



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

VIA EMAIL

Valerie Moore, Executive Director
Eastern Ohio Regional Wastewater Authority
6000 North Guernsey Street
Bellaire, Ohio 43906
vmoores@eorwa.org

Subject: June 27 to 29, 2023, Pretreatment Compliance Inspection Report for the Eastern Ohio Regional Wastewater Authority

Dear Ms. Moore:

Please find enclosed a copy of the inspection report generated as a result of the pretreatment compliance inspection of the Eastern Ohio Regional Wastewater Authority, conducted by the U.S. Environmental Protection Agency from June 27 to 29, 2023. The purpose of the inspection was to conduct a review of the City's pretreatment program implementation. During the inspection, EPA observed several areas of concern; these are listed in the enclosed report. Please provide a written response to the areas of concern identified in the report within 30 days. In your response, please include a description of actions taken to correct any issues documented in the inspection report. Your response should be submitted electronically to ellens.newton@epa.gov and r5pretreatment@epa.gov. Where it is infeasible to submit electronically, you may mail the information to:

Newton Ellens, Water Enforcement and Compliance Assurance Branch
EPA Region 5
77 W. Jackson Blvd. (ECW-15J)
Chicago, Illinois 60604-3590

If you have any questions or concerns regarding this letter, or the inspection report, please contact Mr. Ellens at (312) 353-5562 or at ellens.newton@epa.gov.

Sincerely,

**MOLLY
SMITH**

 Digitally signed by
MOLLY SMITH
Date: 2023.09.07
09:37:51 -05'00'

Molly Smith
Section 1 Supervisor
Water Enforcement and Compliance Assurance Branch

Enclosure

cc: Christopher Walton, District Representative
Ohio Environmental Protection Agency
(via email)

Pretreatment Compliance Inspection: Eastern Ohio Regional Wastewater Authority, Bellaire, Ohio

Control Authority Name and Address

Eastern Ohio Regional Wastewater Authority
6000 North Guernsey Street
Bellaire, Ohio 43906

Responsible Official

Valerie Moore, Executive Director

Inspection Participants

Eastern Ohio Regional Wastewater Authority

Valerie Moore, Executive Director
Sarah MacFarland, Administrative Assistant
Chad Buksa, Plant Manager and Operator of Record

Vaughn, Coast and Vaughn, Inc.

Jeffrey Vaughn, P.E.

Ohio Environmental Protection Agency

Christopher Walton, Southeast District Representative, Division of Surface Water¹

EPA

Newton Ellens, Pretreatment Program Manager
Matthew Schulte, Physical Scientist
Jennifer Bush, Environmental Scientist

Inspector:

NEWTON

Inspector Signature: ELLENS

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NEWTON ELLENS
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Report Date: _____

Approver Name & Title: MOLLY

Approver Signature SMITH

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Date: 2023.09.07
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Approval Date: _____

¹ Mr. Walton was present for the first day of the inspection.

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ATTACHMENT I: PHOTO LOG

ATTACHMENT II: LIST OF DOCUMENTS RECEIVED DURING INSPECTION

SECTION 1.0: INTRODUCTION

The U.S. Environmental Protection Agency conducted a Federal Pretreatment Compliance Inspection (PCI) of the Eastern Ohio Regional Wastewater Authority (EORWA or Authority) from June 27 to 29, 2023. The purpose of the inspection was to evaluate the procedures and implementation of the Authority's pretreatment program. EORWA has a National Pollutant Discharge Elimination System (NPDES) Permit—Permit No. OH0049999 (Permit OH0049999). Part II.Z. of Permit OH0049999 states that EORWA's pretreatment program initially approved on May 30, 2006, and all subsequent modifications approved before the effective date of this permit, shall be an enforceable term and condition of the permit. EPA's inspection consisted of:

1. Review of requested submittals prior to on-site inspection;
2. Interviews and discussion with EORWA staff and Vaughn, Coast and Vaughn, Inc. staff;
3. Industrial User (IU) file reviews; and
4. A site visit at one IU: Arrowstrip, Inc.

On June 27, 2023, inspectors Newton Ellens, Matthew Schulte, and Jennifer Bush arrived at the EORWA wastewater treatment plant at 6000 North Guernsey Street, Bellaire, Ohio. They met Ms. Moore and MacFarland, and Messrs. Buksa and Walton. EPA inspectors presented their credentials and began the inspection.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

EORWA has one wastewater treatment plant (EORWA WWTP). It has a design flow rate of 5.0 million gallons per day (MGD) and an actual flow rate of 3.80 MGD. The WWTP has two treatment levels:

1. Primary—grit and screening removal and primary clarification;
2. Secondary—aeration and secondary clarification; and
3. Tertiary—disinfection.

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

A. Pretreatment Program Modification:

Under its current NPDES Permit, EORWA must conduct a local limits justification to determine the adequacy of its local limits.

B. Legal Authority:

The Authority receives wastewater from five entities:

1. Village of Bellaire,
2. Village of Brookside,
3. Village of Bridgeport,
4. City of Martins Ferry, and
5. Belmont County Sanitary Sewer District (Belmont County SSD).

EORWA has issued interjurisdictional agreements to each of these contributing jurisdictions. However, these agreements do not address how EORWA must implement its pretreatment program within those contributing jurisdictions.

