August 7, 2023

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: Pretreatment Audit Inspection

Dear Mr. Caprella:

On June 28, 2023, I conducted an audit of the City of Lima's approved pretreatment program. A follow up TEAMS meeting was conducted on July 5, 2023, to complete the interview portion of the audit. Ms. Kim Furry, Mr. Eric Bontrager, and Ms. Amy Straley 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 audit included a review of pretreatment reports, records, permits, and completion of the attached checklist.

The audit also included site visits to Randall Bearings and Pepsi.

Findings:

1. The City of Lima submitted a local limit study in February 2019 to Ohio EPA for approval. The study was approved on August 10, 2021.

2. The City contracted with Geosyntec to perform a comprehensive evaluation of the pretreatment program. The consultant presented a report with recommendations to the city on April 5, 2023. The city is working on implementing the recommendations.

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. We recommend that the City continues to implement the recommendations presented in the Geosyntec report, including permitting the significant industrial users that were identified in report.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (419) 373-3006 or email at peggy.christie@epa.ohio.gov.

Sincerely,

Peggy B. Christie
Division of Surface Water

/cle

ec: Eric Bontrager, Environmental Compliance Manager, City of Lima
Kim Furry, WWTP Supervisor, City of Lima
Amy Straley, Industrial Compliance Manager

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Control Authority (CA) name and address	Date(s) of audit
City of Lima WWTP ***1200 Fort Amanda Road*** ***Lima, OH 45804***	***June 28, 2023***

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Lima WWTP	***2PE00000***	***July 1, 2023***	***06/30/2028***	***Yes***

AUDITOR(S)

Name	Title/Affiliation	Telephone Number	Email Address
Peggy Christie	***Environmental Engineer/OEPA***	***419-373-3006***	***Peggy.Christie@EPA.ohio.gov***

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
Kim Furry	***WWTP Supervisor/Lima***	***(419) 221-5198***	***kim.furry@cityhall.lima.oh.us***
Eric Bontrager	***Enviro Compliance Manger***	***(419) 221-5136***	***eric.bontrager@cityhall.lima.oh.us***
Amy Straley	***Industrial Monitoring &Lab Chief***	***(419) 221-5196***	***amy.staley@cityhall.lima.oh.us***

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	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
ICIS	Integrated Compliance Information System
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
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
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
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.

2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.

3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.

4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could 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 might be required in some cases.

Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

Yes	No
	X

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?

Yes	No
X	

If yes, describe. The city hired Geosyntec to review the pretreatment program. The city is working on implementing the recommendations in the report.
Three facilities are now under permit, Keystone, Pepsi and Bob Evans are now under pretreatment permits.

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?

Yes	No
	X

If yes, describe.

The current SUO requires that changes to the SUO can only be made in September. In order to meet that date, the Law Department needs the recommended changes in June to review before putting before City Council.

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

	Yes	No
Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]	X	
Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]	X	
Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]	X	
Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]	X	
SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]	X	
Record-keeping requirements for BMPs. [40 CFR 403.12(o)]	X	
Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]	X	
Modifications to the sampling requirements. [40 CFR 403.12(g)]	X	
Requirement to report all monitoring results. [40 CFR 403.12(g)]	X	

If not, when?

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?	Yes	No
		X

If yes, check which ones.

	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

2. a. Are there any planned changes to the POTW's treatment plant(s)?	Yes	No
The city is exploring making changes to the biosolids program.		X

If yes, describe.

b. Are these changes to the treatment plant(s) due to pretreatment issues?	Yes	No
		X

If yes, what were the issues?

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

1. a. Are there any contributing jurisdictions discharging wastewater to the POTW?	Yes	No
	X	

If yes, complete questions b–e.

b. List the contributing jurisdictions.

There are agreements in place with Allen County, but not that address pretreatment responsibilities

Allen County does not have a pretreatment program, so any industrial facilities which fall under pretreatment regulations discharging to Allen County sewers and treated at Lima WWTP are permitted by Lima.

c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?	Yes	No
		X

d. Is the CA or the contributing jurisdiction responsible for the following:

	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS	X	
Notifying IUs of requirements	X	
Issuance of control mechanisms	X	
Receiving and reviewing IU reports	X	
Conducting inspections	X	
Conducting compliance monitoring	X	
Enforcement of Pretreatment Standards and Requirements	X	

SECTION I: DATA REVIEW (CONTINUED)

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

	Yes	No
e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?		***X***

If yes, explain.

	Yes	No
2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?	***X***	
b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?	***N/A***	
c. Did the CA update its procedures and ERP to implement the changes in its SUO?	***X***	

Explain

	Yes	No
3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?		***X***

If yes, explain.

SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?) Same as the Federal definition

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU?*
N/A

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?
N/A

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?
Most recently, the City hired a consultant to conduct a city wide survey of all industries.
Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?
New industries will complete a baseline monitoring report. The IWS has not been updated in recent years.

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)? Through inspections and sampling

SECTION I: DATA REVIEW (CONTINUED)

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

4. How many IUs are identified by the CA in each of the following groups?

a.	***15***		SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
		10	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
		N/A	Middle-tier CIUs** (specify below)
		5	Noncategorical SIUs
b.	***1***		Other regulated nonsignificant IUs (specify)
			Noncategorical nonsignificant IUs
		0	NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
		1	Zero-discharging CIUs** (specify below)
c.	***16****		TOTAL

*This number is prior to the Geosyntek report.

**** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs: Randall Bearings

List of Middle-Tier CIUs: N/A

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? N/A

List of SIUs with general control mechanisms: N/A

SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]	***2***	***10***	%
b. Has the CA implemented any general control mechanisms? N/A			
c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism?	***N/A***		
List the types of SIUs covered under a general control mechanism:			
d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]	***0***		
If any, explain.			
2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?	***N***		
b. How are control mechanisms (specifically limits) developed for these facilities? N/A			
Discuss			

	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?	***X***	
b. Is any of the waste hazardous as defined by RCRA?		***X***
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		***X***

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

Only septage is received. Every load is sampled and weighed.

EOLM discharges via a dedicated line. EOLM is sampled quarterly.

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA 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)]

Only domestic septage is accepted.

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

The city is a member of AOMWA - Association of Ohio Metropolitan Wastewater Agencies which monitors upcoming regulations that could impact WWTPs.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set?

Certain industries are allocated a set amount of loading for chromium, copper, zinc, and nickel. Arsenic, Cadmium, cyanide dissolved hexavalent chromium, lead, molybdenum, selenium and silver are monitored. Mercury is monitored as part of the City's Mercury PMP.

b. How were these pollutants selected?

Through the full local limit survey.

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

NPDES

d. Which allocation method(s) were used?

Maximum allowable influent loading, split a percentage of the domestic, and industries with a buffer.

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

Daily maximum load.

f. When was the CA's last local limits evaluation? What was the approval date?

Submitted February 1, 2019, was approved August 10, 2021

g. Has the CA identified any pollutants of concern beyond those in its local limits?		***X***

If yes, how has this been addressed?

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation?

None

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

This based on volume discharged compared to the POTW total flow. Any SIU that is due to flow is sampled monthly.

b. Is the frequency established above more, less, or the same as required? Same

Explain any difference.

Some facilities are sampled more frequently because of the surcharge assessed for high strength wastewater. (i.e. Bob Evans.)

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

Yes. The city performs IU monitoring at all permitted industries.

2. 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 July 2022 to June 2023.)

a. Not sampled or not inspected at least once [WENDB – NOIN]	***0****	***0***	%
b. Not sampled at least once [RIDE – SIUs Not Sampled]	***0***	***0***	%
c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]	***0***	***0***	%

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

* One facility was inspected in July 2023.

Two hospitals are on the city's IU list, but these have not been inspected. Hospitals do not have categorical pretreatment standards.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period: ***July 2022 thru June 2023***

0	%	Applicable Pretreatment Standards and reporting requirements
0	%	Self-monitoring requirements
0	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	***x***
EPA	

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: July 2022 thru June 2023

Number of SIUs: 19

Names of SIUs: *

*Lima Tank Wash and Ford had limit violations.

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

The inspection includes updating general facility information, process and wastewater information, toxics management and monitoring information. Most monitoring is conducted by the city. The city also requires that all industries provide the city with a copy of their SPCC plan.

Request a copy of the CA's inspection form, if applicable.

5. Who performs the CA's compliance monitoring analysis?

	Performed by: CA/Contract Laboratory Name
Metals	***Alloway***
Cyanide	***Alloway***
Organics	*****
Other (specify)	

****The city analyses phosphorus, ammonia, BOD, COD and TSS at the Lima WWTP.***

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	✓	Sample Splits	✓
Chain-of-custody forms	✓	Sample Blanks	✓
New Sampling Tubes	✓	Sample Spikes	✓
Field Blanks (for low level mercury)	✓	Other:	
Other:			

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

Keystone – Sample location was changed. The old sample location did not include both buildings.

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA? [403.12(j)&(p)]

Yes	No
	✓

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

IU permits

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

Annually during inspections. Specifically, if there is a new process, new tankage or new materials.

List SIUs required to have a slug discharge control plan:

None currently.

