Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

Re: Lima WWTP
Inspection
NPDES
Allen County
2PE00000

March 17, 2017

Mayor and Council
City of Lima
50 Town Square
Lima, Ohio 45801

Dear Mayor and Council Members:

On February 28, 2017, a Pretreatment Audit of the City's approved Pretreatment program was conducted. Mr. David Schnipke, Mr. Jim Bookman and Mr. Rob Flinn were present to provide pretreatment information to Ohio EPA representative, Peggy Christie.

The pretreatment compliance inspection followed a checklist designed to evaluate the major areas of the City's program, a file review, and an inspection of two of the City's industrial users (Ford Motor Company and Dana Holding Corporation). Our inspection findings and recommendations are summarized below.

All industrial user inspections and sampling requirements are being carried out. Your implementation of Lima's approved pretreatment program remains satisfactory.

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

Sincerely,

alex Smail

for Elizabeth A. Wick, P.E.
Environmental Engineer/Section Manager
Division of Surface Water

PBC/jlm
Enclosure
ec: Ms. Phoebe Low, CO, DSW
Mr. Eric Markley, WWTP Supervisor, City of Lima
Mr. David Schnipke, Environmental Compliance Manager, City of Lima
Mr. Jim Bookman, Industrial Monitoring and Laboratory Chief, City of Lima
Inspection Tracking

Ohio EPA

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**
Audit	*Peggy Christie*	*1*	*02/28/2017*

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)
David Schnipke/Environmental Compliance Manager/(419) 228-5462 ext 5130
James R. Bookman/Industrial Monitoring and Laboratory Chief/(419) 221-5196
Rob Flinn/Industrial Monitoring Technician

FACILITY EVALUATION

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

	IU Permit Issuance		CA Inspection Activities
	IU Permit Contents		CA Enforcement Activities
	CA Compliance Monitoring		IU Self-Monitoring

* See inspection letter

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
Peggy B. Christie	Ohio EPA/NWDO/419-373-3006	March 9, 2017
Signature of Reviewer Thomas Poffenbarger, P.E.	Ohio EPA/NWDO/419-373-3000	Date 3/16/17

PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Control Authority (CA) name and address	Date(s) of Audit

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Peggy Christie	Environmental Engineer/Ohio EPA	419-373-3006

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
Mr. David Schnipke	***Environmental Compliance Manager***	419-221-5294
Mr. James Bookman	***Industrial Monitoring and Laboratory Chief***	419-221-5196
Mr. Rob Flinn	***Industrial Monitoring Technician***	

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	
Ford Motor Company ***1155 Bible Road*** ***Lima, Ohio***	***Manufacturer of automotive engines***	
IU CLASSIFICATION BY CA: ☐ Categorical SIU - 40 CFR____, ______, ______Category(ies) ___ ☒ Non-categorical SIU ☐ Non SIU	Average total flow (gpd)	Average process flow (gpd) ***100,000-120,000***
	Industry visited during PCI? Yes ☒ No ☐	

COMPLIANCE STATUS

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

EXPLANATION:

Comments: Sanitary is discharged through a separate line.

IU IDENTIFICATION (Continued)

FILE _2_ Industry name and address	Type of industry	
Dana Holding Corporation ***777 Bible Road*** ***Lima, OH 45801-2025***	***Manufactures driveshafts for the automotive industry***	
IU CLASSIFICATION BY CA: ☐ Categorical SIU - 40 CFR ______, ______, ______Category(ies) __ ☐ Non-categorical SIU ☒ Non SIU	Average total flow (gpd) ***1300***	Average process flow (gpd)
	Industry visited during PCI? Yes ☒ No ☐	

COMPLIANCE STATUS

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

EXPLANATION:

Comments: This facility used to have a discharge permit with the City, but they now haul all the process wastewater off-site to Valicor for recycling. Currently they only discharge sanitary wastewater to the City.

The City inspects this facility once a year and samples them twice a year.

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

Comments: Dana is not under permit. They no longer discharge process wastewater to the City.

File *1*	File *2*	File	File	File	SECTION I: IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	
	N/A				d. IU self-monitoring requirements	403.8(f)(1)(iii)(D)
Y					• Identification of pollutants to be monitored	
Y					• Sampling frequency	
Y					• Sampling locations/discharge points defined	
Y					• Reporting requirements	
Y					• Appropriate sample types (grab or composite)	
Y					• Record keeping requirements	403.12(o)
N/A	N/A				e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
Y	N/A				f. Compliance schedules/progress reports (if applicable)	
Y	N/A				g. Requirement to notify CA of slug loadings	
Y	N/A				h. Requirement to notify CA of spills, bypasses, upsets, etc.	
Y	N/A				I. Requirement to notify CA of significant change in discharge	
Y	N/A				j. 24-hour notification of violation/resample requirement	403.8(f)(1)(iii)(D)
N/A	N/A				k. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)

Comments

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

Comments

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

Comments: Both facilities are in compliance.