Belmont County SSD's wastewater flows to one of two wastewater treatment plants. Wastewater generated west of the Ohio River Valley flows to Belmont County's SSD wastewater treatment plant. Wastewater generated east of the Ohio River Valley flows to the EORWA WWTP.

EORWA is a district. The mayors of Bellaire, Brookside, Bridgeport, and Martins Ferry each select a representative to sit on EORWA's board.

EORWA has updated its sewer use ordinance (SUO) to reflect changes in the General Pretreatment Regulations. However, EORWA did not know if its contributing jurisdictions had updated their SUOs in a consistent manner.

C. IU Characterization:

The Authority defines significant industrial users (SIUs) in Section 1.4.CC of its Industrial Pretreatment Resolution (EORWA's SUO). The definition is similar to the definition in 40 C.F.R. § 403.3(v). In addition, EORWA splits SIUs into two categories. Major SIUs use chemicals, while Minor SIUs do not.

Regarding industrial waste survey activities: The Authority (1) inspects new businesses and (2) reviews consumption reports to determine whether it should issue permits to industries. In addition, EORWA's contributing jurisdictions inform the Authority about new businesses. Finally, the Authority monitors the Belmont County real estate website for new businesses. However, EORWA does not document its industrial waste survey activities.

EORWA identifies substantial changes in wastewater discharges from existing industries by sampling those industries and reviewing self-monitoring reports.

Currently, the Authority has seven permitted SIUs: two categorical IUs and five non-categorical IUs. One of the non-categorical IUs (Belmont Community Hospital) has shut down. EORWA stated that the hospital's IU permit will expire in October 2023.

D. Hauled Waste:

The Authority accepts loads of sludge or fats, oils, and grease (FOG) via truck. EORWA used to accept leachate from a landfill in Alliance Ohio. According to the Authority, in May 2023, the Authority stopped accepting this leachate because of foaming and radiation concerns. EORWA does not permit waste haulers; however, the Authority requires potential haulers to test its waste before it is accepted. EORWA's SUO does not give EORWA the discretion to refuse hauled waste.

E. Application of Pretreatment Standards and Requirements:

Under Section 2.4 of the Authority's SUO:

- Each IU with an IU permit is subject to concentration limits written in that permit;
- For each pollutant parameter with an IU permit limit, EORWA's Operation Manager shall compare any applicable categorical limit to the local limit, and apply the most stringent limit;

The Authority has set local limits for the following pollutants:

- Arsenic,
- Cadmium,
- Hexavalent chromium,

- Chromium,
- Copper,
- Lead,
- Mercury,
- Molybdenum,
- Nickel,
- Selenium,
- Silver,
- Zinc, and
- Cyanide.

EORWA uses a uniform allocation for local limits.

F. Compliance Monitoring:

The Authority is required to conduct annual SIU inspections under its pretreatment program. However, EORWA may use its discretion to inspect SIUs twice per year. EORWA inspects each SIU's process areas, pretreatment facilities, chemical storage areas, and spill prevention equipment. EORWA will also review SIU records.

The Authority typically samples Major SIUs three times per year; Minor SIUs are sampled annually. EORWA uses a contract laboratory (Ream and Haagar) to conduct sample analysis. The Authority does not collect pH samples for SIUs. However, EORWA does conduct pH sampling for waste haulers.

Regarding slug control plans: The Authority requires all Major SIUs to have a slug control plan. Also, the Authority evaluates each Minor SIU to determine whether it needs a slug control plan.

G. Enforcement:

There are discrepancies in the definition of "significant noncompliance," (SNC) between 40 C.F.R. § 403.8(f)(2)(viii) and the SUO:

- Under 40 C.F.R. § 403.8(f)(2)(viii)(A) and (B), chronic or technical review criteria violations are exceedances of pretreatment standards that represent a certain percentage of all measurements taken for the same pollutant parameter during a six-month period. However, under the corresponding criteria in the SUO, a chronic or technical review criteria violation is any exceedance of pretreatment standards that occurs during a six-month period. Therefore, EORWA defines any pretreatment limit exceedance as SNC.
- SNC under 40 C.F.R. § 403.8(f)(2)(viii)(D) is any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority. However, under the corresponding criteria in the SUO, SNC is any discharge of pollutants that have caused imminent endangerment to the public or to the environment or have resulted in EORWA's exercise of its emergency authority.

Since January 1, 2022, none of EORWA's SIUs have been in SNC.

EORWA developed its enforcement response plan (ERP) in 2015. Under the Authority's ERP, EORWA issued a November 17, 2021, Notice of Violation to United Dairy for storing containers of chemicals near an outside manhole.

H. Data Management/Public Participation:

Regarding confidential information: Section 11 EORWA's IU permits state:

Information furnished by an industrial user to EORWA shall be available to the public or other governmental agency without restriction, unless the user demonstrates that the release of such information would endanger its competitive position. Upon the request of the discharger that is furnishing the report, portions of the report which may disclose trade secrets or secret processes shall not be made available for inspection by the public but shall be made available upon written request to governmental agencies for uses related to this Permit, the NPDES permit and/or the pretreatment programs. Wastewater constituents and characteristics shall not be recognized as confidential information. Information accepted by EORWA as confidential shall not be transmitted to any governmental agency by EORWA until and unless a ten-day notification is given to the discharger.

Regarding request by the public to review IU files: EORWA usually turns public information requests around in one week.

