Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

August 2, 2021

Transmitted Electronically

Mr. Michael Caprella, Director Utilities Department City of Lima 50 Town Square Lima, Ohio 45801-4900	**Re:**	Lima WWTP Inspection NPDES Allen County 2PE00000

Subject: Comprehensive Desktop Review - Pretreatment

Dear Mr. Caprella:

On June 30, 2021, I conducted a comprehensive desktop review of the City of Lima's approved pretreatment program. Ms. Emily Kerber and Ms. Kim Furry were present to provide technical information.

The purpose of the inspection was to evaluate compliance with the terms and conditions of the pretreatment requirements your National Pollutant Discharge Elimination System (NPDES) permit. The review included a review of pretreatment reports and completion of the attached checklist.

Findings:

1. The City of Lima submitted a local limit study in February 2019 to Ohio EPA for approval. The study has not yet been approved.

2. The City currently has eight industrial users under permits. The pretreatment annual report lists 12 Significant industrial users, 11 categorical industrial users and four significant non-categorical industrial users.

3. The City is investigating surfactants that are discharged to the City's Wastewater Treatment Plant (WWTP) to determine how they influence plant operations.

Recommendations:

The recommendation(s) set out below are not Orders. The recommendations are offered by Ohio EPA in an effort to provide compliance assistance to your facility.

1. Once the local limit study has been approved, the sewer use ordinance can be modified to include the limits. US EPA has a model of a pretreatment sewer ordinance that is very comprehensive and addresses all the current regulations.

It can be found here:
https://epa.ohio.gov/portals/35/pretreatment/PretreatmentModelSUO.pdf.

2. Conduct an inventory of industries that discharge to the City of Lima's WWTP to determine if they are required to be permitted as specified in Ohio Administrative Code (OAC) 3745-3-03(C)(1)(c).

3. Identify any industrial users that are non-significant categorical users and are located upstream of a combined sewer overflow (CSO) to determine if these industries are required to be permitted.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 419-373-3006 or e-mail at Peggy.Christie@epa.ohio.gov.

Sincerely,

Peggy B. Christie

Peggy B. Christie
Division of Surface Water

/jlm

ec: Ms. Emily Kerber, Utility Operations Manager, City of Lima
Ms. Kim Furry, WWTP Supervisor, City of Lima
Inspection Tracking

PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME	PERMIT NUMBER	FACILITY NUMBER
City of Lima WWTP	***2PE00000***	***OH0026069***

INSPECTION TYPE	INSPECTOR	FACILITY TYPE	DATE CONDUCTED
PCI	***Peggy Christie***	***1***	***06/30/2021***

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY
City of Lima WWTP
1200 Fort Amanda Road
Lima, OH 45804

MAILING ADDRESS OF FACILITY
City of Lima WWTP
50 Town Square
Lima, OH 45801

CONTACT (NAME/TITLE/PHONE)
Ms. Kim R. Furry, Lima WWTP Supervisor, kim.furry@cityhall.lima.oh.us
Ms. Emily C. Kerber, Operations Manager, emily.kerber@cityhall.lima.oh.us

FACILITY EVALUATION

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

* See inspection letter

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
Peggy B. Christie Peggy B. Christie	Ohio EPA/NWDO/419-373-3006	7/15/2021
Signature of Reviewer Thomas Poffenbarger Thomas Poffenbarger, P.E.	Ohio EPA/NWDO/419-373-3000	Date 7/28/21

PRETREATMENT AUDIT CHECKLIST

PRETREATMENT COMPLIANCE INSPECTION CHECKLIST CONTENTS

Control Authority (CA) name and address	Date(s) of PCI
City of Lima	***06/30/2021***

INSPECTOR(S)

Name	**Title/Affiliation**	**Telephone Number**
Peggy B. Christie	Environmental Engineer II/Ohio EPA	419-272-3006

CA REPRESENTATIVE(S)

Name	**Title/Affiliation**	**Telephone Number**
Ms. Kim Furry	Lima WWTP Supervisor/City of Lima	419-221-5198
Ms. Emily Kerber	Operations Manager/City of Lima	419-998-5539

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	Type of industry	
US Army Joint Systems Manufacturing Center ***1155 Buckeye Road*** ***Lima, OH 45804***	***Assembly and retrofit of vehicles used by the armed services***	
IU CLASSIFICATION BY CA: ☒ Categorical SIU - 40 CFR ***433**** Category(ies) ________ ☐ Non-categorical SIU ☐ Non SIU	Average total flow (gpd) 36,840	Average process flow (gpd) 26,650
	Industry visited during PCI? Yes ☐ No ☒	

COMPLIANCE STATUS

☐ SNC (period: ________) ☐ Noncompliance/corrected ☐ Noncompliance/continuing ☒ In compliance.

