



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

December 2, 2016

Mr. James P. Shaw III, P.E.  
Lucas County Sanitary Engineer  
1111 South McCord Road  
Holland, Ohio 43528

**Re:** Lucas County WRRF  
Inspection  
NPDES  
Lucas County  
2PK00000

Dear Mr. Shaw:

On November 21, 2016, a pretreatment inspection was conducted at the Lucas County WRRF. Ms. Alexandra Slawinski and Mr. Jason Collins were present and provided information concerning the operation and effectiveness of the pretreatment program.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 419-373-3053 or e-mail at [Ryan.Gierhart@epa.ohio.gov](mailto:Ryan.Gierhart@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Gierhart", is written over a horizontal line.

Ryan Gierhart, P.E., R.S.  
Environmental Specialist III  
Compliance and Enforcement  
Ohio EPA Division of Surface Water

/jlm

Enclosure

cc: Phoebe Low, DSW, CO  
Tracking

# PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME <b>Lucas County WRRF</b>	PERMIT NUMBER <b>OH0034223</b>	FACILITY NUMBER <b>2PD00018</b>
INSPECTION TYPE <b>Compliance Inspection</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>1</b>
		DATE CONDUCTED <b>11/21/2016</b>

## GENERAL INFORMATION

### NAME AND LOCATION OF FACILITY

**Lucas County WRRF**  
**5758 North River Road**  
**Waterville, OH 43566**

### MAILING ADDRESS OF FACILITY

**Lucas County WRRF**  
**5758 North River Road**  
**Waterville, OH 43566**

### CONTACT (NAME/TITLE/PHONE)

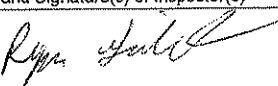

Ms. Alexandra Slawinski/Pretreatment Coordinator/419-213-8750  
Mr. Jason Collins/Assistant Superintendent/419-213-8745

## FACILITY EVALUATION

(S = Satisfactory, M = Marginal, U = Unsatisfactory N = not evaluated)

	Pretreatment		N	Inspections
	Site/Facility Review			Monitoring Program/permitting
	Enforcement Program			

\* See inspection letter

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
 <b>Ryan Gierhart, P.E., R.S</b>	Ohio EPA/DSW/419-373-3053	<b>11-29-16</b>
Signature of Reviewer		Date
 <b>Thomas Poffenbarger, P.E.</b>	Ohio EPA/DSW/419-373-3000	<b>11/30/16</b>

# POTW PRETREATMENT COMPLIANCE CHECKLIST

## PCI CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation

Section II Supplemental Data Review/Interview

Section III Evaluation and Summary (Optional)

Attachment A Pre-Inspection Checklist

Attachment B Pretreatment Program Profile

Attachment C Worksheets

WENDB/ RNC Worksheet

IU Site Visit Report Form (Optional)

File Review Worksheets (Optional)

Attachment D Supporting Documentation

Control Authority (CA) name and address

Date(s) of PCI

*Lucas Count WRRF  
5758 North River Road  
Waterville, OH 43566*

11/21/2016

### INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Ryan Gierhart, P.E., R.S.	Environmental Specialist II	419-373-3053

### CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
Alexandra Slawinski	Pretreatment Coordinator	419-213-8750
Jason Collins	Assistant Superintendent	419-213-8745

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 I Industry name and address

**Moore Metal Finishing**

**3525 Silica Rd.**

**Sylvania, OH 43560**

Type of industry:

**Electroplater**

IU CLASSIFICATION BY CA:

☐ Categorical SIU - 40 CFR 433-17 \_\_\_\_\_, \_\_\_\_\_,

Category(ies) Metal Finishing

☐ Non-categorical SIU

☐ Non SIU

Average total flow (gpd)

30,000

Average process flow (gpd)

30,000

Industry visited during PCI?

Yes ☐

No ☐

#### COMPLIANCE STATUS

☐ SNC (period: 10/2016 )

☐ Noncompliance/corrected ☐ Noncompliance/continuing ☐ In compliance

EXPLANATION:

Comments

Facility in SNC for zinc limits.