The Authority ensures public participation during revisions to the SUO and/or local limits by adding these topics to (1) EORWA board meeting agendas and (2) EORWA's webpage.

EORWA typically retains pretreatment documents for five to seven years.

I. Resources:

EORWA has a \$3,000 budget to implement the pretreatment program. EORWA bills its SIUs to fund the program.

Various EORWA staff have pretreatment responsibilities. The Authority has not determined the number of personnel (in full time employee) responsible for implementing the pretreatment program.

EORWA has two composite samplers at its disposal and plans to acquire two more samplers.

EORWA uses flow data provided by IUs. IUs do not have flow monitoring equipment on site.

J. Environmental Effectiveness/Pollution Prevention

The Authority has evaluated current and historical pollutant loading data. Data has shown that metals loadings have decreased over the past ten to 15 years. EORWA stated that the decrease is due to shuttered IUs—not necessarily EORWA's pretreatment program.

SECTION 4.0: FILE REVIEWS

4.1 IU Identification

IU Name	IU Type	Avg total flow (gpd)	Avg process flow (gpd)	Visited During Audit?	Reviewer	Categorical Pretreatment Standard
Turf Care Supply Corp.	CIU	10,622	32	No	Newton Ellens	40 CFR PART 455 PESTICIDE CHEMICALS
United Dairy Inc.	Non-Categorical SIU	86,000	86,000	No	Matthew Schulte	N/A
Arrowstrip, Inc.	CIU	9,600	8,400	Yes	Jennifer Bush	40 CFR PART 420 IRON AND STEEL MANUFACTURING POINT SOURCE CATEGORY
East Ohio Regional Hospital	Non-Categorical SIU	9,492	varies	No	Newton Ellens	N/A
Nickles Bakery, Inc.	Non-Categorical SIU			No	Jennifer Bush	N/A
City of Martins Ferry Water Treatment Plant	Non-Categorical SIU	100,000	100,000	No	Matthew Schulte	N/A

4.2 Facility Information

Turf Care Supply Corp.
100 Picoma Road
Martins Ferry, Ohio 43935

Turf Care Supply Corp. (Turf Care) is a manufacturer of fertilizer products for the agricultural and greens industry. The main process includes the mixing and blending of fertilizer products for control (pesticides and herbicides) and non-control products (e.g., nitrogen, phosphorous, potassium, or NPK fertilizers) and bagging the material into consumer bags and super sacks for use. Additionally, Turf Care coats urea fertilizer with sulfur and wax or a polymer (sulfur and wax technology), depending on the product. According to the IU permit application, the IU was established at its present location in 1987.

United Dairy Inc.
300 North 5th Street
Martins Ferry, Ohio 43935

United Dairy, Inc. (United Dairy) is a non-categorical industrial user that produces wastewater from the following sources: non-contact cooling water, boiler feed, process/operation, plant/equipment cleaning, and water generated from product. United Dairy has batch discharges and continuous discharges. They have one monitoring location designated in their IU permit as manhole 001. United Dairy performs a batch discharge at a frequency of twenty-eight times a day with an average flow rate of 180 gallons per minute for a daily flow of 70,000 gallons per day (gal/day). They continuously discharge twenty-four hours a day, seven days a week, at a rate of 180 gallons an hour for a daily flow rate of 70,000 gal/day. United Dairy performs a pH neutralization on their wastewater by adding sulfuric acid until the wastewater reaches within the pH range of six to nine.

Arrowstrip, Inc.
100 South First Street PO Box 37
Martins Ferry, Ohio 43935

Arrowstrip, Inc. (Arrowstrip) is an operation focused on slitting and galvanizing steel strips. At the Primary Slitter, 48" coils of steel are slit into narrower bands. These bands are used at the secondary slitting and galvanizing operation. Non-contact cooling water is used on the primary slitter brake/clutch mechanism. The bands from the primary slitter are moved to the entry end of the secondary slitting and galvanizing operation. Each band is placed on an un-coiler and fed through the mashed seam, welder, the overhead accumulator, secondary slitter, muriatic acid pickle tank, acid rinse tank, ammonium chloride flux tank, galvanizing kettle, two water cooling tanks, post treatment tank, hot air dryer, and into the recoiling operation. Treatment used for each waste stream prior to discharge includes filtration-galvanize quench, sedimentation-galvanize quench, and neutralization - pickle rinse. The facility discharges both continuously and in batches. The acid neutralizer, galvanize quench, and primary slitter are continuous discharges, and the restrooms are batch discharged. There are two outfalls to the sewer system.

East Ohio Regional Hospital
90 N. Fourth Street
Martins Ferry, Ohio 43935

The East Ohio Regional Hospital is a health care provider with 110 beds.

Nickles Bakery, Inc.
1000 Broadway Street
Martins Ferry, Ohio 43935

Nickles Bakery, Inc. (Nickles Bakery) is a manufacturer of hamburger and hot dog buns and loaf bread. It also serves as distribution for other bakery products. The IU monitors discharges from a sump pit and system sampling. The bakery monitors number and frequency of reclaim tank discharge. The IU discharges in batches. The batch discharges occurs two times a week, at an average of 600 gallons per release. There is one outfall to the sewer system.

