



PRETREATMENT INSPECTION REPORT

FACILITY NAME  
**City of Sidney**

PERMIT NUMBER  
**1PD00009\*PD**

FACILITY NUMBER  
**OH0027421**

INSPECTION TYPE  
**P**

INSPECTOR  
**S**

FACILITY TYPE  
**1**

DATE CONDUCTED  
**April 10, 2013**

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**City of Sidney WWTP  
1091 Childrens Home Road  
Sidney, OH 45365**

MAILING ADDRESS OF FACILITY

**Mayor and Council  
City of Sidney  
201 West Poplar Street  
Sidney, OH 45365**

CONTACT (NAME/TITLE/PHONE/E-MAIL)

**Mr. Rob Guisinger / Industrial Pretreatment Coordinator / (937) 498-8120 / RGuisinger@sidneyoh.com**

FACILITY EVALUATION

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

*	Pretreatment


\* See inspection letter

Names(s) and Signature(s) of Inspector(s)  <b>Matt Walbridge</b>	Agency / Office / Telephone <b>Ohio EPA / SWDO / (937) 285-6095</b>	Date <b>5-16-13</b>
Signature of Reviewer  <b>Margy G. Burt</b>	Ohio EPA / SWDO	Date <b>5/17/13</b>



## 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

# 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>Mayor and Council City of Sidney 201 West Poplar Sidney, OH 45365</i>	<i>April 10, 2013</i>

INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number
<i>Matt Walbridge</i>	<i>Environmental Specialist 2 / Ohio EPA / SWDO</i>	<i>(937) 285-6095</i>

CA REPRESENTATIVE(S)		
Name	Title/Affiliation	Telephone Number
<i>Mr. Rob Guisinger *</i>	<i>Pretreatment Coordinator / City of Sidney WWTP</i>	<i>(937) 498-8120</i>
<i>Brian Clark</i>	<i>Assistant Superintendent / City of Sidney WWTP</i>	<i>bclark@sidneyoh.com</i>

\*Identified program contact

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>Honda of America – Anna Engine Plant 12500 Meranda Rd Anna, OH 45302</i>	Type of industry  <i>Manufacture automotive engines. Casting and machining are the major operations</i>	
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> Categorical SIU - 40 CFR <u>433.17, 464.16(c)</u> , Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) <i>~250,000</i>	Average process flow (gpd) <i>~150,000</i>
	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

FILE <u>2</u> Industry name and address  <i>MaMa Rosa's 1910 Fair Road Sidney, OH 45365</i>	Type of industry  <i>Bake, assemble, freeze and package pizzas, dough balls and crusts.</i>	
IU CLASSIFICATION BY CA: <input type="checkbox"/> Categorical SIU - 40 CFR _____, _____, Category(ies) _____ <input checked="" type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU	Average total flow (gpd) <i>ND</i>	Average process flow (gpd) <i>~40,000 plus periodic batch sanitization</i>
	Industry visited during PCI? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

**COMPLIANCE STATUS**

SNC (period: \_\_\_\_\_)  Noncompliance/corrected  Noncompliance/continuing  In compliance

EXPLANATION: *pH mostly. A few hexane extractable material violations*

Comments

**IU IDENTIFICATION (Continued)**

FILE ____ Industry name and address		Type of industry	
IU CLASSIFICATION BY CA: <input type="checkbox"/> Categorical SIU - 40 CFR _____, _____, Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU		Average total flow (gpd)	Average process flow (gpd)
		Industry visited during PCI?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<b>COMPLIANCE STATUS</b>			
<input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance			
EXPLANATION:			
Comments			

FILE ____ Industry name and address		Type of industry	
IU CLASSIFICATION BY CA: <input type="checkbox"/> Categorical SIU - 40 CFR _____, _____, Category(ies) _____ <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non SIU		Average total flow (gpd)	Average process flow (gpd)
		Industry visited during PCI?    Yes <input type="checkbox"/> No <input type="checkbox"/>	
<b>COMPLIANCE STATUS</b>			
<input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing <input type="checkbox"/> In compliance			
EXPLANATION:			
Comments			

**IU IDENTIFICATION (Continued)**

FILE \_\_\_\_ Industry name and address

Type of industry

**IU CLASSIFICATION BY CA:**

Categorical SIU - 40 CFR \_\_\_\_\_, \_\_\_\_\_,  
Category(ies) \_\_\_\_\_

Average total flow (gpd)

Average process flow (gpd)

Non-categorical SIU

Non SIU

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) \_\_\_\_\_

Average total flow (gpd)

Average process flow (gpd)

Non-categorical SIU

Non SIU

Industry visited during PCI?