EXPLANATION:

Comments: *Categorical wastewater at US Army Joint Systems Manufacturing Center is currently hauled off site. The facility wishes to keep their permit, should they decide to discharge this wastewater in the future.

Industry Name					
US Army Joint Systems Manufacturing					**INSTRUCTIONS:** Evaluate the contents of selected IU files; emphasis should be placed on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Comments should be provided in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, enter an "**x**" to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.

File ***1***	**File**	**File**	**File**	**File**	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
X					1. Control mechanism application form	
X					2. Proper IU categorization (sig cat, sig non-cat, non-sig)	
X					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
-					4. Control mechanism contents	403.8(f)(1)(iii)
X					a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(A)
X					b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)
-					c. Applicable effluent limits	403.8(f)(1)(iii)(C)
-					• Application of applicable categorical standards	403.8(f)(1)(ii)
1.					-Classification by category/subcategory	
ND2.					-Classification as new/existing source	
3					-Application of limits for all categorical pollutants	
4.					-Application of TTO or TOMP alternative	
N/A					-Calculation and application of production-based standards	403.6
N/A					-Calculation and application of CWF or FWA	403.6(d)&(e)
ND					• Application of applicable local limits	
ND					• Application of most stringent limit	403.8(f)(1)(ii)

Comments: Note: the permit renewal application for Joint Systems Manufacturing says, “We currently do not generate any regulated wastewater flows. We are classified as a zero-discharge metal finisher (40CFR433) and would like to keep that designation in our permit since the possibility exists that the metal finishing process may come back sometime in the future.” Therefore, the notes below are recommendations not violations/deficiencies. Part V.C of permit indicates why categorical limits are not applied.

1. Permit application does not ask specifically if the facility is subject to Federal Pretreatment Guidelines, and if so which section of 40 CFR applies. For this facility, the facility provided this information in the “Briefly describe processes that generate regulated wastewater” section of the renewal application.
2. The renewal application does not ask if the wastewater is a new source or an existing source. This question may not be applicable in this case as this is a renewal application. Applications for a new discharge permit may request this information.
3. Categorical limits are not applied. Those limits that are applied are more stringent than the categorical standard. No limits are included for cadmium, silver and cyanide. There is no monitoring for TTO.
4. If TTO monitoring is required, and the language to choose TOMP in lieu of monitoring would need to be included in this permit..

40 CFR 433 does not require production-based limits, so loadings do not apply.

The City of Lima submitted a Local Limit Study in February 2019 to Ohio EPA, and they have not yet received approval for these limits.

File *1*	**File**	**File**	**File**	**File**	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	
-					d. IU self-monitoring requirements	403.8(f)(1)(iii)(D)
X					• Identification of pollutants to be monitored	
X					• Sampling frequency	
X					• Sampling locations/discharge points defined	
1.					• Reporting requirements	
X					• Appropriate sample types (grab or composite)	
X					• Record keeping requirements	403.12(o)
X					e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
X					f. Compliance schedules/progress reports (if applicable)	
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	403.8(f)(1)(iii)(D)
X					k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)

Comments

1. Permit states, "If specifically required by the Director, the permittee shall submit a PCR [Periodic Compliance Reports] to the Director every six months, ..." This is specific to this permit, because they are a zero-discharging facility. Other permits do not use, "if specifically required by the Director" language.

File *1*	File	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	

File *1*	File	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					B. CA COMPLIANCE MONITORING	
-					1. Inspection	
ND					a. Inspection at frequency specified in approved program	403.8
X					b. Documentation of inspection activities (inspection checklist)	403.8(f)(2)(vi)
X					c. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
-					2. Sampling	
X					a. Sampling at frequency specified in approved program	403.8
X					b. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
X					c. Analysis for all regulated parameters	403.12(g)(1)
X					d. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)

Comments:

