

**CLEAN WATER ACT TRIP REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

Purpose

Pretreatment discussion with Lima Wastewater Treatment Plant (WWTP)

Meeting Place

Lima Wastewater Treatment Plant
1200 Ft Amanda Road
Lima, Ohio 45804

Date of Meeting

May 8, 2025

WWTP Representatives

Amy Staley, Lima WWTP Industrial Monitoring Chief/Lab Supervisor
Joe Welker, Lima WWTP Assistant Supervisor

EPA Representatives

Jennifer Bush, Environmental Scientist, (312) 886-0879, Bush.Jennifer@epa.gov
Tatiana Frontera, Life Scientist, (312) 353-5307, Frontera.Tatiana@epa.gov
Gigi Giampietro, Environmental Engineer, (312) 353-4778, Giampietro.Gabrielle@epa.gov

EPA Representative Signature: JENNIFER BUSH  Digitally signed by
JENNIFER BUSH
Date: 2025.06.25
14:00:59 -05'00'

Approver Signature: MOLLY SMITH  Digitally signed by
MOLLY SMITH
Date: 2025.06.26
15:23:26 -05'00'

On May 8, 2025, Jennifer Bush, Tatiana Frontera, and Gigi Giampietro of EPA visited staff from the City of Lima Wastewater Treatment Plant (WWTP) to discuss the industrial wastewater discharges from industrial users in the City's sewer system and the City's pretreatment program. EPA arrived at the Lima WWTP, located at 1200 Ft Amanda Street in Lima, Ohio at 1:35 p.m. EDT for the meeting.

WWTP staff told EPA the following information about the WWTP and industries that discharge to the WWTP:

- WWTP History:
 - WWTP staff told EPA there have been times in the past that foam will discharge through the manhole near the front of the WWTP (at the influent house), and close to the public road.
 - In 2004, there was a large foaming incident at the WWTP. The incident resulted in Lima Tank Wash, Inc. being issued an NOV. Lima Tank Wash, Inc., a water tank cleaning service, had cleaned out Procter & Gamble Co. (P&G) tanks prior to the incident occurring.
- P&G:
 - The P&G facility in Lima, Ohio produces laundry detergents and fabric softeners (Tide, Gain, and Downey products).
 - The facility is an industrial user that discharges to the Lima WWTP.
 - The WWTP staff told EPA that P&G has been providing defoaming agents to the WWTP for approximately 15 years.
 - The WWTP has not taken any enforcement against P&G.
- Nelson Packaging, Inc.:
 - Nelson Packaging, Inc. is an industrial user that also discharges wastewater to the Lima WWTP.
 - Nelson Packaging, Inc. packages detergent products from the P&G facility in Lima, Ohio.
 - WWTP staff told EPA that in the past, if foaming issues occur at the WWTP, P&G claim the foam discharge is from Nelson Packaging, Inc.
 - Nelson Packaging, Inc. and P&G are both located on Reservoir Road in Lima, Ohio, and previously shared a sampling location. In the most recent permit issued to P&G (February 2025), the WWTP moved the sampling location from the shared manhole, to a manhole on P&G property.
- WWTP Operations:
 - WWTP staff told EPA that when foaming occurs within the plant, the defoaming agent is usually added at the influent. However, during the most recent foaming event prior to the EPA site visit, the defoaming agent was added at the effluent channel. WWTP staff told EPA the last foaming event was the week prior to EPA's site visit (Week of May 1, 2025).
 - WWTP staff told EPA the foam events typically follow a rain event.
 - WWTP staff believe the foaming issues begin once the discharge from the final lift station enters the influent, because the influent has an aerated grit system (the aeration agitates foam in the discharge as it enters the plant).
 - WWTP staff told EPA foam has also been observed in the aeration process in the past.