City of Martins Ferry Water Treatment Plant
400 North 1st Street
Martins Ferry, Ohio 43935

City of Martins Ferry Water Treatment Plant (Martins Ferry Water Treatment Plant) performs a batch discharge to EORWA twice per day for a total volume of 100,000 gal/day. Water is pulled from a private well at approximately 65 Mgal/month which then gets treated at the plant. The treatment processes at the plant are ozonation and filtration. There is one permitted outfall (001) which is labelled as the backwash drain vault.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism

Statement of Non-transferability

The Turf Care, East Ohio Regional Hospital, Nickles Bakery and Martins Ferry Water Treatment Plant IU permits contain a non-transferability section. This section, however, does not require each IU to provide a copy of the IU permit to the new owner or operator.

Applicable effluent limits (local limits, categorical standards, Best Management Practices)

For Arrowstrip, Nickles Bakery, and Martins Ferry: The IU permit references local limit pollutant parameters from the SUO and Industrial Pretreatment Resolution but does not include them. For example: Ammonia and Oil and Grease are referenced in the Industrial Pretreatment Resolution document, but limits are not listed in the IU permits.

For East Ohio Regional Hospital: The IU permit does not have a local limit for ammonia.

Self-monitoring requirements

Process for seeking a waiver for pollutant that are not present nor expected to be present

For Arrowstrip: The IU permit does not include a description of a process the IU can take to seek a self-monitoring waiver for pollutants that are not present nor expected to be present.

Sampling frequency

For East Ohio Regional Hospital: the IU permit only has annual sampling requirements.

Sampling locations/discharge points

For East Ohio Regional Hospital - The listed sample location is "manhole on Dewey Street--001." This is not a clear sample location.

For City of Martins Ferry Water Treatment Plant – The sampling stations location is unclear.

Sample types (grab or composite)

For Turf Care and East Ohio Regional Hospital – The self-monitoring requirements section of these IU permits state “The method of collection shall be by either flow proportioned automatic composite sampler or by a single grab sample.” There is not specification of the required sample type for each pollutant sampled.

For Turf Care Supply Corp. and East Ohio Regional Hospital - The permits have composite sample requirements for cyanide. Also, the permit has flow-proportional composite sampling requirements, but the permits do not state that flow-proportional composite sample must have a 24-hour duration.

For Arrowstrip and Nickles Bakery – The composite sample requirement in these permits does not clarify if composite samples should have a 24-hour duration.

For the alternative sample type requirements listed above, the IU files do not include documentation of EORWA’s decision to allow the alternative sampling (including a determination that samples are representative of the discharge).

Reporting requirements (including all monitoring results)

Turf Care and East Ohio Regional Hospital - The permits require the IUs to submit self-monitoring reports to Michael D. Dobbs. Mr. Dobbs, however, no longer works for EORWA.

Record-keeping requirements

For Turf Care and East Ohio Regional Hospital – The records retention section of the IU permits do not:

- Require the IUs to make records available for inspection and copying by the Ohio Environmental Protection Agency and EPA;
- Extend the period of record retention during the course of any unresolved litigation regarding the discharge of pollutants by the IUs or when requested the EPA.

Requirements to control slug discharges; determined by the POTW to be necessary

For Turf Care Supply Corp. - The permit states that the IU may be subject to a slug discharge control plan. The permits does not require compliance with a specific slug discharge control plan.

B. Application of IU Pretreatment Standards:

IU Categorization

Calculation and application of categorical standards

Turf Care Supply Corp. – The IU permit references 40 C.F.R. § 455.46. Under this regulation, there shall be no discharge of process wastewater pollutants. However, the IU permit states, “Dicamba and 2,4-D are used as surrogate parameters for PAIs (pesticide active ingredients) in the process wastewater

discharge. A combined total of measured surrogate PAI concentrations at or above 200 µg/L (using the most sensitive approved analytical procedure) shall be considered a “discharge of process wastewater pollutants” under 40 CFR § 455.46 (b) and violate the “no process wastewater discharges of PAIs” provision of this permit. Therefore, the IU permit would allow the IU to discharge a combined total of measured surrogate pesticide active ingredients at concentrations below 200 µg/L, in violation of 40 C.F.R. § 455.46.

Arrowstrip, Inc. – The daily mass limits may be calculated incorrectly. The IU permit states that the acid neutralization tank is subject to 40 CFR § 420.95 (a)(1), a subpart applicable to existing sources. However, according to the IU, operations began in 1986, after the New Source Date for 40 CFR 420 Subparts E-F, H-J, L which is January 7, 1981. Additionally, according to Arrowstrip, the production and flow rate has significantly changed in recent years.

Classification by category/subcategory

Arrowstrip, Inc. - The permit states the pickle rinse/acid neutralization tank is subject to 40 CFR § 420.95 (a)(1). However, the tank uses hydrochloric acid in the pickling process. These characteristics are consistent with a facility subject to 40 CFR § 420.96 (b)(1).

Classification as new/existing source

Turf Care Supply Corp. - The permit does not classify the IU as a new or existing source.

Arrowstrip, Inc. – The new source date for 40 CFR Part 420, Subparts E-F, H-J, L is January 7, 1981. The IU is listed as existing source; however, the IU opened in 1986.

Application of limits for all regulated pollutants

Arrowstrip, Inc.:

- The IU permit does not include a categorical mass limit for hexavalent chromium.
- The local limit is not more stringent than the apparent categorical limit for hexavalent chromium. However, the IU permit includes a local limit for hexavalent chromium, instead of a categorical limit.

