



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

Re: Richland County
City of Mansfield WWTP
Pretreatment

July 2, 2013

Mr. Angelo Klousiadis
Interim Public Works Director
City of Mansfield
30 North Diamond Street
Mansfield, Ohio 44905

Dear Mr. Klousiadis:

On June 13, 2013, Walter Ariss conducted an inspection of the City's approved pretreatment program. The inspection followed a checklist designed to evaluate the major areas of the City's program. Our inspection findings and recommendations are summarized below.

The files of two industrial users, Broshco Fabricated Products and Jones Potato Chips Company, were reviewed. These files were well maintained with all necessary contents in order. On Page 5 of the permit issued to Broshco, limits for hexavalent chromium, oil and grease total, and total suspended solids are indicated under the categorical columns. Please be aware that 40 CFR 433.17 does not contain limits for these parameters. The permit should be modified to remove the information in these columns. The City may choose to remove the testing for these parameters completely. On Page 4 of the permit for Jones Potato Chips, a limit and monitoring requirement is included for Antimony. The City of Mansfield does not have a technically justified local limit for this parameter. The limit should be removed from the Jones Potato Chip permit. Monitoring may remain at the City's discretion. Jones is also subject to the categorical pretreatment standards under 40 CFR 407.8. This section requires monitoring for BOD₅, TSS, O&G. Monitoring for these parameters should be added to Jones permit and reference to the fact that the discharge is subject to 40 CFR 407 should be included in the permit.

Broshco was found to have installed upgrades to their pretreatment system prior to having an approved Permit to Install (PTI) from our office. Our office is currently working with the entity to get an approved PTI for the upgrades. Broshco will most likely be facing some sort of monetary penalty for failure to have an approved PTI prior to installation. There was also

Mr. Angelo Klousiadis
July 2, 2013
Page Two

some discussion in the Jones Potato Chip file of modifications to their clarifier system recently. As the primary contact with the industrial users in the City, we urge you to stress the importance of getting approved PTIs for any modification to, or installation of, pretreatment equipment at their facility. Should you become aware of any such work being planned or completed, you should contact our office to share this information so that we may follow up accordingly.

The acceptance of landfill leachate at the wastewater treatment plant (WWTP) has yet to be placed under a permit. A permit should also be issued to Richland County for the acceptance of leachate via dedicated pipe from the former county landfill. Landfills are subject to pretreatment regulations under 40 CFR 445.3 and 403. This shall be completed no later than September 1, 2013. In our previous inspection report from June 2012, we granted the City until September of 2012 to issue these permits; however, this was not completed. Failure to meet the 2013 deadline may lead to escalated enforcement action.

An industrial waste survey was distributed to the majority of the industries in late 2011. These surveys have all been reviewed and it was determined that no new permits were needed. Our office has identified several potential industrial users that may have waste streams that are subject to federal pretreatment standards and, therefore, in need of permit coverage. These facilities include: National Material Company, AS America-Crane Plumbing, Ohio Valley Manufacturing, Brost Foundry, Gorman Rupp, Warren Rupp, Jay Plastics, PPC-Great Stuff, MK-Metal Products, Moritz Trailers, Weiss Industries, and Milark Industries. Several industries may be subject to the metal finishing standards in 40 CFR 433 or plastics molding and forming under 40 CFR 463. Our office is requesting confirmation that these facilities do not need permit coverage. **Within 60 days** of the date of this letter, please submit to our office a summary of why these facilities are not subject to pretreatment permit needs. This summary should include a discussion of whether process waters are generated at the facility and if so, where those waters are disposed. If process waters are generated, a description of the source and the amount of discharge should also be included.

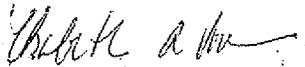
In our inspection report from last year, we requested that Newman Technology be evaluated for the need for coverage under a pretreatment permit. An update on this determination should be included in the summary for the other facilities above.