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

Comments:

Older file reference in Dana's file of notification of SNC and publication in paper. But the facility is in compliance currently.

SECTION I COMPLETED BY:	Peggy B. Christie	DATE: 02/28/2017	
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.)

None

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

If yes, describe.

Yes	No
	✓

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
✓	

Findlay Road area. Drains to the City, metered and billed. All domestic wastewater.

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

Yes	No
	✓

   If yes, explain.

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

1. Have you changed how SIUs are classified?

No

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

Usually they contact City through developer. They fill out a waste characterization form. Can catch new small users through new account billing.

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

a) Inspections

b) Industrial monthly billing – all industrial users are entered into a spread sheet. Changes in flow will be flagged.

c) Sampling

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

	Number	Percent
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]		*0%*
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.

	Yes	No
2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the POTW?		✓

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

Discuss:

D. CONTROL MECHANISM EVALUATION (Continued)

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

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

Lima accepts trucked waste from: Allen County WWTP biosolids; Septage; EOLM C&DD Landfill; Bluffton aeration (septage)

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)]

New hauled wastes are sampled. (Either by the City or Alloway)

Check pH of all grease traps.

Review MSDS

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)]

Either the SUO limits or categorical, whichever is more stringent.

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)]

Workshops; OTCO; Government Affairs every year gives a heads up on new/proposed regulations; Attorneys; Federal Register; Professional Journals; WEF.

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?		✓

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

If yes, how has this been addressed? N/A

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

None. No new limits since last inspection.

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 ***January 2016*** to ***January 2017***.)

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

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

All IUs are inspected and sampled every year.

2. Who performs your compliance sampling and analysis?

	Sampling	Analysis
• Metals	*City*	*Alloway*
• Cyanide	*City*	*Alloway*
• Organics	*City*	*Allowy*
• Conventionals	*City*	*City*
• Other (specify)		

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)]

City and Alloway participate in the USEPA DMRQA program. City runs duplicates on every test.

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

No problems noted.

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

During inspections. City has not had any issues with slug loads in the last 5 years.

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		✓	
• Pass through		✓	
• Fire or Explosions		✓	
• Corrosive structural damage		✓	
• Flow obstructions		✓	
• Excessive flow rates		✓	City will request (batch) IUs to hold wastewater during storm events.
• Excessive pollutant concentrations		✓	
• Heat problems		✓	
• Interference due to O & G		✓	
• Toxic fumes		✓	
• Illicit dumping of hauled wastes		✓	
• Worker health and safety concerns		✓	
• Other (specify)		-	

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

N/A

	Yes	No
b. Were you made aware of any hazardous waste discharges to the POTW?		✓

If yes, explain.

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

G. ENFORCEMENT (Continued)

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

a. Date of last modification:

No modifications since last inspection

b. Problems with implementation:

None

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

Yes

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

On a case by case basis – legal included if necessary.

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

Never had a request, but they are public records. Never had a request for confidential status from an IU.

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

Files for every entity

Spreadsheet of all IUs

Access data base (flow data through billing)

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

Haven't purged any records

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)]

Usually through new media and council. All council meetings are televised.

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].	~19

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

If no, explain.

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

No problems noted.

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.

Yes.

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
	✓

No issues currently.

   If yes, what was found?

N/A

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.		✓
b.		✓

   Explain.

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

City holds a household hazardous waste Day.

Through the mercury PMP – encourage industries to move toward using less mercury.

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

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

Explain.

Through the mercury PMP – worked with dentist to use amalgam strainers and use of non-mercury fillings.

The City has seen a downward trend in mercury.

K. ADDITIONAL EVALUATIONS/INFORMATION

None

SECTION II COMPLETED BY:	Peggy B. Christie	DATE: 02/28/2017
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)		None
Currently no modifications are pending.		
B. LEGAL AUTHORITY		
• Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)		None
SUA updated and approved by Council on June 23, 2014		
• Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)		None
Written agreement with Allen County.		
C. IU CHARACTERIZATION		

Description	Recommended Action	Required Action
• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)		None
No issues identified.		
D. CONTROL MECHANISM		
• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/ Checklist II.D.1)		None
All IU permits are effective.		
Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)		None
Control mechanisms are effective.		