C. CA Compliance Monitoring

EPA reviewed five years of records. A summary of EPA’s observations is provided below:

Sampling (once a year, except as otherwise specified)

Nickles Bakery, Inc. – The IU files include sampling documentation for 2023, 2022, and 2020. However, there is no documentation of sampling conducted in 2021.

Analysis for all regulated parameters

Turf Care Supply Corp. - The POTW did not collect any ammonia samples, for reports dated 5/30/23, 12/28/22 and 12/22/22, 5/16/22, 11/3/21, 7/7/21, and 10/5/20.

United Dairy Inc. – EORWA’s sample analysis results do not include pH results.

Arrowstrip, Inc. – EORWA’s sample analysis results do not include results for pH, ammonia, or oil and grease.

East Ohio Regional Hospital – EORWA's sample analysis reports do not include pH results.

Nickles Bakery, Inc. – EORWA’s sample analysis results do include pH, ammonia, iron, or sulfate results.

Martins Ferry Water Treatment Plant - Some regulated parameters contained in the local limits not included in sampling events (e.g., ammonia and oil and grease).

Appropriate sampling techniques and analytical methods (40 CFR Part 136)

United Dairy Inc. – EORWA did not analyze pH samples within 15 minutes of each grab sample taken.

Arrowstrip, Inc. – EORWA’s composite sample analysis data does not specify that samples were collected over a 24-hour period.

East Ohio Regional Hospital - The chain of custody form associated with the 5/5/22 sample analysis report does not indicate the sample temperature. Under 40 CFR Part 136, cyanide, hexavalent chrome, and fats, oils, and grease samples must be preserved at 6 degrees Celsius or below. Also, the POTW collected a composite sample for cyanide.

Nickles Bakery, Inc. - EORWA’s composite sample analysis data does not specify that samples were collected over a 24-hour period. Also, EORWA took composite samples for cyanide.

Martins Ferry Water Treatment Plant - EORWA took composite samples for cyanide.

Inspection (once a year, except as otherwise specified)

Arrowstrip, Inc. - EORWA’s IU files did not include reports for inspections completed in 2019 or 2020.

Nickles Bakery, Inc. – EORWA’s IU files did not include reports for inspections completed in 2020.

City of Martins Ferry Water Treatment Plant – The IU file did not include an inspection report from 2020.

Documentation of inspection activities

United Dairy Inc. – The annual inspection for 2021 was performed on October 26, 2021. However, the last page of the inspection report was dated 7/14/2022.

Arrowstrip, Inc. – The date on the July 6, 2022, inspection report is covered with white out. Also, sections of the December 29, 2022, inspection report are covered with white out.

D. CA Enforcement Activities

Identification of discharge violations

Arrowstrip, Inc. – There is no documentation of EORWA’s response to IU violations of the pH limit in 2021 and 2020.

Identification of monitoring/reporting violations

East Ohio Regional Hospital - The IU's latest self-monitoring reports are from 10/9/18. (Note: the hospital closed in 2020 but re-opened in June 2021.) There is no documentation of the POTW identifying these reporting violations with the IU.

Nickles Bakery, Inc. – The IU has not submitted a complete analysis of all the required parameters in any self-monitoring reports from the last 3 years. There is no documentation of the POTW identifying these reporting violations with the IU.

Identification of compliance schedule violations

Arrowstrip, Inc. – On November 17, 2021 - EORWA transmitted a NOV to the IU, requiring it to submit a plan of action for approval. The IU responded with plan of action and photograph. EORWA, however, has no documentation of any response to the IU’s submittal.

Calculation of SNC

According to the Authority’s ERP, any effluent violation within a six-month period triggers an SNC designation. However, EORWA did not designate Arrowstrip to be in SNC for pH limit violations in 2021 and 2020.

Publication of SNC

East Ohio Regional Hospital - EORWA did not publish the hospital for failure to submit self-monitoring reports.

E. IU Compliance Status

Sampling by IU at frequency specified in control mechanism/regulations

Arrowstrip, Inc. – The IU permit requires the IU to sample three times per year. However, the IU only sampled once in 2022 (in December 2022).

East Ohio Regional Hospital - The latest sample analysis results are from October 9, 2018. (Note: the hospital closed in 2020 but re-opened in June of 2021.)

Analysis by IU of all required pollutants in accordance with appropriate sampling techniques and analytical methods

Arrowstrip, Inc. - Multiple contaminants of concern are not completed, making it unclear if sample analysis is accurate for all parameters (including pH). For example, sample times are not listed in May 2023, December 2021, and August 2021. Also, all listed lab reports do not indicate if samples are grab or composite.

East Ohio Regional Hospital - The 10/9/18 self-monitoring report does not include cyanide results.

Martins Ferry Water Treatment Plant – The IU self-monitoring records do not show that the IU monitored for oil and grease and ammonia.

Reporting by IU on all required pollutants

Turf Care Supply Corp. - The IU self-monitoring reports do not include maximum daily flow rates.

Arrowstrip, Inc. - Some samples do not include all required pollutants (ex: December 2022 sample set shows cyanide on the chain of custody (COC), however, no cyanide results are available).

Nickles Bakery, Inc.:

- pH analysis not shown in 9/20/20 self-monitoring report.
- Self-monitoring reports from 6/17/21, 3/24/21, 9/22/20, 6/24/20, and 3/23/20 do not include analysis of cyanide.
- None of the self-monitoring reports included analysis of ammonia.
- None of the self-monitoring reports include analysis of iron.
- None of the self-monitoring reports include analysis of sulfate.