At the time of the inspection, it was observed that a delivery of hauled waste was being accepted via a dedicated pipe outside the WWTP fence line that leads to the influent channel prior to the headworks and primary treatment bypass. The screw pumps to the equalization basin were active at this time. The SOP that was developed for the acceptance of hauled wastes at the WWTP and submitted to our office indicates that during high flow periods, when the screw pumps to the EQ basin are active, all hauled wastes must be delivered to the aerated grit chamber before the primary tanks and after the bypass weirs. This assures that these high strength wastes receive full treatment. Policing of hauled waste deliveries during high flow periods at the WWTP needs to be enhanced.

Mr. Angelo Klousiadis
July 2, 2013
Page Three

In summary, it appears that the City is maintaining an adequate pretreatment program; however, room for improvement is evident from the deficiencies noted above. We will await your confirmation regarding the issuance of the permits to the landfills and look forward to receiving your report on the industrial users. A copy of our completed inspection form is enclosed for your review. If you have any questions, please call Walter Ariss at (419) 373-3070.

Sincerely,



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

WA/jlm

Enclosure

pc: Marc Morgan, City of Mansfield WWTP
Carline Curry, City of Mansfield WWTP

ec: Ryan Laake, DSW CO
Tracking



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME <i>City of Mansfield</i>		PERMIT NUMBER <i>2PE00001</i>	FACILITY NUMBER
INSPECTION TYPE <i>PCI</i>	INSPECTOR <i>Walter Ariss</i>	FACILITY TYPE	DATE CONDUCTED <i>June 13, 2013</i>

GENERAL INFORMATION	
NAME AND LOCATION OF FACILITY <i>City of Mansfield WWTP 385 South Illinois Avenue Mansfield, Ohio 44905</i>	
MAILING ADDRESS OF FACILITY <i>Mansfield WWTP 385 South Illinois Avenue Mansfield, Ohio 44905</i>	
CONTACT (NAME/TITLE/PHONE) <i>Carline Curry, Industrial Pretreatment Coordinator 419-589-2830</i>	

FACILITY EVALUATION													
(S = Satisfactory, M = Marginal, U = Unsatisfactory)													
<table border="1" style="width: 100%; height: 100%;"> <tr><td style="width: 50px; height: 20px;"></td><td></td></tr> <tr><td style="width: 50px; height: 20px;"></td><td></td></tr> <tr><td style="width: 50px; height: 20px;"></td><td></td></tr> </table>							<table border="1" style="width: 100%; height: 100%;"> <tr><td style="width: 50px; height: 20px;"></td><td></td></tr> <tr><td style="width: 50px; height: 20px;"></td><td></td></tr> <tr><td style="width: 50px; height: 20px;"></td><td></td></tr> </table>						
* See inspection letter													

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
<i>Walter Ariss</i>	Ohio EPA / NWDO / 419-373-3070	<i>6/13/13</i>
Signature of Reviewer		Date
<i>Thomas Poffliger</i>	Ohio EPA/NWDO/419-373-3000	<i>6/26/13</i>

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	Date(s) of PCI
<i>City of Mansfield</i> <i>385 South Illinois Avenue</i> <i>Mansfield, Ohio 44905</i>	June 13, 2013

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
<i>Walter Ariss</i>	Ohio EPA	419-373-3070

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
<i>Carline Curry</i>	<i>Industrial Pretreatment Coordinator</i>	419-589-2830

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 <u>1</u> Industry name and address <i>Brashco</i> <i>1595 W. Longview</i> <i>Mansfield, Ohio 44906</i>	Type of industry Metal processing of auto parts, E-coating	
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> Categorical SIU - 40 CFR 433, _____, Category(ies) Metal finishing <input type="checkbox"/> Non-categorical SIU	Average total flow (gpd) 75,000	Average process flow (gpd) 75,000
<input type="checkbox"/> Non SIU	Industry visited during PCI? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

Comments: Facility recently installed new pretreatment system in order to meet effluent limits. they had been issued a compliance schedule by the City.