FILE II Industry name and address

**Johns Manville Plant I**

**6050 River Road**

**Waterville OH 43566**

Type of industry

**Glass manufacturer SIC 3296**

IU CLASSIFICATION BY CA:

☐ Categorical SIU - 40 CFR \_\_\_\_\_, \_\_\_\_\_,

Category(ies) \_\_\_\_\_

☐ Non-categorical SIU

☐ Non SIU

Average total flow (gpd)

265,000

Average process flow (gpd)

265,000

Industry visited during PCI?

Yes ☐

No ☐

#### COMPLIANCE STATUS

☐ SNC (period: \_\_\_\_\_ )

☐ Noncompliance/corrected ☐ Noncompliance/continuing ☐ In compliance

EXPLANATION:

Comments

### IU IDENTIFICATION (Continued)

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

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

### IU IDENTIFICATION (Continued)

FILE ____ Industry name and address	Type of industry
-------------------------------------	------------------

IU CLASSIFICATION BY CA:

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

☐ Non-categorical SIU ☐ Non SIU

Average total flow (gpd)

Average process flow (gpd)

Industry visited during PCI Yes ☐ No ☐

COMPLIANCE STATUS

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

EXPLANATION:

Comments

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

Type of industry

IU CLASSIFICATION BY CA:

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

☐ Non-categorical SIU ☐ Non SIU

Average total flow (gpd) Average process flow (gpd)

Industry visited during PCI? Yes ☐ No ☐

COMPLIANCE STATUS

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

EXPLANATION:

Comments

General Comments





## SECTION I: IU FILE EVALUATION

Industry Name					<p>INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Use NA (not available) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Use an "x" in the space when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.</p>
File	File	File	File	File	
Moore Metal Finishing	Johns Manville Plant 1				
IU FILE REVIEW					Reg. Cite
A. CA NOTIFICATION OF IU					
√	√				1. Notified of classification (new IU) or change in classification (existing IU) 403.8(f)(2)(iii)
√	√				* BMR/90-day report submitted (for new IU) 403.12(b)&(d)
√	√				2. Notified of applicable RCRA standards 403.8(f)(2)(iii)
<p>Comments</p>					

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

*Language for notification does not include spills or bypasses only upsets are noted.*

*Metal Moore permit did not have language to notify CA when there is a significant change in discharge*

*Johns Manville permit did not have the 24 hour notice of violation language.*

*The appropriate sampling type for each parameter should be designated in the Johns Manville permit*

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

## SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
					1. Response to violations	403.8(f)(2)(vi)
√	N/A				a. Discharge violations	
N/A	N/A				b. Monitoring/reporting violations	
N/A	N/A				c. Compliance schedule violations	
					2. Proper calculation of SNC	403.8(f)(2)(vii)
√	N/A				a. Chronic	
N/A	N/A				b. TRC	
N/A	N/A				c. Pass-through/interference caused by spill or slug discharge	
N/A	N/A				d. Reporting requirements	
√	N/A				3. Publication for SNC	403.8(f)(2)(vii)
√	N/A				4. Adherence to approved ERP	403.8(f)(5)
X	N/A				a. Proper response to violations	
X	N/A				b. Escalation of enforcement	

Comments:

*A formal notice of violation letter was not sent to the facility. A template for a notice of violation is located in the ERP but was not used. Only a one-page document was given to the facility indicating what parameter they violated.*

## SECTION I: IU FILE EVALUATION (Continued)

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

Comments:

*Did not observe a response in the file from Moore finishing in regard to their violations.*

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

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

Comments:

SECTION I COMPLETED BY:	Ryan Gierhart	DATE:	11/29/2016
TITLE:	Environmental Specialist III	TELEPHONE:	419-373-3053

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

**INSTRUCTIONS:** Complete this section during the onsite visit based on based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

### A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. Have you made any changes to the approved program since the last inspection? (Local limits, ERP, SUO, control mechanisms, SIU list, etc.)