Yes	No
✓	

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

If not, which SIUs have not been evaluated? N/A

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

See Section 1, K

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

a. Has the ERP been adopted by the POTW? Yes

b. Has the ERP been approved by the Approval Authority? Yes

City is working on updates to the SUO.

c. Does the ERP describe how the CA will investigate instances of noncompliance?

Yes

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response?

Yes

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response?

Yes – The SUO states the Director is responsible. The Director is defined as, "the Director of Utilities of the City, or his authorized agent or representative."

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?

Yes

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

Yes. There haven't been any major compliance issues. A few facilities have had limit violations but have resampled and returned to compliance.

	Yes	No
3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]		✓
b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.		

Currently, no IUs are under a compliance schedule. Keystone was required to provide a representative sampling location, which they did.

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

	Yes	No
4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]		✓

If yes, attach a copy.

If no, explain.

No facilities were in SNC.

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?	**0**
b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?	***0***

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unknown	Explain
Interference		✓		
Pass through		✓		
Fire or explosions (flashpoint, and such)		✓		
Corrosive structural damage		✓		
Flow obstruction		✓		
Excessive flow rates		✓		
Excessive pollutant concentrations		✓		
Heat problems		✓		
Interference due to oil and grease (O&G)		✓		
Toxic fumes		✓		
Illicit dumping of hauled wastes		✓		
Worker health and safety		✓		
Other (specify)				

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

	Yes	No
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]		

N/A

	Yes	No
7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?	✓	

b. If yes, how many were due to nondomestic waste issues (O&G blockages)? None. All were wet weather or main breaks.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

No facilities have requested confidential status.

2. How are requests by the public to review files handled?

All requests for public information are filtered through the law department and all public information is released if deemed not confidential.

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so?

No. Ford will email self-monitoring results. Lima performs most sampling.

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

Spread sheets and raw data sheets. They are exploring adding these items to Opt 10 (operating program).

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

City council will advertise the agenda for all council meetings on line and via social media.

6. Explain any public or community issues affecting the CA's pretreatment program.

None

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

Forever

SECTION I: DATA REVIEW (CONTINUED)

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

1. Estimate the number of personnel (in FTEs) available for implementing the program.

Activity	FTEs	Activity	FTEs
Legal Assistance	***3***	Sample Analysis	***3.5***
Permitting	***3***	Data Analysis: Review and Response	***2***
Inspections	***3***	Enforcement	***5***
Sample Collection	***1.5***	Administration	***5***
		Total Number of FTEs	***6-7***

	Yes	No
2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)	✓	

If not, explain.

3. a. Estimate the annual operating budget for the CA's program. $ *

*The annual WWTP budget is $250,000. The budget does not break down how much is for the pretreatment program.

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?

Stay the same.

Discuss any changes in funding.

Surcharging policy may change. Currently based on results when sampled, but not all IUs are sampled every month.

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

None

SECTION I: DATA REVIEW (CONTINUED)

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

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

Periodic Training. The Association of Ohio Metropolitan Wastewater Authority keeps the city abreast of changes to the regulations.

Operators have continuing education through OTCO, OWEA and contract labs.

	Yes	No
b. Does the CA have adequate reference material to implement its program?	✓	

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times has the POTW monitored in the past year?

	Influent	Effluent	Sludge	Ambient (Receiving Water)
Metals	***12***	***12***	*	**
Priority pollutants	***1***	***1***	-	-
Biomonitoring	***4***	***4***	-	-
Toxicity Characteristic Leachate Procedure (TCLP)	***			
Extraction Procedure (EP) toxicity	-	-	-	-
Other (specify)	-	-	-	-

	Less	Equal	More
b. Is this frequency less than, equal to, or more than that required by the NPDES permit?		✓	

Explain any differences.

***Biosolids are only sampled when land applying. Currently they are landfilling sludge.**

****Only Selenium is sampled in the receiving stream.**

*****TCLP only done when recharacterizing grit and screenings for landfill. Typically, annually.**

Domestic wastewater background conducted during local limit study.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

	Yes	No
c. Is the CA reporting these results to the Approval Authority?	✓	

If yes, at what frequency?

As required in the NPDES permit.

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

	Yes	No
• Improvements in POTW operations	✓	
• Loadings to and from the POTW	✓	
• NPDES permit compliance	✓	
• Sludge quality?	✓	
• Sludge disposal options?	✓	
b. Has the CA documented these findings?	✓	

Explain. (Attach a copy of the documentation, if appropriate.)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Decreasing as PMPs are implemented as required in the NPDES permit.

Discuss on a pollutant-by-pollutant basis.