- WWTP Walk-through:
 - At the time of the site visit, WWTP staff were storing a tote of defoaming agent near the chlorine contact and effluent channel. The shipping label on the tote was addressed to the P&G Lima facility.
 - There was minimal foaming observed at the time of EPA's site visit. (See photos 4 and 7 in Attachment A).
- EPA Request:
 - EPA requested that the WWTP provide EPA with photos, if available, from previous foaming issues that have occurred at the WWTP during the last 5 years. EPA also asked if photos would be collected during any future foaming events, and the WWTP stated it may take and provide pictures during of future foaming events.

EPA staff left the Lima WWTP at 2:40 p.m. EDT.

- Post-EPA Site Visit:
 - On May 13, 2025, WWTP staff provided EPA with the following photographs:
 - Photo of effluent channel from Fall 2024 "1000009444" and,
 - Photo of effluent channel from Fall 2024 "1000009445".
 - On May 16, 2025, WWTP staff provided EPA with the following photographs:
 - Photo of manhole cover at headworks "20250516_081020";
 - Photo of primary tank "1000009821";
 - Photo of aerated grit tanks "1000009819";
 - Photo of aerated grit tanks "1000009816"; and,
 - Photo of aerated grit tanks "1000009815".

Attachment A: Photo Log from EPA Site Visit on April 8, 2025.

Attachment B: Photos received from Lima WWTP on May 13, 2025 and May 16, 2025.

Lima Wastewater Treatment Plant
EPA Inspection May 8, 2025
All photos taken by Jennifer Bush, Environmental Scientist, U.S. EPA
Camera: Ricoh WG-4 SR Adventure Proof, Serial No. 3101181



1: RIMG0309

Description: Manhole near influent of Lima WWTP, with WWTP Administration Building seen in background.

Location: Lima WWTP

Camera Direction: West

Date/Time: May 8, 2025, 2:13 p.m. EDT



2: RIMG0310

Description: Tote of defoaming agent stationed near the effluent channel. Tote provided to the Lima WWTP by Procter & Gamble Co. WWTP building in background

Location: Lima WWTP

Camera Direction: North

Date/Time: May 8, 2025, 2:19 p.m. EDT



3: RIMG0311

Description: Defoaming agent tote with hose into effluent channel

Location: Lima WWTP

Camera Direction: Southwest

Date/Time: May 8, 2025, 2:20 p.m. EDT



4: RIMG0312

Description: View down into the effluent channel prior to discharge to the receiving water (Ottawa River). Defoaming agent hose seen on top of photo.

Location: Lima WWTP

Camera Direction: Down

Date/Time: May 8, 2025, 2:21 p.m. EDT



5: RIMG0313

Description: Close-up photo of shipping label to Procter & Gamble Co. on defoaming agent tote.

Location: Lima WWTP

Camera Direction: North

Date/Time: May 8, 2025, 2:22 p.m. EDT



6: RIMG0314

Description: Overview of defoaming/anti-foam label on tote

Location: Lima WWTP

Camera Direction: North

Date/Time: May 8, 2025, 2:22 p.m. EDT



7: RIMG0315

Description: Effluent water leaving chlorine contact before entering the effluent channel.

Location: Lima WWTP

Camera Direction: Down, into grate over channel

Date/Time: May 8, 2025, 2:24 p.m. EDT



8: RIMG0316

Description: Receiving water (Ottawa River) at discharge location from Lima WWTP

Location: Lima WWTP

Camera Direction: South

Date/Time: May 8, 2025, 2:26 p.m. EDT



9: RIMG0317

Description: Receiving water (Ottawa River) at discharge location from Lima WWTP

Location: Lima WWTP

Camera Direction: Camera facing down at outfall location

Date/Time: May 8, 2025, 2:26 p.m. EDT



10: RIMG0318

Description: Receiving water (Ottawa River) at discharge location from Lima WWTP

Location: South

Camera Direction: Lima WWTP

Date/Time: May 8, 2025, 2:26 p.m. EDT



11: RIMG0319

Description: Outfall signage posted on fence at the outfall location

Location: Lima WWTP

Camera Direction: South

Date/Time: May 8, 2025, 2:28 p.m. EDT

1:24 

5G  77% 



IMG_7541.jpg

3.3 MB



1:25 

5G  77% 



IMG_7542.jpg

2.6 MB











