Ohio EPA
40 years and moving forward

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

June 27, 2013

RE: ASHTABULA CITY
INDUSTRIAL PRETREATMENT PROGRAM
PRETREATMENT PROGRAM AUDIT
NPDES PERMIT 3PE00002*ND
ASHTABULA COUNTY

NOTICE OF VIOLATION

James Timonere, City Manager
City of Ashtabula
4717 Main Avenue
Ashtabula, Ohio 44004

Dear Mr. Timonere:

This office conducted a Pretreatment Audit Inspection (PAI) of the City of Ashtabula Industrial Pretreatment Program (IPP) on June 19 and 25, 2013. The purpose of the inspection was to determine if the IPP is in compliance with state and federal pretreatment regulations and requirements. Donna Kniss and John Schmidt represented the Ohio EPA. Michael Mearini, wastewater treatment plant (WWTP) Superintendent, represented the City. One industry, Lake City Plating Plant 2, was visited during the inspection.

The audit showed that the program has numerous significant deficiencies resulting in an apparent inability to protect the WWTP against pass-through and interference, which is the purpose of an IPP. The deficiencies in the administration of the IPP are directly attributable to the City's failure to provide sufficient resources for the program administration, not Mr. Mearini's dedicated attempts to maintain the integrity of the IPP.

It is our understanding that the City is in the process of hiring someone to administer the IPP. After this person has been hired and has an opportunity to begin the administration of the IPP, this office will conduct a follow-up inspection to identify current deficiencies and assist the new pretreatment coordinator in prioritization of necessary changes to Ashtabula's Industrial Pretreatment Program.

One notable finding is that the influent and effluent mercury concentration rose significantly this part calendar year. The City is responsible for submitting a general mercury variance application with each National Pollutant Discharge Elimination System (NPDES) permit renewal. As part of the renewal process, the Ohio EPA reviews the implementation of the city's Plan of Study, Annual PMP reports, and mercury influent and effluent data. Failure to implement the provisions of the Plan of Study, to fulfill the requirements found in Parts II.X.1.d. and Z. of the NPDES permit, or to have mercury influent and effluent concentrations rise instead of fall or remain stable, can result in the City no longer qualifying for a general mercury variance.

Please respond to this office within 30 days of the receipt of this letter, identifying the additional resources, including personnel man-hours, that will be devoted to administration of the IPP. If you have any questions or comments, please contact me at (330) 963-1285. I can also be reached at donna.kniss@epa.state.oh.us.

Sincerely,

Donna J Kniss

Donna J. Kniss
District Engineer
Division of Surface Water

DJK/cs

cc: J.P.Ducro IV, President of Council
Michael Mearini, WWTP Superintendent, WWTP
Ryan Laake, Ohio EPA, DSW, CO

ec: John Schmidt, Ohio EPA, DSW, NEDO

File/Municipal Pretreatment/Correspondence-Inspection