



ANNUAL REPORT CERTIFICATION
INSTRUCTIONS (Form 4117, 4221)

Publicly owned treatment works (POTWs) with approved pretreatment programs are required by their NPDES permits to submit an annual report to Ohio EPA describing program progress and overall effectiveness. It is through the annual report that the POTW evaluates its existing procedures, resources and program priorities and highlights the accomplishments of its program. The annual report should also address any problems or deficiencies of the program and recommend a course of action for their resolution. Reports not containing the required information will be considered incomplete and, if not corrected, may result in enforcement action against the POTW.

Reports should be mailed to Ohio EPA at the following address prior to the due date specified in the NPDES permit.

Ohio EPA
Division of Surface Water
Pretreatment Unit
PO Box 1049
Columbus, OH 43216-1049

FORMAT

The annual report shall be submitted on standard size 8.5 by 11 inch paper. Where forms are provided, they should be utilized to keep report length to a minimum. These forms may be altered or adapted to fit any word processing capabilities of the POTW provided all information is included.

Where an approved pretreatment program includes more than one wastewater treatment plant, some of the information is to be provided separately for each plant. Where this is required, it has been noted in the instructions. The annual report is to be compiled as follows:

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Annual Report Certification Form AR-1: This page provides basic information on the POTW submitting the annual report, including the person to contact regarding information submitted in the report. The designated person should be the primary contact for the pretreatment program for communications between Ohio EPA and the approved pretreatment program. The official signing the certification on this form must be a principal executive officer, ranking elected official or other duly authorized employee. The duly authorized employee must be an individual or position having responsibility for the overall operation of the facility or the Pretreatment Program. This

authorization must be made in writing by the principal executive office or ranking elected official, and submitted to the Ohio EPA prior to or together with the report being submitted.

Pretreatment Performance Summary Form AR-2: Complete Form AR-2. Refer to OAC 3745-3-03(C)(2)(g) and OAC 3745-3-1(GG) for definitions of significant noncompliance (SNC) and your sewer use ordinance for a definition of significant industrial user (SIU). Include the annual newspaper publication of industrial users in significant noncompliance.

Industrial User Inventory and Monitoring Program: The instructions for completing these forms are provided below. Any comments on the industrial user inventory, explanations of deviations from the approved monitoring program, or discussion of special investigations should be included as narrative. A separate inventory should be provided for each treatment plant in the program.

1) General Monitoring: On Form AR-3, list the POTW compliance monitoring and industrial user self-monitoring by local classification (i.e. significant, minor, insignificant, etc.) as required in your approved program. If applicable to your program, below these, list all general permits that have been issued, and the inspection and sampling frequencies required for each general permit.

2) Exceptions to Standard Monitoring: On Form AR-4, list all industrial users that have atypical monitoring requirements, if applicable to your program. For categorical users, indicate whether the user is classified as a non-significant categorical industrial user as defined in OAC 3745-3-01(Q), or a mid-tier categorical industrial user as defined in OAC 3745-3-01(L). Also identify categorical users that have been granted monitoring waivers pursuant to OAC 3745-3-03(C)(1)(d), and industrial users that are not required by your program to monitor all local limits by checking the applicable column.

3) Industrial User Inventory and Monitoring: A complete list of industrial users under permit by the POTW and the associated monitoring must be provided on Form AR-5, including industrial users covered by general permits, if applicable to your program. The listing should be arranged alphabetically by facility name with the respective local classification and flow rate. Upon request, your Ohio EPA District Office may approve waiving the requirement to list nonsignificant industrial users and/or industrial users covered by general permits on the report, though a list of all industrial users must still be maintained on file at the POTW if a waiver is granted.

In the column labeled "Local Classification", indicate your program's specific classification for each industry, such as categorical, significant, minor significant, nonsignificant, etc. and indicate any facilities covered by a general permit.

In the column labeled "Applicable Standards", indicate the limits that apply to the industry. For categorical users, enter the category (i.e. 413, 433, etc.) and for industries regulated only by local limits, indicate by "local".

In the monitoring columns list all inspections, sampling events, and industrial user self-

monitoring that actually occurred during the previous twelve months.

4) Industrial Inventory Modifications:

Report any changes to the inventory that have occurred during the past year on Form AR-6. When an industrial user has been eliminated from the program, the reason for elimination must be explained (i.e. no discharge of process waste, installed total recycle system, changed to direct discharge, closed down operations, etc.). When an industrial user has been added, the following information must be provided: name, address, contact person, process description, local classification, flow rate, pollutants discharged, and applicable categorical standard(s). Indicate and explain any significant changes to an existing industrial user's process description, reclassification of categorical status, including to or back from nonsignificant or mid tier classifications, or changes in local classification.