**Yes**

**No**

x

If yes, discuss.

2. Have you identified any needed changes?

**Yes**

**No**

x

If yes, describe.

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

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

*Onsite inspection and evaluation of sources of wastewater. Evaluate on a case by case basis as notified of new business entering the system.*

2. How and when do you identify changes in wastewater discharges at existing IUs  
(especially to determine if they need to be classified as a SIUs)

*During Annual inspections or notifications by IUs as required by discharge permits*



## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

### C. CONTROL MECHANISM EVALUATION [403.8(d)(1)(iii)]

<p>1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENB~NOCM][RNC~I] If any, explain.</p>	0	%				
<p>2. a. How many control mechanisms were allowed to expire prior to reissuance? If any explain.</p>	0					
<p>b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC~II] If any, explain.</p>	0					
<p>c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; text-align: center;">Yes</th> <th style="width: 50%; text-align: center;">No</th> </tr> <tr> <td style="text-align: center;">x</td> <td></td> </tr> </table>		Yes	No	x	
Yes	No					
x						

*Send form prior to renewing permits.*

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

### D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS [403.8(f)(1)(iii)]

1. a. How and when do you evaluate SIUs for the need to develop slug control discharge plans?

(check on CA's definition of slug discharge)

If any, explain.

*During inspections and evaluate new industries. The slug discharge definition is different in the sewer use ordinance than what is in the ERP*

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

8

2. a. Describe any wastes hauled to the POTW. *No hauled waste*

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

- c. List IUs that haul their wastewater to the POTW. *N/A*

### E. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were the following: [403.8(f)(2)(v)][WENDB~NOIN][RNC II]  
(Define the 12 month period October 2015 to October 2016)

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

0	%
0	%
0	%

- b. Not sampled at least once

- c. Not inspected at least once (all parameters)?

If any, explain.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB~SNIN]

0

If any, explain.

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

### F. ENFORCEMENT

1. Which of the following enforcement actions did you use during the past year?

- a. Notice or letter of violation
- b. Administrative Order
- c. Administrative fine
- d. Show cause hearing
- e. Compliance schedule
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of service
- j. Other (specify)

Yes	No
X	
	X
	X
	X
	X
	X
	X
	X
	X
	X

Explain if appropriate:

*Published SNC facility in Toledo Blade*

2. Did the treatment plant experience any following during the past year?

- a. Interference
- b. Pass through
- c. Fire or explosions (flashpoint, etc.)
- d. Corrosive structural damage
- e. Flow obstructions
- f. Excessive flow rates
- g. Excessive pollutant concentrations
- h. Heat problems
- i. Interference due to O & G
- j. Toxic fumes
- k. Illicit dumping of hauled wastes
- l. Worker health and safety concerns
- m. Other (specify)

Yes	No	Explain
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	

If yes, how did you respond?

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

### F. ENFORCEMENT (continued)

3. Were you made aware of any hazardous waste discharges to the POTW? [403.12 (j)&(p)]

Yes

No

x

### G. GENERAL OBSERVATIONS/INFORMATIONENFORCEMENT

Have you had any problems (general or specific) implementing your approved program?

Yes

No

x

Additional Comments/Observations/Information:

SECTION I COMPLETED BY: Ryan Gierhart

DATE: 11-29-2016

TITLE: Environmental Specialist III

TELEPHONE: 419-373-3053

### SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>		
<ul style="list-style-type: none"> <li>Status of program modifications (Ref. 403.18 /Checklist II.A.1)</li> </ul> <p><i>No current modifications</i></p>		
<b>B. LEGAL AUTHORITY</b>		
<ul style="list-style-type: none"> <li>Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)</li> </ul> <p><i>Ensure definition of slug discharge match sewer use ordinance</i></p>	x	
<ul style="list-style-type: none"> <li>Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)</li> </ul> <p><i>N/A</i></p>		

### C. IU CHARACTERIZATION

- Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)

*No action required.*

### D. CONTROL MECHANISM

- Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1)

*No action required*

Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)