File *1*	**File**	**File**	**File**	**File**	SECTION I: IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES	
					1. Identification of and response to violations	403.8(f)(2)(vi)
N/A					a. Discharge violations	
N/A					• IU self-monitoring	
N/A					• CA compliance monitoring	
N/A					b. Monitoring/reporting violations	
N/A					• IU self-monitoring	
N/A					-Reporting (e.g., frequency, content, signatory requirements)	OAC 3745-3-06(F)
N/A					-Sampling (e.g., frequency, pollutants)	
N/A					-TTO requirements met	
N/A					• Notification	
N/A					-Notified CA of significant change in operation or discharge	403.12(j)
N/A					-Immediate notification of slug load discharge or accidental spill	OAC 3745-3-05
N/A					-24 hour notification after becoming aware of discharge violations	403.12(g)(2)
N/A					-Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
N/A					• Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
N/A					• Met compliance schedule milestones by required dates	403.12
N/A					c. Compliance schedule violations	
N/A					• Start-up/final compliance	
N/A					• Interim dates	

Comments

Per the inspection report, dated 5/19/2021, USJSMC is in compliance with their permit.

File *1*	File	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES (Continued)	
N/A					2. Proper calculation of SNC	403.8(f)(2)(vii)
N/A					a. Chronic	
N/A					b. TRC	
N/A					c. Pass through/interference	
N/A					d. Spill/slug load	
N/A					e. Reporting	
N/A					f. Compliance schedule	
N/A					g. Other violations (specify)	
N/A					3. Adherence to approved ERP	
N/A					a. Proper response to violation	403.8(f)(5)
N/A					b. Escalation of enforcement	403.8(f)(5)
N/A					4. Return to compliance	
N/A					a. Within 90 days	
N/A					b. Within time specified	
N/A					c. Through compliance schedule	
N/A					5. Publication for SNC	403.8(f)(2)(vii)
N/A					D. OTHER	

Comments

SECTION I COMPLETED BY:	Peggy Christie	DATE: 07/07/2021
TITLE:	Environmental Engineer	TELEPHONE: 419-373-3006

SECTION II: INTERVIEW

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATIONS [403.18]

1. a. Describe any changes pending or completed made to the pretreatment program since the last inspection. (e.g., legal authority, local limits, multi-jurisdictional agreements, ERP, sewer use ordinance, control mechanism, etc.)

Local limit study submitted in 2018, but not approved yet. The City is planning to remove the local (loading) limits that are currently in the Ordinance. The ordinance can only be changed October according to their ordinance.

b. Have you identified any needed changes in your program?

If yes, describe.

Yes	No
	X

B. LEGAL AUTHORITY [403.8(f)(1)]

1. Are there any contributing jurisdictions discharging wastewater to the POTW?

   If yes, explain how these multi-jurisdictional agreements have been incorporated into your approved program.

Yes	No
X	

Allen County has sewers that discharge to the City of Lima
There are agreements in place for each area that the county discharges the City.

2. Do you experience difficulty in implementing your legal authority [i.e., SUO, multi-jurisdictional agreement (e.g, permit challenged, entry refused, penalty appealed)]?

   If yes, explain.

Yes	No
	X

C. IU CHARACTERIZATION [403.8(f)(2)(I)&(ii)]

1. Have you changed how SIUs are classified?

Investigating the definition of a non-significant categorical user in relation to locations upstream of a CSO.

2. a. How do you identify and classify new IUs? (i.e., Industrial Waste Survey)

Industry has to get a sewer permit through the City. If they determine that they are an SIU, they will complete a BMR.

b. How and when do you identify changes in wastewater discharges at existing IUs (including contributing jurisdictions)?

The permit requires SIU to inform the City. Each industry is different. City does sample all industries at least once a year at a minimum.

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

1. a. How many and what percent of the total SIUs are not covered by an existing, unexpired permit, or other individual control mechanism? [WENDB-NOCM] [RNC-II]

Number	Percent
15	65

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

If any, explain. In the process of renewing permit this year.

Currently 8 industries are under permit. According to the annual pretreatment report, the city has identified 12 SIUs, 11 CIUs and 4 non-significant categorical users. They plan on surveying all industries to determine if other industries need to be under permit. Hospitals and some industries that are not under permit, are still monitored. Hospitals are sampled quarterly. Pepsi (high volume) and Bob Evens (high strength and high volume), Keystone (low use), are monitored monthly. They will also be evaluating non-significant categorical industries that are located upstream of CSOs.

2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW?

Yes	No
	X

b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss: N/A – The City does not allow RCRA or CERCLA wastewater o discharge to City.

D. CONTROL MECHANISM EVALUATION (Continued)

	Yes	No
3. a. Do you accept any waste by truck, rail, or dedicated pipe?	X	
b. Is any of the waste hazardous as defined by RCRA?		X

If a. or b. above is yes, explain.