FILE <u>2</u> Industry name and address <i>Jones Potato Chips Company</i> <i>823 Bowman St.</i> <i>Mansfield, Ohio 44903</i>	Type of industry <i>Potato washing, peeling, and cooking. Chip manufacturing.</i>	
IU CLASSIFICATION BY CA: <input type="checkbox"/> Categorical SIU - 40 CFR _____, _____, Category(ies) centralized waste treatment <input type="checkbox"/> Non-categorical SIU	Average total flow (gpd) 25,000	Average process flow (gpd) 25,000
<input checked="" type="checkbox"/> Non SIU	Industry visited during PCI? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

COMPLIANCE STATUS

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

Comments

In December 2012 facility installed some new valving in order to isolate the pretreatment device if a spill were to occur.

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 <u>1</u>	File <u>2</u>	File	File	File		
x	x				IU FILE REVIEW	Reg. Cite
A. CA NOTIFICATION OF IU						
NA	NA				1. Notified of classification (new IU) or change in classification (existing IU)	403.8(f)(2)(iii)
x	x				* BMR/90-day report submitted (for new IU)	403.12(b)&(d)
					2. Notified of applicable RCRA standards	403.8(f)(2)(iii)
Comments						

SECTION I: IU FILE EVALUATION (Continued)

File 1	File 2	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
x	x				1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
x	x				a. Statement of duration (< 5 years)	
x	x				b. Statement of nontransferability w/o prior-notification	
x					c. Listing of applicable effluent limits (local, categorical standards)	
					d. Selfmonitoring requirements	
x	x				i Identification of pollutants to be monitored	
x	x				ii Sampling frequency	
x	x				iii Sampling at locations/discharge points adequately defined	
x	x				iv Appropriate sample types (grab or composite)	
x	x				v Reporting requirements	
x	x				vi Record-keeping requirements (3 years minimum)	
x	x				e. Statement of applicable civil and criminal penalties	
x	x				f. Compliance schedules	
x	x				g. Requirement to notify CA of slug loadings	
x	x				h. Requirement to notify CA of spills, bypasses, upsets, etc.	
x	x				i. Requirement to notify CA of significant change in discharge	
x	x				j. 24-hour notification of violation/resample requirement	

Comments:

Jones Potato Chips Company – question 2c – It should be noted in the permit somewhere that Jones is subject to pretreatment standards under 40 CFR 407.8, Canned and Preserved Fruits and Vegetables Processing Point Source Category, Subpart H.

SECTION I: IU FILE EVALUATION (Continued)

File <u>1</u>	File <u>2</u>	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
x	n				1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(ii)
x	x				2. Calculation and application of categorical standards	403.8(f)(1)(ii)
x	n				a. Proper classification by category/subcategory	
x	x				b. Proper classification as new/existing source	
n	n				c. Proper application of limits for all regulated pollutants	
x	x				d. Proper calculation and application of production-based standards	403.6(c)
x	x				e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
x	x				3. Application of local limits	
x	x				4. Application of most stringent limits	403.8(f)(1)(ii)
<p>Comments:</p> <p>Jones Potato Chips Company – question 1, 2, and 3 – It should be noted in the permit somewhere that Jones is subject to pretreatment standards under 40 CFR 407.8, Canned and Preserved Fruits and Vegetables Processing Point Source Category, Subpart H. Jones permit includes a limit and monitoring requirement for Antimony. Antimony is not required as part of your local limits or the categorical standards.</p> <p>Broshco – question 2c – The permit lists hexavalent chromium, O&G-Total, and TSS, as regulated by categorical pretreatment standards. This is not the case. Hexavalent chromium is regulated by the local limits only and TSS and O&G are not regulated in the categorical standard. The pretreatment standards for new sources under section 40 CFR 433.17 apply to Broshco. The permit should be modified on page 5 as appropriate.</p>						

SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

Inspection – question 3 – a request for updated slug discharge plans was sent to each facility in March 2013.

SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

SECTION I COMPLETED BY: Walter Ariss	DATE: June 13, 2013
TITLE: ES II	TELEPHONE: 419-373-3070

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit 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

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

Yes	No
	x

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

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

The IWS that was sent out in late 2011 have all been reviewed, no new permits were issued.

Still not having any communication from codes and permits on when new industries locate in town.

