

## 2006 EVALUATION OF THE DEFIANCE PRETREATMENT PROGRAM

The following is an evaluation of the Defiance Pretreatment Program in outline form:

### A. ADEQUACY OF ORDINANCE

Our Sewer Use Ordinance, which was approved by City Council on October 15, 1991, continues to enable us to effectively implement our Pretreatment Program. This ordinance is continually being reviewed and will be updated if required.

### B. OPERATING PROCEDURE

Operating procedures for our Pretreatment Program continue to be adequate over the past year. Our pretreatment short form and procedures continue to allow us to effectively deal with potential new sewer users.

### C. FINANCE

Our Pretreatment budget has been adequate for effectively administrating our program operation. Copies of our budgets for 2005 and 2006 are attached.

### D. ADEQUACY OF INDUSTRIAL USER (IU) DISCHARGE LIMITS

Our local limits justification, originally submitted in 1991 using the PRELIM 4.0 computer model, has enabled us flexibility in issuance of limits as well as reserve capacity of regulated pollutants. With the aid of our Excel spreadsheet model, we can quickly review the impact a new industry and/or expansion at an existing industry will have on the local limits database. Our last NPDES Permit for our plant required a re-evaluation of our local limits. The technical justification of our conventional metals local limits has been completed and was approved by the Ohio EPA on November 16, 2004. The technical justification of our local limit for mercury was also completed and filed with the Ohio EPA for review and approval in February of 2003. This submittal was also approved on November 16, 2004.

No change in the allocation of conventional metals to our industries was required as a result of this process. However, a change to a Best Management Practices (BMP) narrative local limit for mercury was implemented in 2005 as a result of the OEPA technical justification review process.

A copy of our local metals mass balance allocation spreadsheet is attached. This sheet is updated annually for industrial flows and indicates the reserves of the various metals allocated to our local industries. Defiance has site-specific local limits.

E. ACCOMPLISHMENTS

1. Permit Activity - (1) Permit was modified to make slight adjustments in local limits. The monitoring and sampling provisions of one (1) permit was deleted due to a plant closing. (1) Permit was modified to reflect a name change.
2. Computerizing Pretreatment Program - We continue to utilize our computer resources to help implement and maintain the pretreatment program. The following information management systems help us implement and maintain the pretreatment program:
  - a. All of our installed computer hardware (ten total personal computers and one file server) is running on Microsoft 2000.
  - b. One personal computer is assigned to the Pretreatment Coordinator to store and manage all the pretreatment program information such as:
    - 1) Pretreatment correspondence
    - 2) Pretreatment inspection follow-up letters
    - 3) Industrial metals allocation spreadsheet
    - 4) Priority pollutant analysis reports
    - 5) Industrial violation reports
    - 6) Industrial sample records
    - 7) Industrial discharge permit forms
    - 8) Laboratory analysis and sample tracking forms
    - 9) Pretreatment requirements and forms
3. Local Limit Revisions - Our existing local limits that were last submitted on March 15, 1993, and approved by OEPA on June 8, 1993, have proved adequate. These local limits were originally technically justified by using the PRELIM 4.0 computer model. Since the approval and implementation of our revised local limits, we have not experienced any treatment plant effluent violation for pollutants regulated at the industrial users.

Since our local limits are site specific, we have various discharge limitations for the industries. These limits are assigned according to past discharge history, allowable headworks loading, availability, and categorical standards. By incorporating this unique method of allocation, we can adjust the local limits accordingly as long as the adjustments do not cause us to exceed our allowable headworks loading. In fact, OEPA's letter dated August 27, 1992, states that as long as the established headworks loading is not exceeded, a modification to the City's Pretreatment Program is not needed. Therefore, we are constantly reviewing our industry's pollutant allocations and adjusting as needed.

Our current NPDES Discharge Permit required that the technical justification for both our conventional metals and mercury be updated. The technical justification of our conventional metals local limits was completed by our consulting engineers and submitted to the Ohio EPA for review and approval on June 29, 2001. No changes in conventional metals local limits were necessary as the result of this process. The technical justification process for our local mercury limit was completed and submitted to the Ohio EPA for review and approval on February 26, 2003. Both of these submissions received final Ohio EPA approval on November 16, 2004. As noted above, all of our industrial discharge permits were modified to provide for Best Management Practices (BMP) local limits for mercury.

Continuing Education – Our Assistant Superintendent / Pretreatment Coordinator retired in April 2006 and a replacement was hired in March 2006. The new Assistant Superintendent will further his knowledge in Pretreatment matters through Section Meetings and Pretreatment Workshops.

4. Unusual Discharge Requests - We continue to accept leachate from the Defiance County Landfill. The landfill is operating a pump station that pumps leachate to the City's sanitary sewer collection system. This eliminated the need to truck leachate to the City's wastewater treatment plant.

The acceptance of leachate into our treatment plant continues to have no detrimental effect on our discharge quality or performance of our treatment plant. We have issued the Defiance County Landfill a discharge permit for this wastewater.

Data from the County's pump station is telemetered to the City's treatment plant. An odor control system was also incorporated into the County's pump station. The County leachate pump station is automatically shut down via telemetry signals to prevent the discharge of leachate through CSO outlets during periods of wet weather and high flow. This arrangement has worked well over the past year.

We continue to work with a local industry on acceptance of process pond water. The City has required extensive sampling and testing of this pond water to protect the treatment plant against any pollutant that might have a detrimental effect on the treatment plant processes or discharge quality. To date, the only problem we experience is occasional foaming in our anaerobic digesters. We are currently working with the industry to identify and correct this problem. The acceptance of this wastewater is considered temporarily and is conditional to the terms outlined in writing.

5. Sampler and Parts Inventory - We continue on a yearly basis to evaluate our sampler inventory and parts inventory to have adequate equipment on hand to sample and monitor our industries. We are experiencing problems in acquiring parts for our current samplers. This past year we purchased one new sampler, manufactured and serviced in the United States. Once we gain knowledge and dependency on this type of sampler, we will pursue the purchase of more samplers and eventually phase out the current samplers.

6. Water Pollution Control Web Site – The Defiance Water Pollution Control Division has devoted considerable time and effort into developing a helpful and informative section on the City of Defiance web site. Our WPC site includes information on the Defiance treatment plant, the various Water Pollution Control subdivisions, and an extensive description of our pretreatment program. Citizens and prospective businesses and industries can use this site to obtain information (including a copy of our sewer ordinance) regarding our pretreatment program and requirements. The web site can be reached at [www.cityofdefiance.com/WPC/index.htm](http://www.cityofdefiance.com/WPC/index.htm).

#### F. ENFORCEMENT SUCCESS

For the fifth year in a row we had no industries in significant noncompliance (SNC) with discharge permit limits or reporting requirements. As a result, it was not necessary to publish the names of any of our industries for SNC during 2005/2006.

#### G. PROBLEMS

At the present time, we are experiencing no unusual problems administering and enforcing our Pretreatment Program.

#### H. PRIORITY POLLUTANT SCAN

Based upon our knowledge, none of the reported results from our priority pollutant scan appear to be at levels of which to be concerned. A copy of the most recent priority pollutant scan is attached.

#### I. RECOMMENDATIONS

We recommend that Ohio EPA continue with the District Pretreatment Coordinator Meetings. These meetings that involve OEPA representatives from Columbus, as well as members from the District Office are most helpful to all Pretreatment Coordinators through sharing information and/or experiences regarding their industrial customers. Having a new Assistant Superintendent / Pretreatment Coordinator, these meetings will help not only in keeping up to date on new regulations, but also allow him to meet other Pretreatment Coordinators in Ohio.