Septage only

c. Describe your program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)]

The WWTP has a septage receiving area. Entities wishing to discharge at the septage receiving area will swipe card, sign in, WWTP will review manifest, weigh in/weigh out and collect a sample. Sample will be held and only analyzed only if there is an upset at the plant to determine if wastewater was the cause.

4. What limits (categorical, local, other) do you apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

pH is tested (6 to 11). Only residential waste is hauled to the plant. Only location that they receive hauled waste is at the septage receiving station at the plant.

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. How do you keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

Email notification from EPA. Member of NACWA and AOLMWA, which have forums for pretreatment. They send updates whenever there is a question or rule update regarding pretreatment.

Local limits evaluation: [403.8(f)(4); 122.21(j)]	Yes	No
2. Have you identified any pollutants of concern beyond those in your local limits?	X	

(e.g., conventionals, organics, etc.)

Surfactants can be an issue. Bis 2 is also a concern now that the WWTP is required to monitor for it.

If yes, how has this been addressed?

Working on it to determine the best way to address surfactants discharged to plant.

3. What problems, if any, were raised during local limit implementation or reissuance of industrial permits? How were these problems addressed?

N/A

F. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)][RNC-II]
   (Define the 12 month period ***6/20*** to ***6/21***.)

a. Not sampled or not inspected at least once [WENDB-NOIN]	0	***0%***
b. Not sampled at least once	0	***0%***
c. Not inspected at least once (all parameters)?	0	***0%***
d. In SNC with self monitoring and not inspected or sampled?	0	***0%***

If any, explain. Indicate how percentage was determined (e.g. actual, estimated).

2. Who performs your compliance sampling and analysis?

	Sampling	Analysis
• Metals	***City/Alloway***	***Alloway***
• Cyanide	***City/Alloway***	***Alloway***
• Organics	***City/Alloway***	***Alloway***
• Conventionals	***City/Alloway***	***City of Lima***
• Other (specify)		

Industrial monitoring tech may be getting a new position. If that happens, all will be contracted to Alloway.

3. What QA/QC techniques do you use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vi)]

In house the Lima WWTP lab does spikes/duplicates. Alloway does all (splits/blanks, spikes). Both participate in DMRQA

4. Discuss any problems encountered in identification of sample location, collection, and analysis.

Superior Forge and Steel - determined there are two separate points/manholes where they discharge to the City. One location is the pond/process water discharge and the other is restrooms. They were not sampling where the process (pond) discharges. Now they are sampling both locations.

5. a. How and when do you evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

Annually in their inspections, this is also questioned/evaluated and at permit renewal.

b. How many SIUs were evaluated for the need to develop slug discharge control plans in the last 2 years?

All

G. ENFORCEMENT

1. Have you experienced any of the following since the last inspection?

	Yes	No	Explain
• Interference	X		Fire suppression wastewater hauled from a fire at Kalmbach Feeds caused plant upset at the Lima WWTP.
• Pass through		X	Exploring surfactant issues
• Fire or Explosions		X	
• Corrosive structural damage		X	
• Flow obstructions	X		Pipe plugged following a relining project
• Excessive flow rates		X	
• Excessive pollutant concentrations		X	
• Heat problems		X	
• Interference due to O & G	X		Used to have issues but stopped accepting hauled grease.
• Toxic fumes		X	
• Illicit dumping of hauled wastes		X	
• Worker health and safety concerns		X	
• Other (specify)		X	

a. If yes, describe the control authority's response:

Now only accept domestic hauled wastewater.

	Yes	No
b. Were you made aware of any hazardous waste discharges to the POTW? If yes, explain.		X

	Yes	No
2. a. Do you use compliance schedules? [403.8(f)(1)(iv)(A)]		X
b. If yes, are they appropriate? Provide examples.		X

The city has the ability to add a compliance schedule. They are actively investigating this option with one industry.

G. ENFORCEMENT (Continued)

3. ERP implementation: [403.8(f)(5)]

a. Date of last modification: Not recently modified in ordinance but it is included in all permits.

b. Problems with implementation:

No

c. Is the ERP effective and does it lead to compliance in a timely manner? Provide examples if any are available.

Yes. NOVs are issued for limit violation, and facility will resample as required in permit.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How are requests for confidentiality handled?[403.14]

Have not received any requests for confidentiality.

2. How are requests by the public to review pretreatment files handled (including confidential information)?

They haven't had any requests.

3. a. Describe your data management system regarding pretreatment implementation and enforcement activities. (e.g., computerization, file system, etc.)