City of Martins Ferry Water Treatment Plant - Reports do not include parameters for oil and grease and ammonia.

Submission by IU of compliance schedule reports by required dates

United Dairy Inc. – The IU permit requires self-monitoring reports to be submitted no later than the fifteenth day of January, May, and September. The September report, however, was dated on 9/22/22.

Arrowstrip, Inc. - It does not appear the IU is submitting the self-monitoring analysis no later than the 15th day of January, May, and September, as required by the permit. (ex: letters from IU with enclosed reports dated January 28, 2022, and October 19, 2022).

IU notification and resampling after of becoming aware of discharge violations

Arrowstrip, Inc. – The IU did not notify the POTW of a pH discharge violation within 24 hours of

receiving the corresponding lab report (dated 2/3/2021). Also, there is no documentation showing that it resampled within 30 days of becoming aware of the violation.

IU submission/implementation of slug discharge control plan

Nickles Bakery, Inc. – The IU’s slug discharge control plan does not include a description of discharge practices.

Notification by IU of significant changes in discharge

Turf Care Supply Corp. - A 11/15/21 self-monitoring reports indicates an average flow rate of 41,575 gallons per day (gpd), while an 11/12/20 self-monitoring report indicates an average flow rate of 17,100 gpd. Despite the differences in flow rates, Turf Care did not notify EORWA about the change in flow.

East Ohio Regional Hospital - A report of a 7/6/22 EORWA inspection states that the average daily water use is 14,657 gpd. However, a report of a 12/2/21 inspection states that the average daily water use is 8,000 gpd. The IU did not submit a notification of a significant change in discharge.

Noncompliance with reporting requirements (but not SNC)

Arrowstrip, Inc. - IU does not consistently submit self-monitoring reports no later than the 15th of January, May, and September, as required by the permit. Additionally, the IU does not complete all required sampling (3 times per year is required in the permit). The flow is not included in the report, as required in the reporting requirements section of the permit. It appears the IU has submitted tables of results, but not every COC, as required by the permit. Due to missing elements of the COC, EPA could not identify if all parameters are analyzed in accordance with EPA-approved procedures (e.g., pH).

Nickles Bakery, Inc. - Not all parameters were sampled for in the self-monitoring reports. (e.g., ammonia, cyanide, iron, sulfate, pH).

Noncompliance with discharge limits (but not SNC)

Arrowstrip, Inc.: EORWA did not take an enforcement action against Arrowstrip for effluent limit violations listed below. In addition, EORWA did not take an enforcement action against Arrowstrip, in cases where Arrowstrip failed to (1) notify EORWA about an effluent limit violation, and (2) repeat sampling and analysis, and (3) submit the results of the repeat analysis within 30 days of becoming aware of the violation:

- EORWA sampling event on 5/27/21 shows nickel result at 0.838 mg/l (the effluent limit is 0.5 mg/l).
- IU Self-Monitoring event on 8/20/2020 shows pH result of 5.92 (the minimum pH limit is 6.0).
- IU Self-Monitoring event on 1/18/2021 shows pH result of 5.89.

Significant Noncompliance

SNC for failure to provide, within 45 days after the due date, required reports.

Arrowstrip, Inc. – The IU permit requires self-monitoring reports no later than the 15th day of January, May and September. IU submitted self-monitoring report on June 30, 2022 (46 days after due date).

East Ohio Regional Hospital - The latest sample analysis results are from 10/9/18. (Note: the hospital closed in 2020 but re-opened in June 2021).

Nickles Bakery, Inc. - It is not clear when the self-monitoring reports were provided to the POTW, as there are no letters/certifications to the POTW (only the lab reports are provided).

SECTION 5.0: INDUSTRIAL USER SITE VISIT

Arrowstrip, Inc.

310 S 1st St.

Martins Ferry, Ohio 43935

Date of site visit: June 29, 2023

Inspection Participants:

Arrowstrip, Inc:

Terry Deusz, Vice President

Marsha Surgent, Plant Manager

EORWA

Chad Buksa, Plant Manager

Sarah Macfarland, Administrative Assistant and Pretreatment Coordinator

Coast and Vaughn, Inc.

Jeff Vaughn, Engineer

EPA

Newton Ellens, Pretreatment Program Manager

Jennifer Bush, Environmental Scientist

Matthew Schulte, Physical Scientist

EPA, EORWA, and Coast and Vaughn, Inc. arrived at Arrowstrip, Inc. (Arrowstrip or Facility) at approximately 8:57 AM EDT and were met at the front by Terry Deusz (Vice President) and Marsha Surgent (Plant Manager). EPA staff showed Arrowstrip their credentials and began the Opening Conference. Coast and Vaughn, Inc. took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA and EORWA by Arrowstrip staff:

- General Plant Information:
 - Operations began in 1986.
 - There are currently 12 employees, but Arrowstrip is looking to hire and have a total of 15 employees.