Generally, phosphorus and mercury are decreasing.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

	Yes	No
4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	✓	

This is done as part of the local limit study.

If yes, what was found?

If a TRE is triggered in the NPDES permit, then the City would investigate IUs to determine the source.

	Yes	No
5. a. Has the CA implemented any kind of public education program?	✓	
b. Are there any plans to initiate such a program to educate users about pollution prevention?		✓

Explain.

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

City holds a household hazardous waste drop off day.

The stormwater program (MS4) implements many pollutions prevention initiatives.

	Yes	No
7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?		✓

Explain.

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

Per last annual report:
10 CIU
5 SIU
1 Non-Significant Categorical User

8 Control documents
12 SIUs inspected
15 SIUs sampled
15 subject to local limits

None in SNC
Quarterly Reports:
Lima Tank Wash: issued an NOV for effluent violation on 04/28/2023
Lima Tank Wash: issued an NOV 3/2/22 (Zinc – returned to compliance)
Superior Forge and Steel: issued an NOV on 02/07/2022 for failure to submit annual Mercury PMP and SPCC plan

City SUO definition of SNC:

an industrial user is in significant noncompliance if its violations meet one or more of the following criteria:

(1) Chronic violations of wastewater discharge limits (applies only to SIUs), defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) an instantaneous limit, the daily maximum limit, or the average limit for the same pollutant parameter;

(2) Technical review criteria (TRC) violations (applies only to SIUs), defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of an instantaneous limit, the daily maximum limit, or the average limit multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH);

(3) Any other violation of a pretreatment effluent limit (daily maximum or longer term average) that the Director determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);

(4) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of emergency authority to halt or prevent such a discharge;

(5) Any violation of an established BMP that adversely affects the operation of the POTW or implementation of the pretreatment program;

(6) Failure to meet, within ninety days after the schedule date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;

(7) Failure to provide, within forty-five days after the due date, required reports such as baseline monitoring reports, initial compliance reports, periodic self- monitoring reports, and reports on compliance with compliance schedules;

(8) Failure to accurately report noncompliance;

(9) Any other violation or group of violations which the Director determines will or has adversely affected the operation or implementation of the City's pretreatment program.

SECTION I COMPLETED BY:	DATE:
Peggy Christie	July 27, 2023
TITLE:	TELEPHONE:
Environmental Engineer II	419-373-3006

SECTION II: IU FILE EVALUATION

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 PCA should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE 1: Industry name and address Randall Bearing 240 Jay Begg Lima, OH 45804	Type of industry Manufacturer of Custom Machined Parts SIC Code:3568 NAICS Code:333613	
[X] CIU 40 CFR 438, _____, _____ Category(ies) Metal products and Machinery. No pretreatment standards. [ ] Other SIU [x] Non-SIU [ ] NSCIU	Average total flow (gpd) Industry visited during audit Yes [X] No [ ]	Average process flow 0 – this facility does not discharge process wastewater
Comments Sector AB – Do not currently have MSGP or No Exposure Certification		
FILE 2: Industry name and address Pepsi Beverages Company 1750 Greely Chapel Road Lima, OH 45804	Type of industry SIC Code:2086 NAICS Code:312111	
[ ] CIU 40 CFR _____, _____, _____ Category(ies) _____ [X] Other SIU [ ] Non-SIU [ ] NSCIU	Average total flow (gpd) Industry visited during audit Yes [X] No [ ]	Average process flow
Comments Cans are not manufactured at this facility. General Industrial stormwater permit: 2GR01808*FG		

FILE 3: Industry name and address Keystone 3585 Harding Hwy Lima, OH 45804	Type of industry SIC Code: 2011 NAICS Code: 311612	
[x] CIU 40 CFR 432, Category(ies) _____ [ ] Other SIU [ ] Non-SIU [ ] NSCIU	Average total flow (gpd) 31,000 Industry visited during audit Yes [ ] No [X]	Average process flow

Comments

I requested to review the permit for this facility since the other two facilities were not currently permitted. I did not to conduct a site visit or file review.