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)

During on site inspections, through phone calls, data disclosure forms that are submitted every year

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	0%
---	---	----

2. a. How many control mechanisms were allowed to expire prior to reissuance? If any explain.		0
--	--	---

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC~II] If any, explain.		0
---	--	---

c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?	Yes	No
	x	

Data disclosure forms are submitted every year for all IUs

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

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.

Emails were sent in March 2013 requesting updates to the existing plans.

b. How many SIUs were evaluated in the past two years?

all

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

Leachate from Crawford County Landfill, holding tank waste from Clear Fork Reservoir

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

None

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 __Jan__ to __Dec__.)

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

0	0%
---	----

b. Not sampled at least once

0	0%
---	----

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

0	0%
---	----

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
- b. Administrative Order
- c. Administrative fine
- d. Show cause hearing
- e. Compliance schedule
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of service
- j. Other (specify)

Yes	No
x	
	x
	x
	x
x	
	x
	x
	x
	x

Explain if appropriate:

Compliance schedule was issued to Broshco.

2. Did the treatment plant experience any following during the past year?

- a. Interference
- b. Pass through
- c. Fire or explosions (flashpoint, etc.)
- d. Corrosive structural damage
- e. Flow obstructions
- f. Excessive flow rates
- g. Excessive pollutant concentrations
- h. Heat problems
- i. Interference due to O & G
- j. Toxic fumes
- k. Illicit dumping of hauled wastes
- l. Worker health and safety concerns
- m. Other (specify)

Yes	No	Explain
	x	
	x	
	x	
	x	
	x	
	x	
	x	
	x	
	x	
	x	
	x	

If yes, how did you respond?

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT (continued)					
3. Were you made aware of any hazardous waste discharges to the POTW? [403.12 (j)&(p)]	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Yes</th> <th style="width: 50%; text-align: center;">No</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </tbody> </table>	Yes	No	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input checked="" type="checkbox"/>				
G. GENERAL OBSERVATIONS/INFORMATION ENFORCEMENT					
Have you had any problems (general or specific) implementing your approved program?	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Yes</th> <th style="width: 50%; text-align: center;">No</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </tbody> </table>	Yes	No	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input checked="" type="checkbox"/>				
Additional Comments/Observations/Information:					

SECTION I COMPLETED BY: Walter Ariss	DATE: June 13, 2013
TITLE: ES II	TELEPHONE: 419-373-3070

SECTION III: EVALUATION AND SUMMARY

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) 	None	None
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2) 	None	None
<ul style="list-style-type: none"> Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1) 	None	None

C. IU CHARACTERIZATION

- Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)

None

YES

Jones Potato Chips Company should be modified to indicate that they are a categorical user.

D. CONTROL MECHANISM

- Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1)

None

None

Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)

None

None

Description	Recommended Action	Required Action
Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&4)	None	Yes
<p>Permits have still not been issued for acceptance of leachate. A permit should also be issued for the former Richland County landfill leachate collection forcemain.</p>		
<p>E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</p>		
<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	None
<p>Jones Potato Chips Company should be modified to indicate that they are a categorical user.</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) 	None	None
<p>F. COMPLIANCE MONITORING</p>		
<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	None

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) 	None	None
<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	None
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) 	None	None
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)	None	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	None
<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) 	None	None
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	None

Description	Recommended Action	Required Action
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	None	None
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) 	None	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) 	None	None

Description	Recommended Action	Required Action
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<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	None
I. RESOURCES		
<ul style="list-style-type: none"> • Adequate resources (Ref. 403.8(f)(3)/Checklist II.I) 	None	None

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

Description	Recommended Action	Required Action
K. ADDITIONAL EVALUATIONS/INFORMATION		
This area is intentionally left blank for additional evaluations and information		

SECTION III COMPLETED BY:	Walter Ariss	DATE:	June 13, 2013
TITLE:	ES II	TELEPHONE:	419-373-3070

WENDB AND RNC WORKSHEET

FACILITY INFORMATION				
Name City of Mansfield	Date of Inspection June 13, 2013			
OH Number OH0023906	NPDES Number 2PE00001			
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	7	Annual	Annual	SIUS
Number of CIUs	5	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				