Yes

No

**COMPLIANCE STATUS**

SNC (period: \_\_\_\_\_)  Noncompliance/corrected  Noncompliance/continuing  In compliance

**EXPLANATION:**

Comments

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

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

- 1. Does not reflect the new local limits that were adopted when Ohio EPA did not act on submittal of local limits technical justification within 45 days. If anything, these limits should have been incorporated into all IU permits at the same time instead of as the permits come up for renewal.*
- 2. Renewed on January 15, 2013*
- 3. Not sure how things like pizza sauce spills and equipment descaling with vinegar is viewed.*

**SECTION I: IU FILE EVALUATION (Continued)**

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

Comments:

- 1. Will need to verify operating levels and processes in light of the recent expansions.*
- 2. Separate outfall.*
- 3. New local limits are applied.*

## SECTION I: IU FILE EVALUATION (Continued)

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

**Comments:**

1. *Good chain of custody sheet. The portion of the form indicating whether time or flow-proportional sampling was performed is not being completed. I recommend that sampler pacing information be included. Grab sample date and time needs to be recorded – especially when both composite and grab samples are included on the form. pH sample date and time and analysis time should be recorded.*
2. *Nice documentation.*
3. *Need date and time for pH. Need flow data. It is unclear why flow-proportional sampling is not being performed for annual monitoring of local limit parameters.*
4. *Look at potential for product spills and off-spec product dumps. Potential pollutant load from ammonia chillers?*

**SECTION I: IU FILE EVALUATION (Continued)**

File 1	File 2	File	File	File	IU FILE REVIEW	Reg. Cite
<b>E. CA ENFORCEMENT ACTIVITIES</b>						
NA	x				1. Response to violations	403.8(f)(2)(vi)
NA	x				a. Discharge violations	
NA	NA				b. Monitoring/reporting violations	
NA	NA				c. Compliance schedule violations	
NA <sup>1</sup>					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)
					4. Adherence to approved ERP	403.8(f)(5)
NA	2				a. Proper response to violations	
NA	x				b. Escalation of enforcement	

Comments:

1. *Didn't escalate to that level.*
2. *NOVs and monetary penalties.*

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

1. *Flow records are being e-mailed separately from the regular self-monitoring report.*
2. *Not sure why there are including the TTO certification statement.*
3. *Not required because the city is sampling monthly.*
4. *Spills/dumps/cleanings wastewater?*

**SECTION I: IU FILE EVALUATION (Continued)**

File <i>1</i>	File <i>2</i>	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>G. OTHER</b>	

Comments:

*(This area is intentionally left blank for handwritten or typed comments.)*

SECTION I COMPLETED BY: <i>Matt Walbridge</i>	DATE: <i>April 10, 2013</i>
TITLE: <i>Environmental Specialist</i>	TELEPHONE: <i>(937) 285-6095</i>



## 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
<b>x</b>	

If yes, discuss.

*Local limits were submitted to Ohio EPA's Central Office in February 2012 – Sidney has not received any response.*

*SUO amendment was passed in December 2012 which contained new prohibited discharges that includes any discharge containing molybdenum additive chemicals*

2. Have you identified any needed changes?

Yes	No
<b>x</b>	

If yes, describe.

*1999 Enforcement Response Plan to be updated to include increased penalties and remove ambiguities.*

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

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

*Planning Director takes the lead. She disseminates information to city departments who then meet with staff. This is all done 'as-needed'.*

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)

*Utility billing prepares list of water usage.*

*Physical expansions trigger a site plan review.*

*Newspaper and 'word of mouth' are still effective.*

*Permitted non-SIUs are inspected every three to five years.*

*In January 2012 the city started a 'water usage tracking sheet that ranks and allows for identification of potential changes in operations at IUs.*



**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?	<b>Yes</b>	<b>No</b>
	✓	

*It's called a Data Disclosure Form.*

## 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.

*Every year during inspections.*

*It's a checklist item on the annual IU inspection form.*

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

<i>All</i>
------------

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

*None.*

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

*NA*

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

*NA*

### E. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage, of discharging SIUs were: [403.8(f)(2)(v)][WENDB~NOIN][RNC'II]

(Define the 12 month period 7-1-11 to 6-30-12)

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

<i>0</i>	<i>0 %</i>
----------	------------

b. Not sampled at least once (all parameters)

<i>0</i>	<i>0 %</i>
----------	------------

c. Not inspected at least once

<i>0</i>	<i>0 %</i>
----------	------------

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]

<i>0</i>
----------

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
	x

Explain if appropriate:

*d. On the annual report, they mistook this to be an appeal of an NOV.*

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	
	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)]	Yes	No
		<b>x</b>
G. GENERAL OBSERVATIONS/INFORMATION ENFORCEMENT		
Have you had any problems (general or specific) implementing your approved program?	Yes	No
		<b>x</b>
Additional Comments/Observations/Information:		

SECTION I COMPLETED BY: <i>Matt Walbridge</i>	DATE: <i>April 10, 2013</i>
TITLE: <i>Environmental Specialist 2</i>	TELEPHONE: <i>(937) 285-6095</i>