SECTION II: IU FILE EVALUATION

General Comments

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					
Randall Bearings	Pepsi Beverages Company	Keystone			**INSTRUCTIONS**: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments 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 a 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, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.
File 1	File 2	File 3	File ___	File ___	**IU FILE REVIEW**

						Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
NA	***N***	***ND***			1. Control mechanism application form	
NA	***N***	***ND***			2. Fact sheet	
					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
NA	***N***	***Y***			a. Individual control mechanism	
NA	***N***	***N***			b. General control mechanism	403.8(f)(1)(iii)(A)
					4. Control mechanism contents	403.8(f)(1)(iii)(B)
NA	***N***	***Y***			a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
NA	***N***	***Y***			b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
NA	***N***	***Y***			c. Applicable effluent limits (local limits, categorical standards, BMPs	403.8(f)(1)(iii)(B)(3)

Comments: Keystone cans meat (chicken, pork and beef). Canned meat is regulated under 40 CFR 432. There are no pretreatment standards.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
		*			d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
NA	***N***	***Y***			Identification of pollutants to be monitored	
NA	***N***	***NA***			Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
NA	***N***	***NA***			Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
NA	***N***	***NA***			Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
NA	***N***	***Y***			Sampling frequency	
NA	***N***	***ND***			Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
NA	***N***	***Y***			Sampling locations/discharge points	
NA	***N***	***Y***			Sample types (grab or composite)	
NA	***N***	***Y***			Reporting requirements (including all monitoring results)	
NA	***N***	***Y***			Record-keeping requirements	

Comments:

*The City performs all sampling for Keystone.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
NA	***N***	***Y***			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
NA	***N***	***NA***			f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
NA	***N***	***Y***			g. Notice of slug loadings	403.12(f)
NA	***N***	***Y***			h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
NA	***N***	***Y***			i. Notification of significant change in discharge	403.12(j)
NA	***N***	***Y***			j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
NA	***N***	***Y***			k. 24-hour notification of violation/resample requirement	403.12(g)(2)
NA	***N***	***NA***			l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
NA	***NA***	***NA***			5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
NA	***NA***	***NA***			a. Involve the same or similar operations	
NA	***NA***	***NA***			b. Discharge the same types of wastes	
NA	***NA***	***NA***			c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
NA	***NA***	***NA***			Contact information	
NA	***NA***	***NA***			Production processes	
NA	***NA***	***NA***			Types of waste generated	
NA	***NA***	***NA***			Location for monitoring all wastes covered by the general permit	
NA	***NA***	***NA***			Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
NA	***NA***	***NA***			e. Documentation to support the POTW's determination	

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File ___	File ___	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
Y	***N****	***ND***			1. IU categorization	403.8(f)(1)(ii)
NA	***NA***	***NA***			2. Calculation and application of categorical standards	403.8(f)(1)(ii)
NA	***NA***	***NA***			a. Classification by category/subcategory	
NA	***NA***	***NA***			b. Classification as new/existing source	
NA	***NA***	***NA***			c. Application of limits for all regulated pollutants	
NA	***NA***	***NA***			d. Classification as an NSCIU	403.3(v)(2)
NA	***NA***	***NA***			e. Documentation for the qualification to be classified as NSCIU	
NA	***NA***	***NA***			f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
NA	***N***	***Y***			3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA	***Y***	***Y***			4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA	***NA***	***NA***			5. Calculation and application of production-based standards	403.6(c)

Comments:

Pepsi used to report flows to the city that were calculated based on water process deduct meter. The city discovered that there was a flow meter that captured all flows to the city and determined that Pepsi was discharging enough volume to qualify as an SIU. The city is in the process of permitting this facility.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File ___	File ___	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
NA	***NA***	***NA***			6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
NA	***NA***	***NA***			a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
NA	***NA***	***NA***			b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
NA	***NA***	***NA***			c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
NA	***NA***	***NA***			d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
NA	***NA***	***NA***			e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
NA	***NA***	***NA***			f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
NA	***NA***	***NA***			g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
NA	***NA***	***NA***			h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
NA	***NA***	***NA***			7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
NA	***NA***	***NA***			a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
NA	***NA***	***NA***			b. Documentation that dilution is not being used as treatment? (Y/N)	
NA	***NA***	***NA***			8. Calculation and application of CWF or FWA	403.6(d)&(e)
NA	***NA***	***NA***			9. Application of most stringent limit	403.8(f)(1)(ii)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
Y	***Y***				1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
NA	***NA***				a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
NA	***NA***				Evaluation of discharger with the definition of NSCIU once per year	
NA	***NA***				b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
NA	***NA***				Inspect at least once every 2 years	
Y	***Y***				2. Inspection at frequency specified in approved program	403.8(c)
Y	***Y***				3. Documentation of inspection activities	403.8(f)(2)(v)
Y	***Y***				4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
Y	***Y***				5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
NA	***NA***				a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
NA	***NA***				Sample waived pollutant(s) at least once during the term of the control mechanism	
NA	***NA***				b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
NA	***NA***				Sample and analyze IU discharge at least once every 2 years	
Y	***Y***				6. Sampling at the frequency specified in approved program	403.8(c)
Y	***Y***				7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
Y	***Y***				8. Analysis for all regulated parameters	403.12(g)(1)
Y	***Y***				9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
NA	***NA***				1. Identification of violations	403.8(f)(2)(vii)
NA	***NA***				a. Discharge violations	
NA	***NA***				IU self-monitoring	
NA	***NA***				CA compliance monitoring	
NA	***NA***				b. Monitoring/reporting violations	
NA	***NA***				IU self-monitoring	
NA	***NA***				Reporting (e.g., frequency, content)	
NA	***NA***				Sampling (e.g., frequency, pollutants)	
NA	***NA***				Record-keeping	
NA	***NA***				Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
NA	***NA***				Slug discharge control plan	
NA	***NA***				Compliance schedule/reports	
NA	***NA***				c. Compliance schedule violations	
NA	***NA***				Start-up/final compliance	
NA	***NA***				Interim dates	

