrial user permits were issued the last year after local limits review was completed. The new permit require the industrial users to submit slug discharge control plan within 90 days of the permit effective date. As permits are good for five years, the City will need to have slug discharge plans re-evaluated by the industries mid permit cycle.

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
E. CA ENFORCEMENT ACTIVITIES						
X					1. Response to violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
NA					c. Compliance schedule violations	
NA					2. Proper calculation of SNC	403.8(f)(2)(vii)
NA					a. Chronic	
NA					b. TRC	
NA					c. Pass-through/interference caused by spill or slug discharge	
NA					d. Reporting requirements	
NA					3. Publication for SNC	403.8(f)(2)(vii)
X					4. Adherence to approved ERP	403.8(f)(5)
					a. Proper response to violations	
X					b. Escalation of enforcement	

Comments:

The City is not properly documenting discharge violations and monitoring/reporting violations. Currently, an email and surcharge bill is sent to the industries. The City needs to start issuing NOV letters to the industries for violations. NOV letters should be sent for violations of self monitoring by the industries or monitoring that is conducted by the City. NOV's should also be sent for incidents of plant interference as a result of discharge from industrial users. Hard copies of the NOV's, sampling results and responses from the industries should be maintained in the City files.

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. SELF-MONITORING AND REPORTING	
X					1. Sampled at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. TTO Requirements met	
					a. TOMP submitted and updated (if applicable)	
					b. TTO sample results or certification statement submitted as required	
X					3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
X					4. Reported for all required pollutants	403.12(g)(1)&(h)
					5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
X					6. Met compliance schedule milestones by required dates	403.12(c)
X					7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
X					8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
					9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
X					10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
X					11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:

Item 2. – New permits require the TOMP to be submitted within 90 days of permit effective date. If industry elects to do sampling in lieu of the TOMP they will need to submit TTO results twice per year in March and September. Hard copies of the TOMP or the sampling results need to be maintained in the City pretreatment files.

Item 5. – Need to make sure that all the reports are being submitted to the City per the requirements of Part 3 Item D. of the Industrial user permits. Hard copies of the monitoring reports, lab reports and chain of custody need to be maintained in the City pretreatment files.

Item 9. – City needs to make sure that resampling requirements are being met when industrial users have limit violations.

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments:

SECTION I COMPLETED BY:	Andrew Gall	DATE:	06/26/2013
TITLE:	ESII	TELEPHONE:	419-373-3003

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. Have you made any changes to the approved program since the last inspection? (Local limits, ERP, SUO, control mechanisms, SIU list, etc.)

Yes

No

X

If yes, discuss.

Local limits were approved by Ohio EPA in June, 2012. The City Sewer Use Ordinance was updated and new industrial user permits were issued to incorporate the new limits and new SUO requirements in late 2012.

Bunge N.A. appealed their new industrial user permit to City Council. Appeal was granted by council, to allow a phosphorus limit of 30 mg/l for Bunge.

2. Have you identified any needed changes?
If yes, describe.

Yes	No
	X

B. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How do you identify and characterize new IUs?
(is IWS used?)

Through notification from City office, Chamber of Commerce and Industrial Waste Survey (IWS). The City needs to make sure that they have updated IWS on file for all industries that discharge to POTW. The IWS should be reviewed in order to determine if new and existing industries need to have industrial permit coverage.

2. How and when do you identify changes in wastewater discharges at existing IUs
(especially to determine if they need to be classified as a SIUs)

Facility inspections, review of self monitoring and compliance sampling results

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENB~NOCM][RNC~I]
If any, explain.

0	%
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2. a. How many control mechanisms were allowed to expire prior to reissuance?

0

If any explain.

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-11]

0

If any, explain.

c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?

Yes	No
X	

IWS Form updated and sent out in 2012.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS [403.8(f)(1)(ii)]

1. a. How and when do you evaluate SIUs for the need to develop slug control discharge plans?

(check on CA's definition of slug discharge)

If any, explain.

The renewal industrial user permits contained required each industrial user to develop and submit an updated slug discharge control plan to the City within 90 days of the permit effective date. The City should maintain a hard copy of the slug plans in their pretreatment files.

b. How many SIUs were evaluated in the past two years?
 All of the permitted industrial users were inspection in 2012.