- There is only one shift currently running per day, lasting 12 hours, Monday - Thursday. There is occasionally one midnight shift added to prepare for the next day, depending on product demand. Some employees may work Fridays for overtime, if it is needed and staff are available.
- Manufacturing Process:
 - Arrowstrip ships in dry coils – typically aluminium and steel, but currently only receiving steel. The facility uses hydrochloric acid in order to galvanize. The end product is galvanized zinc coated steel.
 - The process begins with the primary slitter. The primary slitter cuts the dry coils in differing sizes based on customer needs. The primary slitter uses about 6000 gal/day of water for cooling due to the friction in the process. This contact cooling water is discharged to the floor drain.
 - The secondary slitter slices the coils into smaller pieces prior to going to the hydrochloric acid/pickle tank area.
 - For the pickle rinse, a mixture of hydrochloric acid and ammonia chloride is used to prepare for the flux.
 - After the pickle rinse, the sodium chloride is used in the flux to prepare for the galvanization process. Following the flux, coils proceed to the galvanizing kettle.
 - There is a cooling rinse tank used (contact cooling water) in the galvanization process. The galvanizing process is approximately 4000 gal/day.
 - Typically, about 9,900 gal/day of water is used and discharged; however, Arrowstrip estimates it may be closer to about half of that currently, due to shift changes within the last month.
 - Arrowstrip is currently producing about 350-400 tons a month of coils, which is consistent with the production rate of last year (2022). In previous years, the total production was closer to 900 tons a month.
- Waste Generation:
 - Zinc dust is considered the only residuals produced from the process line. The zinc dust is collected in filters and recycled for credits. The zinc is typically sent back to be recycled two times per month, but could be three or four times, if production is up.
 - Waste oils are collected in a 55-gallon drum. Approximately one drum is collected in a year and hauled offsite.
- Pretreatment:
 - The overflow of the pickle rinse is fed into a tank and a 55-gallon drum bleeds sodium hydroxide in for pH adjustment. This modulates based on the pH of the overflow. The pH probe is calibrated yearly. Sodium hydroxide is used in order to neutralize. This is typically about 1,500 gal/day.
 - There is no pretreatment prior to the galvanize rinse tank. Arrowstrip noted this is because the galvanizing rinse is just used for cooling. However, there are filters to collect zinc dust.
- Wastewater Sampling:
 - There are two sampling locations at Arrowstrip – one at the end of the pickle rinse and another at the rinse tank after the galvanization.
 - There are no flow meters within the system or prior to being discharged. The gallons per day per sample point is estimated by the facility. Arrowstrip estimates it would be similar to water intake due to the lack of water loss throughout the process.

- Composite samples are taken over a period of 24 hours.

Plant Walk Through

Arrowstrip staff showed EPA inspectors and EORWA staff the following during the plant walkthrough:

- Beginning product (coils)
 - All coils brought in by Arrowstrip are dry/have no product on them.
- Primary Slitter
 - The used contact cooling water is discharged to the floor drain.
- Secondary Slitter
- Pickle Rinse
 - EPA observed eleven 15-gallon containers of hydrochloric acid near the pickle rinse line.
- Flux
 - Uses sodium chloride to prepare product for galvanization.
- Galvanize Kettle/Process
- Cooling Rinse Tank
- Sampling Locations:
 - End of Pickle Rinse
 - Sample is collected after the sodium hydroxide is used for pH adjustment.
 - Rinse Tank after Galvanization

Records Review

EPA staff reviewed laboratory reports from self-monitoring and EORWA sampling prior to the site visit.

Closing Conference

EPA and EORWA staff completed the site walk through at 11:00 AM EDT. No closing conference was held at Arrowstrip.

SECTION 6.0: SUMMARY OF FINDINGS

During the closing, EPA asked if EORWA had reviewed and modified its pretreatment program to minimize the impact of nondomestic discharges from combined sewer overflows (one of the nine minimum controls). EORWA responded that it had not, but it had maximized the use of the collection system for storage of wet weather flow.

A. Areas of Concern

40 C.F.R. §	Site Background & Inspection Observations	Report Section
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403.8(f)(1)	EORWA has issued interjurisdictional agreements to the Villages of Bellaire, Brookside, and Bridgeport; the City of Martins Ferry; and the Belmont County Sanitary Sewer District. However, these agreements do not address how EORWA must implement its pretreatment program within those contributing jurisdictions. EORWA has updated its SUO to reflect changes in the General Pretreatment Regulations. However, EORWA did not know if its contributing jurisdictions had updated their SUOs in a consistent manner.	3.0 B.
403.8(f)(1)(i)	EORWA's SUO does not give EORWA the discretion to refuse hauled waste.	3.0 D.
403.8(f)(2)(i)	The Authority (1) inspects new businesses and (2) reviews consumption reports to determine whether it should issue permits to industries. In addition, EORWA's contributing jurisdictions inform the Authority about new businesses. Finally, the Authority monitors the Belmont County real estate website for new businesses. However, EORWA does not document its industrial waste survey activities.	3.0 C.
40 C.F.R. §	File Reviews	Report Section
403.8(f)(1)(iii)(B)(2)	The Turf Care, East Ohio Regional Hospital, Nickles Bakery and Martins Ferry Water Treatment Plant IU permits contain a non-transferability section. This section, however, does not require each IU to provide a copy of the IU permit to the new owner or operator.	4.3 A.
403.8(f)(1)(iii)(B)(3)	For Arrowstrip, Nickles Bakery, and Martins Ferry: The IU permit references local limit pollutant parameters from the SUO and Industrial Pretreatment Resolution but does not include them. For example: Ammonia and Oil and Grease are referenced in the Industrial Pretreatment Resolution document, but limits are not listed in the IU permits. For East Ohio Regional Hospital: The IU permit does not have a local limit for ammonia. Turf Care Supply Corp. – The IU permit references 40 C.F.R. § 455.46. Under this regulation, there shall be no discharge of process wastewater pollutants. However, the IU permit states, "Dicamba and 2,4-D are used as surrogate parameters for PAI's (pesticide active ingredients). In the process wastewater discharge. A combined total of measured surrogate PAI concentrations at or above 200 µg/L (using the most sensitive approved analytical procedure) shall be considered a "discharge of process wastewater pollutants" under 40 CFR Part 455.46 (b) and violate the "no process wastewater discharges of PAIs" provision of this permit. Therefore, the IU permit would allow the IU to discharge a combined	4.3 A.