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
NA	***NA***				2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
NA	***NA***				a. Chronic	
NA	***NA***				b. TRC (Technical Review Criteria)	
NA	***NA***				c. Pass through/interference	
NA	***NA***				d. Spill/slug reporting load	
NA	***NA***				e. Reporting	
NA	***NA***				f. Compliance schedule	
NA	***NA***				g. Other violations (e.g., BMPs requirements)	
NA	***NA***				3. Response to violation	
NA	***NA***				4. Adherence to approved ERP	403.8(f)(5)
NA	***NA***				5. Return to compliance	
NA	***NA***				a. Within 90 days	
NA	***NA***				b. Within time specified	
NA	***NA***				c. Through compliance schedule	
NA	***NA***				6. Escalation of enforcement	403.8(f)(5)(ii)
NA	***NA***				7. Publication for SNC	403.8(f)(2)(viii)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
NA	***NA***				1. Self-monitoring and reporting	
NA	***NA***				a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
NA	***NA***				b. Analysis of all required pollutants	403.12(g)(1)&(h)
NA	***NA***				c. Appropriate analytical methods (40 CFR Part 136)	
NA	***NA***				d. Appropriate sample collection methods	
NA	***NA***				e. Compliance with sample collection holding times	
NA	***NA***				f. Submission of BMR/90-day report	403.12(b) &(d)
NA	***NA***				g. Periodic self monitoring reports	403.12(e)&(h)
NA	***NA***				h. Reporting all required pollutants	403.12(g)(1)&(h)
NA	***NA***				i. Signatory/certification of reports	403.12(l)
NA	***NA***				j. Annual certification by NSCIUs	403.12(q)
NA	***NA***				k. Submission of compliance schedule reports by required dates	403.12(c)
NA	***NA***				l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
NA	***NA***				Discharge violation	
NA	***NA***				Slug load	
NA	***NA***				Accidental spill	
NA	***NA***				m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
NA	***NA***				n. Notification of hazardous waste discharge	403.12(j)&(p)
NA	***NA***				o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
NA	***NA***				p. Notification of significant changes	403.12(j)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
NA	***NA***				2. Compliance with all general control mechanism requirements	
NA	***NA***				3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
NA	***NA***				Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)	
NA	***NA***				Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW	
NA	***NA***				Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant	
NA	***NA***				4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
NA	***NA***				Certification statements with each compliance report	
NA	***NA***				5. Compliance with BMR requirements, if applicable (Y/N)	
NA	***NA***				6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
NA	***NA***				IU discharges less than 100 gpd of total categorical wastewater	
NA	***NA***				Annual certification statements from the IU	

Comments: Neither of these facilities are currently under permit. Randall Bearings does not discharge a process wastewater

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
NA	***NA***				7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
NA	***NA***				IU is effectively operating treatment technologies to achieve compliance	
NA	***NA***				IU is recording the facility's flow rates	
NA	***NA***				IU is recording the facility's production rates	
NA	***NA***				IU has notified the CA whenever production rates vary	
NA	***NA***				IU continues to employ water conservation methods/technologies	

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					F. OTHER	

Comments

SECTION II COMPLETED BY: ***Peggy Christie***	DATE: 07/31/2023
TITLE: Environmental Engineer II	TELEPHONE: 419-373-3006

SECTION III: OBSERVATIONS AND CONCERNS

INSTRUCTIONS: On the basis of the information and data evaluated, summarize the observations and concerns of the audit for each program element shown below. Identify all problems or deficiencies from 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	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
Status of program modifications	403.18	I.A.1
The city has hired a consultant to evaluate the pretreatment program. The report has made several recommendations and the city is evaluating these recommendations.		
Modification to the program to accommodate the 2005 General Pretreatment Regulation changes	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
N/A		
B. LEGAL AUTHORITY		
Minimum legal authority requirements	403.8(f)(1)	I.B.2&3
None (no concerns)		
Adequate multijurisdictional agreements	403.8(f)(1)	I.B.1&3
None		