ALL in 2012

2. a. Describe any wastes hauled to the POTW.

Septage – All septage haulers submit a manifest and provide a sample of the septage.

b. If any IUs have their wastewater hauled to the POTW, how do you ensure all applicable standards (local and categorical) are met?

Local limits through random analysis of samples.

c. List IUs that haul their wastewater to the POTW.

None

E. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were the following: [403.8(f)(2)(v)][WENDB-NOIN][RNC II]
 (Define the 12 month period_5/1/2012to 6/1/2013.)

a. Not sampled or not inspected at least once [WENB-NOIN]

0	%
0	%
0	%

b. Not sampled at least once

c. Not inspected at least once (all parameters)?

If any, explain.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB-SNIN]

0

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT

1. Which of the following enforcement actions did you use during the past year?

a. Notice or letter of violation

Yes	No
X	

G. GENERAL OBSERVATIONS INFORMATION ENFORCEMENT

Have you had any problems (general or specific) implementing your approved program?

Yes	No
X	

The City needs to dedicate significantly more time to implementing the pre-treatment program and maintaining necessary information to document pre-treatment activities.

Additional Comments/Observations/Information:

SECTION I. COMPLETED BY: Andrew Gall	DATE: 06/26/2013
TITLE: ES II	TELEPHONE: 419-373-3003

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
• Status of program modifications (Ref. 403.18 /Checklist II.A.1)	None	

Description	Recommended Action	Required Action
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2) 	None	
<ul style="list-style-type: none"> Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1) 	N/A	
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2) 	Yes	
<p>The City needs to have updated Industrial Waste Survey's (IWS) on file for all existing industries as well as any new industries that open. The IWS should be reviewed and industrial user permits should be issued when appropriate to protect the wastewater treatment.</p>		

Description	Recommended Action	Required Action
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> • Issuance of individual control mechanisms to all STUs (Ref. 403.8(f)(1)(iii)/ Checklist II.D.1) 	None	
Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)	None	
Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&4)	NONE	

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) 	None	
<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) 	YES	
<p>The City needs to make sure that the most stringent or either the categorical limits or the local limits are being applied to all industries.</p>		
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) 	None	
<ul style="list-style-type: none"> Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) 	YES	
<p>The City needs to make sure that inspections of industrial users are being done per the requirements of their approved program. Hard copies of inspection forms and reports should be maintained in the City pretreatment files.</p>		

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) 	None	
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) 	Yes	
<p>The City needs to make sure industrial users are submitting self –monitoring reports following the procedure outlined in the industrial user permits. Hard copies of the sampling results, lab report and chain custody forms should be maintained in the City pretreatment files.</p>		
<p>Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)</p>	None	
<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) 	None	

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) <p>The City needs to ensure that resampling requirements are being met after effluent limit violations occur.</p>	YES	
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) 	None	
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	None	

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) 	None	
<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) 	YES	
<p>The City needs to make sure Notice of Violation (NOV)'s are issued when violations occur. The NOV should list the violation that occurred and request that the industry submit a response indicating how they will address the violation and steps that will be taken to prevent future violations for occurring.</p>		
<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) 	None	
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I. RESOURCES

<ul style="list-style-type: none"> Adequate resources (Ref. 403.8(f)(3)/Checklist II.I) 	Yes	
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The City needs to devote significantly more staff time to the implementation of the pretreatment program in order to comply with the requirements of their approved program.

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

<ul style="list-style-type: none"> Understanding of pollutants from all sources (Checklist II.J.1&2) 	None	
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Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness (Checklist II.J.1) 	None	
<ul style="list-style-type: none"> Integration of pollution prevention (Checklist II.J.3,4&5) 	None	
K. ADDITIONAL EVALUATIONS/INFORMATION		

Description	Recommended Action	Required Action

SECTION III COMPLETED BY:	Andrew Gall	DATE:	06/26/2013
	TITLE: ES II	TELEPHONE:	419-373-3003

WENDB AND RNC WORKSHEET

FACILITY INFORMATION	
Name City of Bellevue WWTP	Date of Inspection 06/04/2013
OH Number OH0020672	NPDES Number 2PD00037*MD
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	1	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)	-			
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		
-	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
-	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				
-	Control Authority in SNC for violation of any Level I criterion			
-	Control Authority in SNC for violation of two or more Level II criterion			