*No action required*

Description	Recommended Action	Required Action
<p>Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&amp;4)</p> <p><i>N/A No wastes are hauled to the treatment system.</i></p>		
<b>E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>		
<ul style="list-style-type: none"> <li>Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&amp;(iii); 403.5 /Checklist I.A)</li> </ul> <p><i>No action required. Glass manufacturing is listed as categorical but it is for new sources only and no pretreatment limits are established in 40 C.F.R. 426.16</i></p>		
<ul style="list-style-type: none"> <li>Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&amp;3)</li> </ul> <p><i>No action required at this time. The NPDES permit compliance schedule has a local limit justification schedule.</i></p>		
<b>F. COMPLIANCE MONITORING</b>		
<ul style="list-style-type: none"> <li>Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&amp;(v)/Checklist I.B.1&amp;2, II.F.1)</li> </ul> <p><i>No action required.</i></p>		

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Adequate inspections (Ref. 403.8(f)(2)(v)&amp;(vi)/Checklist I.B.1; II.F.1)</li> </ul> <p><i>No action required.</i></p>		
<ul style="list-style-type: none"> <li>Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&amp;4)</li> </ul> <p><i>No action required.</i></p>		
<ul style="list-style-type: none"> <li>Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F)</li> </ul> <p><i>No action required.</i></p>		
<p>Notification of changed and hazardous waste discharges (Ref. 403.12(j)&amp;(p)/ Checklist I.C.1.b; II.G.1.b)</p> <p><i>No action required.</i></p>		



Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>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)</li> </ul> <p><i>No action required.</i></p>		
<ul style="list-style-type: none"> <li>Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&amp;(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b)</li> </ul> <p><i>No action required.</i></p>		
<b>G. ENFORCEMENT</b>		
<ul style="list-style-type: none"> <li>Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1)</li> </ul> <p><i>No action required.</i></p>		

Description	Recommended Action	Required Action
<p>Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)</p> <p><i>Follow template in ERP for notice of violations.</i></p>	x	
<ul style="list-style-type: none"> <li>Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4)</li> </ul> <p><i>No action required.</i></p>		
<ul style="list-style-type: none"> <li>Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&amp;5;II.G.2.c&amp;d, 5&amp;6)</li> </ul> <p><i>No action required.</i></p>		

Description	Recommended Action	Required Action
<b>H. DATA MANAGEMENT/PUBLIC PARTICIPATION</b>		
<ul style="list-style-type: none"> <li>Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H)</li> </ul> <p><i>No action required.</i></p>		
<b>I. RESOURCES</b>		
<ul style="list-style-type: none"> <li>Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)</li> </ul> <p><i>No action required.</i></p>		

Description	Recommended Action	Required Action
<b>J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION</b>		
<ul style="list-style-type: none"> <li>Understanding of pollutants from all sources (Checklist II.J.1&amp;2)</li> </ul> <p><i>No action required.</i></p>		
<ul style="list-style-type: none"> <li>Documentation of environmental improvements/effectiveness (Checklist II.J.1)</li> </ul> <p><i>No action required.</i></p>		
<ul style="list-style-type: none"> <li>Integration of pollution prevention (Checklist II.J.3,4&amp;5)</li> </ul> <p><i>No action required.</i></p>		

Description	Recommended Action	Required Action
K. ADDITIONAL EVALUATIONS/INFORMATION		

SECTION III COMPLETED BY:	Ryan Gierhart	DATE:	11-29-2016
	TITLE:	TELEPHONE:	419-373-3053

## WENDB AND RNC WORKSHEET

### FACILITY INFORMATION

Name <b>Lucas County Wastewater Recovery Facility</b>	Date of Inspection <b>11-21-2016</b>
OH Number <b>OH0034223</b>	NPDES Number <b>2PK00000*LD</b>

### I. WENDB DATA ENTRY WORKSHEET

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

	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	8	Annual	Annual	SIUS
Number of CIUs	6	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)	-			
Technical Evaluation of Local Limits (Y/N) (Audit)	N/A			
Adoption of technically-based limits (Y/N) (Audit)	N/A			

### 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			