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
Application of *significant industrial user* definition	403.3(v)(1)	I.C.1; Attach B.E.2
None		
Application of *middle-tier CIU* definition		
None		
Application of *NSCIU* definition		
None		
Identify and categorize IUs	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B
Continue to permit facilities identified in the Geosyntec report.		
D. CONTROL MECHANISM		
Issuance of individual or general control mechanisms to all SIUs	403.8(f)(1)(iii)	I.D.1
Permit facilities identified in the Geosyntec report		
Adequate control mechanisms	403.8(f)(1)(iii)(B)	II.A.4
The control mechanism that was reviewed was adequate.		
Adequate control of trucked, railed, and dedicated pipe wastes	403.5(b)(8)	I.D.2&3, E.1
None		

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
Appropriately categorize, notify, and apply all applicable pretreatment standards	403.8(f)(1)(ii)&(iii) 403.5	II.B
Continue to work on recommended changes in the Geosyntec report		
Basis and adequacy of local limits	403.8(f)(4); 122.21	I.E.3&4
None		
F. COMPLIANCE MONITORING		
Adequate sampling and inspection frequency	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
None		
Adequate inspections	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
None		
Adequate sampling protocols and analysis	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9
None		

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
Adequate IU self-monitoring	403.8(f)(2)(iv)	I.F.6,G.5; II.E
None. City conducts most of the sampling requirements. Only a few IUs have self-monitoring requirements.		
Notification of changed and hazardous waste discharges	403.12(j)&(p)	I.F.8; II.D.1.b
None		
Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(vi)	I.F.9; II.C.4
None		
Monitor to demonstrate continued compliance and resampling after violation(s)	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
None		
G. ENFORCEMENT		
Appropriate application of *significant noncompliance* definition	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
None		
Develop and implement an ERP	403.8(f)(5)	I.G.2; II.D.3
None		
Annually publish a list of IUs in SNC	403.8(f)(2)(viii)	I.G.4; II.D.7
None		

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
G. ENFORCEMENT (continued)		
Effective enforcement	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
None		
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
Effective data management/public participation	403.5(c)(3); 403.12(o); 403.14	I.H
None		
I. RESOURCES		
Adequate resources	403.8(f)(3)	I.I
None		

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
Understanding of pollutants from all sources		I.J.1&3
None		
Documentation of environmental improvements/effectiveness		I.J.2
None		
Integration of pollution prevention		I.J.6
None		
K. ADDITIONAL EVALUATIONS/INFORMATION		
None		

SECTION II COMPLETED BY: Peggy Christie	DATE: July 31, 2023
TITLE: Environmental Engineer II	TELEPHONE: 419373-3006

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name of industry: Randall Bearings

Address of industry: 240 Jay Begg, Lima, Ohio

Date of visit: June 28, 2023 | Time of visit: 10:00 AM

Name of inspector(s): Ms. Kim Furry, WWTP Supervisor/Lima
Mr. Eric Bontrager, Enviro Compliance Manger
Ms. Amy Straley, Industrial Monitoring &Lab Chief

Provide the name(s) and title(s) of industry representative(s)

Name	Title	Phone/E-mail
Tim Toland	***Plant Manager***	***419-296-0602 (cell)***
		419-223-1075 (office

IU Permit Number: NA | Exp Date: NA | IU Classification: Non-SIU

Inspection	***X***	Scheduled		Unscheduled		PCA
Type/Purpose	***X***	PCI		New Company		Complaint

Please provide the following documentation:

1. Nature of operation: Manufacturer of bronze alloys, bearings and washers and a small amount of stainless-steel bearings.

2. Number of employees	***74***	Number of shifts:	***3***	Hours of operation:	***8***

3. Water source:
City of Lima

4. Waste stream flow(s) discharged to the POTW:
Primarily sanitary. There is a trench drain at the emergency eye wash/shower area.

Sanitary:	1300 (gpd)	Process:	0 (gpd)	Combined:	1300 (gpd)

5. Describe any significant changes in process or flow: Some increase in production, but it is leveling off.

6. Type of pretreatment system (Describe): None

	Continuous flow		Batch		Combined

7. Condition/operation of pretreatment system (Describe): N/A

SITE VISIT DATA SHEET (Continued)

8. Process area description (identify raw materials and processes used):

All coolant is recycled until it cannot be used, and then it is disposed of off site.