5) Upset, Interference, and Pass-through: Information regarding instances of upsets, interference (including interference with sludge disposal options or exceedance of applicable sludge criteria) or pass-through at the POTW should be summarized and reported on Form AR-7. If possible, identify the industrial user responsible for the incident.

6) Priority Pollutant Scan: The annual priority pollutant scan for each POTW in your approved program must be reported on the Priority Pollutant Reporting Form and be included in this section.

PRETREATMENT PRIORITY POLLUTANT REPORTING FORM INSTRUCTIONS

The pretreatment Priority Pollutant Reporting Form is designed to provide a standardized format for POTWs with approved pretreatment programs to report results of priority pollutant analysis on POTW influent, effluent and sludge samples as required by the NPDES permit. POTWs may provide this form to the laboratory conducting analysis or transcribe data from laboratory sheets to this form. If the laboratory provided data on this form, they should also include information documenting quality control. Please note that the POTW is responsible to Ohio EPA to ensure that information provided is representative of the influent, effluent and sludge.

All priority pollutants specified on the Priority Pollutant Reporting Form must be analyzed and reported.

If the POTW pretreatment program covers more than one treatment plant, separate forms must be submitted for each plant.

POTW: Provide the name of the pretreatment control authority and treatment plant.

LABORATORY: Provide the name of the laboratory that performed the analysis.

SAMPLING: Provide the time and date that samples were collected. For composite samples, note the sample start and stop time. The appropriate detention time through the treatment plant should be considered when taking samples. Sludge 1 should be

considered the samples taken from the final clarifiers. Sludge 2 is the analysis of sludge removed to disposal. Sludge 1 is required only if specifically stated in Part II, Other Requirements of the NPDES permit.

SAMPLING LOCATION: Provide the exact location where each sample was collected (i.e. influent prior to grit chamber, effluent prior to chlorination, etc.).

TYPE OF SAMPLE: Provide the type of sample collected (e.g. composite, grab, multiple grab). For composite samples, specify whether the sample was flow proportional or time proportional. If the sample type was unique, describe under "other".

COMMENTS: U.S. EPA approved test methods are outlined in 40 CFR 136. Provide methods of analysis for any parameter where U.S. EPA approved methods do not exist and specify the parameter. Provide explanations for any codes used in the data reporting section. Provide information on data anomalies and any other appropriate comments.

POTW PRETREATMENT CONTACT: This section must be signed by a representative of the POTW with the responsibility of administering the pretreatment program.

DATA RESULTS: Influent and effluent data must be reported in micrograms per liter. Sludge data must be reported in milligrams per kilograms dry weight. For pollutants which are below the detectable limit, use the data substitution code "AA" and provide the appropriate detection limit in the parentheses for each parameter.

Program Evaluation: On Form AR-13, provide a narrative description of program activities during the past year, including a general summary of the effectiveness of the program in controlling industrial waste. This evaluation of your program should include the following items:

1) Approved Program Components: A review shall be conducted to determine if the legal authority, procedures and resources that make up the approved pretreatment program are adequate to carry out the required program activities. This review shall include:

a) A review of all changes to State and/or Federal pretreatment regulations during the past year must be conducted to determine if revisions to the approved pretreatment program are required. If so, a program modification request should be listed in Section 4 below and submitted to make these revisions.

b) A review and determination of the adequacy of the POTW's sewer use ordinance. Is the legal authority provided in the POTW's sewer use ordinance sufficient to adequately implement and enforce the pretreatment program?

c) A review of the operating procedures of the pretreatment program. This review should also include a discussion of any general permits issued by the pretreatment program, including target group and permit contents.

d) A description of the method used by the POTW to finance the costs of pretreatment program implementation, indicating the annual budget available for pretreatment for both this reporting period and for the next reporting period (proposed budget). Explain any financing problems the POTW may be experiencing relative to pretreatment.

e) A discussion on whether existing local limits are sufficient to achieve program goals.

2) **Accomplishments:** Highlight the accomplishments of the POTW in the implementation of the pretreatment program. Has the pretreatment program benefited the POTW treatment plant operations (including the reduction of loadings to the POTW)? Also highlight enforcement successes.

3) **Problems:** Discuss any problems encountered in the implementation of the pretreatment program, as well as any proposals for their resolution.

4) **Program Modifications:** Provide a list of all pending and proposed modifications to the pretreatment program, including any modifications needed to resolve problems identified in Paragraph (3) above. Use Form EPA 4115 to apply for approval of these modifications.