



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott L. Kelly, Director

July 10, 2013

Chairman and Council
City of Washington Court House
105 North Street
Washington C.H., OH 43160

**Re: Industrial Pretreatment Reconnaissance Inspection, June 24, 2013
City of Washington Court House, Fayette County
Washington Court House WWTP 4PD00002*OD / OH0028002**

Ladies and Gentlemen:

On June 24, 2013, I conducted a Pretreatment Reconnaissance Inspection (PRI) of the City of Washington Court House's Industrial Pretreatment Program (IPP). I interviewed John Woodrow, pretreatment coordinator for the City of Washington Court House and discussed the pretreatment program at his office. The intent of the inspection was to determine the compliance of the IPP with state and federal pretreatment regulations and the Washington Court House 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 Washington Court House's IPP has been successful in controlling industrial user discharges to the wastewater treatment plant (WWTP). Mr. Woodrow is doing a good job administering the pretreatment program. There is not believed to be any episodes of industrial users causing the City's WWTP to violate their NPDES permit.
2. The City of Washington Court House has submitted required pretreatment reports, including Quarterly Industrial User Violation Reports and the Annual Pretreatment Report according to the schedule in their NPDES permit for the PRI time period of March 1, 2011 through June 24, 2013.
3. No reportable non-compliance (RNC) was identified during the PRI. Industrial user self-monitoring and Washington Court House independent user sampling has been or will be conducted according to program requirements for the PRI time period.
4. The number of significant industrial users was reduced from six to four. Smurfit-Stone (Rock Tenn) closed their facility and Sunshine Laundry was downgraded due to lack of volume and concentration from their discharge. YUSA is still the one categorical significant user. There are 12 minor industrial users.

5. There were numerous violations at the wastewater treatment plant during the inspection period. However, it does not appear that the violations were due to industrial discharges. The mercury violations could have been from mercury accumulating in the sludge in the collection system that was washed through during high flow events. Industrial users were inspected to determine if they were the cause of the mercury violations. There were no indications that the industries were the cause of the mercury violations.

There are no required or recommended actions that are needed by Washington Court House at this time.

No program deficiencies were identified during the PRI. Please continue to:

1. Ensure that the minimum industrial user inspection frequencies are met and documented in program files. It is recommended that cover letters summarizing inspection findings and required actions are sent along with the inspection report to the industrial users.
2. Washington Court House shall continue ongoing efforts to identify and categorize all industrial users, including non-significant industrial users. Industrial user information, including non-significant industrial users, shall be kept updated on Form AR-3 Industrial User Inventory and reported annually to the Ohio EPA in the Washington Court House Industrial Pretreatment Program Annual Report.
3. Washington Court House must periodically monitor (sample and/or inspect) non-significant industrial users at a frequency to ensure compliance with pretreatment standards and requirements. Updated information must be kept in the industrial user files.

Please acknowledge the receipt of this letter no later than August 15, 2013.

Ohio EPA recognizes the continuing commitment demonstrated by Chairman and Council, Washington Court House Pretreatment and WWTP 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,



Greg Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure: City of Washington Court House PRI Forms

c: Ryan Laake, DSW/CO



Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

| | | | |
|--|----------------|------------------------------|---------------------------------|
| FACILITY NAME City of Washington Court House WWTP | | PERMIT NUMBER 4PD00002*OD | FACILITY NUMBER OH0028002 |
| INSPECTION TYPE R | INSPECTOR S | FACILITY TYPE 1 | DATE CONDUCTED June 24, 2013 |

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
 Washington C.H. WWTP
 1210 South Elm Street
 Washington C.H. OH 43160

MAILING ADDRESS OF FACILITY
 Chairman and Council
 City of Washington C.H.
 105 North Street
 Washington C.H., OH 43160

CONTACT (NAME/TITLE/PHONE)
 John Woodrow, City of Washington C.H. WWTP, Pretreatment Coordinator
 740.636.2383

FACILITY EVALUATION

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

| | | | |
|---|---|--|--|
| S | Pretreatment Reconnaissance Inspection (PRI) | | |
| | Report attached | | |
| | Inspection period; March 1, 2011 to June 24, 2013 | | |

| | | |
|---|--|-----------------|
| Names(s) and Signature(s) of Inspector(s) Gregory L. Sanders | Ohio EPA Division of Surface Water Central District Office 614.728.3851 | Date 6-26-13 |
| Signature of Reviewer Jeff Bohne, Supervisor | Ohio EPA Division of Surface Water Central District Office 614.728.3843 | Date 6-26-13 |

Form 3560

WENDB AND RNC WORKSHEET

Pretreatment Reconnaissance Inspection Checklist

| | |
|---|---------------------------------|
| FACILITY INFORMATION | |
| Name City of Washington Court House WWTP | |
| OH Number OH0028002 | NPDES Number 4PD00002*OD |
| Date of Inspection June 24, 2013 | |

I. WENDB DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

| | Data | Checklist Reference | PCS Code |
|---|------|---------------------|----------|
| Number of SIUs | 3 | 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 | 2 | 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 |
| 0 | 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 | | |