File system.

b. How long are records maintained? [403.12(o)]

At least 5 years.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

4. How do you ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

All council meetings are public and council approves the SUO. Public can always request more information or public meeting. This has not been an issue.

5. Explain any community issues impacting the pretreatment program.(I. e., economics, politics, new development, etc.)

None

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sampling and analysis, enforcement, and administration]. When fully staffed, 5-7.

4-5

2. Do you have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

   If no, explain.

Yes	No
X	

3. Discuss any problems in program implementation which appear to be related to inadequate resources. (i.e., finances, equipment, personnel, training, etc.)

None

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. Have you compiled historical data concerning influent, effluent, and sludge sampling for the POTW? If yes, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

   Discuss on pollutant-by-pollutant basis.

The City does have historical data compiled but have not done any trending. They will be investigating surfactants.

2. Have you investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes	No
	X

   If yes, what was found?

The City did some sampling for hex chrome, mercury as part of NPDES permit. They haven't found specific causes.

3. a. Have you implement any kind of public education program?

   b. Are there any plans to initiate a program to educate users about pollution prevention?

	Yes	No
a.		X
b.		X

Not any recent public education items. Did one in 2009.

Explain. Not a current priority.

4. What efforts have been taken to incorporate pollution prevention into the pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

Community clean up and household hazardous waste programs are implemented through other departments in the City (not utilities)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

5. Do you have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?	Yes	No
		X

Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION II COMPLETED BY:	Peggy Christie	DATE: 6/30/2021
TITLE:	Environmental Engineer	TELEPHONE: 419-373-3006

SECTION III: EVALUATION AND SUMMARY

INSTRUCTIONS: Based on information and data evaluated, summarize the findings of the audit for each program element shown below. Identify all problems or deficiencies based on the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
• Status of program modifications (Ref. 403.18 /Checklist II.A.1)	Yes	None
When local limits are approved, these should be incorporated in the SUO.		
B. LEGAL AUTHORITY		
• Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)	None	None
• Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)	None	None

Description	Recommended Action	Required Action
C. IU CHARACTERIZATION		
• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)	Yes	None
Investigate the population of IUs which would fall under the definition of Non-Significant Categorical User and are located upstream of CSOs		
D. CONTROL MECHANISM		
• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/ Checklist II.D.1)		Yes
Currently only 8 industrial users are under permit. The annual pretreatment report lists 12 SIU, 11 CIU and 4 significant non-categorical users. Reference Ohio Administrative Code 3745-3-03(C)(1)(c), ". In the case of industrial users identified as significant under paragraph (S) of rule 3745-3-01 of the Administrative Code, this control shall be achieved through individual or general control mechanisms issued to each such user or group of users."		
Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)	None	None
None		
Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&4)	None	None
None		

Description	Recommended Action	Required Action
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
• Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&(iii); 403.5 /Checklist I.A)	Yes	None
Identify and permit IU's that are non-significant categorical industrial users and are located upstream of CSOs.		
• Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3)	None	None
None. Waiting for approval of local limits study.		
F. COMPLIANCE MONITORING		
• Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1)	None	None
None		
• Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1)	None	None
None		
• Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4)	None	None
None		

Description	Recommended Action	Required Action
• Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) None	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	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	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	None

Description	Recommended Action	Required Action
G. ENFORCEMENT		
• 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	None
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2) None	None	None
• Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) Not evaluated		
• 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	None

Description	Recommended Action	Required Action
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
• Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H)	None	None
I. RESOURCES		
• Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)	None	None
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
• Understanding of pollutants from all sources (Checklist II.J.1&2)	None	None

Description	Recommended Action	Required Action
• Documentation of environmental improvements/effectiveness (Checklist II.J.1)	Yes	None
Continue to investigate the causes of surfactants discharged to the City.		
• Integration of pollution prevention (Checklist II.J.3,4&5)	None	None

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION III COMPLETED BY:	Peggy Christie	DATE:	07/13/2021
TITLE:	Environmental Engineer	TELEPHONE:	419-373-3006

WENDB AND RNC WORKSHEET

FACILITY INFORMATION	
Name: City of Lima WWTP	Date of Inspection: 6/30/2021
OH Number: OH0026069	NPDES Number: 2PE00000

I. WENDB DATA ENTRY WORKSHEET

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

	Data	Checklist Reference PCI	Checklist Reference AUDIT	PCS Code
Number of SIUs	***12***	Annual	Annual	SIUS
Number of CIUs	***11***	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	***15***	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	Reference 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			