Description	Recommended Action	Required Action
Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&4) Yes		None
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
• Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3) Ohio EPA approved local limits.		None
F. COMPLIANCE MONITORING		
• Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1) Yes		None
• Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) Yes		None

Description	Recommended Action	Required Action
• Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4) Yes		None
• Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) No issues identified.		None
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b) No issues identified.		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) Evaluated during annual inspections		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) No issues identified		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) No issues identified		None
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2) No issues identified		None
• Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) No issues identified		None
• Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&5;II.G.2.c&d, 5&6) No issues identified.		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
No issues identified		
I. RESOURCES		
• Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)		None
Yes		
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
• Understanding of pollutants from all sources (Checklist II.J.1&2)		None
Yes		

Description	Recommended Action	Required Action
• Documentation of environmental improvements/effectiveness (Checklist II.J.1)		None
Yes		
• Integration of pollution prevention (Checklist II.J.3,4&5)		None
No issues identified.		

K. ADDITIONAL EVALUATIONS/INFORMATION
No issues identified.

SECTION III COMPLETED BY:	Peggy B. Christie	DATE: 02/28/2017
TITLE:	Environmental Engineer	TELEPHONE: 419-373-3006

IU SITE VISIT DATA SHEET

IU SITE VISIT REPORT FORM

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

Name and address of industry: Dana Holding Corporation

Date of visit: 2/28/2017	Time of visit: 1:00 PM

Name(s) of inspector(s):

David Schnipke/Environmental Compliance Manager/(419) 228-5462 ext 5130
James R. Bookman/Industrial Monitoring and Laboratory Chief/(419) 221-5196
Rob Flinn/Industrial Monitoring Technician

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

Name	Title
Kent Brice	DOS Manager
Larry Kuehl	Maintenance Manager
Greg Morris	Environmental Engineer (Corporate)

Classification assigned by CA:

Did the CA inspector review/obtain the following as part of the industrial inspection?

1. Description of the products manufactured or the services provided by the IU. **Yes**
2. Verification of the IU's classification or discussion of any changes. **Yes**
3. Description of any significant changes in processes or flow. **Yes**
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.) **Yes**
5. Description of the sample location and any differences in CA and IU locations. **Yes**
6. Description of the treatment system which is in place. **N/A – no treatment system**
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention. **Yes**
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems. **Yes**

Notes: All process wastewater is now hauled to Valicor. City noted that the containment pit around the hauled wastewater tanks had some oily waste and trash.

IU Name: ***Dana Holding Corporation***	Date: 02/28/2017
Notes:	

IU SITE VISIT REPORT FORM COMPLETED BY:	Peggy Christie	DATE: 02/28/2017
TITLE:	Environmental Engineer	TELEPHONE: 419-373-3006

Name and address of industry: Ford Motor Company – Lima Engine Plant	
Date of visit: 02/28/2017	Time of visit: 9:45 AM
Name(s) of inspector(s) David Schnipke/Environmental Compliance Manager/ (419) 228-5462 ext 5130 James R. Bookman/Industrial Monitoring and Laboratory Chief/ (419) 221-5196 Rob Flinn/Industrial Monitoring Technician	
Provide name(s) and title(s) of industry representative(s).	
Name	**Title**
David Russell	Ford Environmental Quality Office
Kevin P. Bruin	PTO Senior Plant Environmental Engineer
Tom Sheidler	Facilities Manager
Classification assigned by CA:	

Did the CA inspector review/obtain the following as part of the industrial inspection?

1. Description of the products manufactured or the services provided by the IU. **Yes**
2. Verification of the IU's classification or discussion of any changes. **Yes**
3. Description of any significant changes in processes or flow. **Yes**
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.) **Yes**
5. Description of the sample location and any differences in CA and IU locations. **Yes**
6. Description of the treatment system which is in place. **Yes**
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention. **Yes**
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems. **Yes**

Notes:

Ford uses a modified Windsor process to treat wastewater to remove oil and precipitate metals.

Coolant water is sent to filters and reused.

IU Name: Ford Motor Company – Lima Engine Plant	Date: 02/28/2017
Notes:	

IU SITE VISIT REPORT FORM COMPLETED BY:	***Peggy Christie***	DATE: 02/28/2017
TITLE:	Environmental Engineer	TELEPHONE: 419-373-3006

WENDB AND RNC WORKSHEET

FACILITY INFORMATION	
Name: City of Lima WWTP	Date of Inspection: 02/28/2017
OH Number: OH0026069	NPDES Number: 2PE00000

I. WENDB DATA ENTRY WORKSHEET

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

		Checklist Reference		PCS
	Data	PCI	AUDIT	**Code**
Number of SIUs	*12*	Annual	Annual	SIUS
Number of CIUs	*10*	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	*0*	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)	*01/14/1992*			
Technical Evaluation of Local Limits (Y/N) (Audit)	*Y*			
Adoption of technically-based limits (Y/N) (Audit)	*Y*			

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	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