9. Condition/operation of process area (Describe):
Clean. This is a new location for this business.

Any unusual conditions or problems with the process area:

None

10. General housekeeping in process area (Describe):

Good. Facility is very clean and well organized.

Any unusual conditions or problems with general housekeeping in process area:

None

11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):
There is a trench drain in the oil storage area. I recommend that this drain is plugged.

Any floor drains?	***Yes***	Any spill control measures?	***Yes***

General housekeeping of chemical storage area (Describe):
Okay

12. Are hazardous wastes drummed and labeled? N/A

13. Does the IU have hazardous waste manifests? N/A

Any problems associated with hazardous waste: N/A

SITE VISIT DATA SHEET (Continued)

14. Solid waste production:
Glass bead blast – used to remove small burrs on the parts

Solid waste disposal method(s):

Allied Environmental

15. Description of sample location:

Cleanout located on the west side of the building.

Sampling method/technique: Composite sample conducted by the city

16. Evaluation of self-monitoring data:		Yes		No	X	N/A

If yes, was self-monitoring adequate:
NA

17. Who performs the self-monitoring analysis?
City of Lima performs all sampling requirements.

Notes:

There are no federal effluent guidelines for this process.

The following wastewater discharges are not subject to this part:

(1) Non-process wastewater as defined at § 438.2(e).

(2) Wastewater discharges introduced into a Publicly Owned Treatment Works (POTW) or a Federally owned and operated Treatment Works Treating Domestic Sewage (TWTDS), as defined at 40 CFR 122.2.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name of industry: Pepsi Beverages Company

Address of industry: 1750 Greely Chapel Road

Date of visit: June 28, 2023 | Time of visit: 2:00 PM

Name of inspector(s): Ms. Kim Furry, WWTP Supervisor/Lima
Mr. Eric Bontrager, Enviro Compliance Manger
Ms. Amy Straley, Industrial Monitoring &Lab Chief

Provide the name(s) and title(s) of industry representative(s)

Name	Title	Phone/E-mail
Bruce Crosby	***Env. Health and Safety Manager***	
Christina Waldrop	***EHS Resource***	

IU Permit Number: - | Exp Date: - | IU Classification: SIU

Inspection	***X***	Scheduled		Unscheduled		PCA
Type/Purpose	***X***	PCI		New Company		Complaint

Please provide the following documentation:

1. Nature of operation: Carbonated soft drinks bottling.

2. Number of employees	***110***	Number of shifts:	***3***	Hours of operation:	***24***

3. Water source: City of Lima

4. Wastestream flow(s) discharged to the POTW:
Sanitary, flavor change overs, sludge blowoffs, general cleaning, condensing tower.

Sanitary:	ND (gpd)	Process:	ND (gpd)	Combined:	31,000(gpd)

5. Describe any significant changes in process or flow: No changes and no changes expected

6. Type of pretreatment system (Describe): EQ tank, two reaction tanks for pH adjustment.

X	Continuous flow		Batch		Combined

7. Condition/operation of pretreatment system (Describe):
Mr. Crosby and Ms. Waldrop are responsible for the pretreatment system. The system has continuous monitoring.

SITE VISIT DATA SHEET (Continued)

8. Process area description (identify raw materials and processes used):
Process consists of mixing and bottling of the beverages. Raw materials include high fructose corn syrup, flavors and additives.

9. Condition/operation of process area (Describe):
Clean

Any unusual conditions or problems with the process area: None

10. General housekeeping in process area (Describe):
Good

Any unusual conditions or problems with general housekeeping in process area:

None

11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):
Chemicals stored in a contained area. Mainly caustic and acid and cleaning chemicals.

Any floor drains?	***Yes***	Any spill control measures?	***Yes***

General housekeeping of chemical storage area (Describe): Area is clean.

There are no floor drains in the chemical storage area, there are floor drains in the process area.

12. Are hazardous wastes drummed and labeled? Ethanol is the only hazardous waste, only 2 gal/year. Label was needed on the container

13. Does the IU have hazardous waste manifests? Yes – Heritage Crystal Clean

Any problems associated with hazardous waste: The area need organization.

SITE VISIT DATA SHEET (Continued)

14. Solid waste production: damaged packaging and trash.						
Solid waste disposal method(s): Waste management to landfill						
15. Description of sample location: Manhole on the east side of the plant						
Sampling method/technique: Both composite and grabs collected by city						
16. Evaluation of self-monitoring data:		Yes		No	***x***	N/A
If yes, was self-monitoring adequate: City performs all required sampling.						
17. Who performs the self-monitoring analysis? City of Lima and Alloway						
Notes:						
Flow meter was calibrated 12/22. ***Facility has a slug plan for discharging off spec batches.***						