	total of measured surrogate pesticide active ingredients at concentrations below 200 µg/L, in violation of 40 C.F.R. § 455.46. Arrowstrip, Inc. – The daily mass limits may to be calculated incorrectly. It appears the IU permit states that the acid neutralization tank is subject to 40 CFR § 420.95 (a)(1), a subpart applicable to existing sources. However, according to the IU, operations began in 1986, after the New Source Date for 40 CFR 420 Subparts E-F, H-J, L which is January 7, 1981. Additionally, according to Arrowstrip, the production and flow rate has significantly changed in recent years.	
403.8(f)(1)(iii)(B) (4) and (6), 403.12(g)(3), and 403.12(o)(3)	For Arrowstrip: The IU permit does not include a description of a process the IU can take to seek a self-monitoring waiver for pollutants that are not present nor expected to be present. For East Ohio Regional Hospital - The listed sample location is "manhole on Dewey Street--001." This is not a clear sample location. For City of Martins Ferry Water Treatment Plant – The sampling stations location is unclear and needs more description. For Turf Care and East Ohio Regional Hospital – The self-monitoring requirements section of these IU permits state “The method of collection shall be by either flow proportioned automatic composite sampler or by a single grab sample,” instead of specifying the required sample type for each pollutant sampled. For Turf Care Supply Corp. and East Ohio Regional Hospital - The permits have composite sample requirements for cyanide. Also, the permit has flow-proportional composite sampling requirements, but the permits do not state that flow-proportional composite sample must have a 24-hour duration. For Arrowstrip and Nickles Bakery – The composite sample requirement in these permits does not clarify if composite samples should have a 24-hour duration. For the alternative sample type requirements listed above, the IU files do not include documentation of EORWA’s decision to allow the alternative sampling (including a determination that samples are representative of the discharge). Turf Care and East Ohio Regional Hospital - The permits require the IUs to submit self-monitoring reports to Michael D. Dobbs. Mr. Dobbs, however, no longer works for EORWA.	4.3 A.

	For Turf Care and East Ohio Regional Hospital – The records retention section of the IU permits do not: • Require the IUs to make records available for inspection and copying by the Ohio Environmental Protection Agency and EPA; • Extend the period of record retention during the course of any unresolved litigation regarding the discharge of pollutants by the IUs or when requested the EPA.	
403.12(h)	For East Ohio Regional Hospital: the IU permit only has annual sampling requirements.	4.3 A.
403.8(f)(1)(iii)(B)(6)	For Turf Care Supply Corp. - The permit states that the IU may be subject to a slug discharge control plan, instead of requiring compliance with a specific slug discharge control plan.	4.3 A.
403.8(f)(2)(iii)	Arrowstrip, Inc. • The permit states the pickle rinse/acid neutralization tank is subject to 40 CFR § 420.95 (a)(1). However, the tank uses hydrochloric acid in the pickling process. These characteristics are consistent with a facility subject to 40 CFR § 420.96 (b)(1). • Arrowstrip, Inc. – The new source date for 40 CFR Part 420, Subparts E-F, H-J, L is January 7, 1981. The IU is listed as existing source; however, the IU opened in 1986. • The IU permit does not include a mass limit calculation for hexavalent chromium. • The local limit is not more stringent than the apparent categorical limit for hexavalent chromium. However, the IU permit includes a local limit for hexavalent chromium, instead of a categorical limit. Turf Care Supply Corp. - The permit does not classify the IU as a new or existing source.	4.3 B.
403.8(f)(2)(v)	Nickles Bakery, Inc.: • The IU files include sampling documentation for 2023, 2022, and 2020. However, there is no documentation of sampling conducted in 2021. • EORWA’s sample analysis results do include pH, ammonia, iron, or sulfate results. • EORWA’s IU files did not include reports for inspections completed in 2020. Turf Care Supply Corp. - The POTW did not collect any ammonia samples, for reports dated 5/30/23, 12/28/22 and 12/22/22, 5/16/22, 11/3/21, 7/7/21, and 10/5/20. United Dairy Inc.: • EORWA’s sample analysis results do not include pH results.	4.3 C.

	- The annual inspection for 2021 was performed on October 26, 2021. However, the last page of the inspection report was dated 7/14/2022. Arrowstrip, Inc.: - EORWA's sample analysis results do not include results for pH, ammonia, or oil and grease. - EORWA's IU files did not include reports for inspections completed in 2019 or 2020. East Ohio Regional Hospital - EORWA's sample analysis reports do not include pH results. Martins Ferry Water Treatment Plant - Some regulated parameters contained in the local limits are not included in sampling events. (e.g., Ammonia and oil and grease).	
403.8(f)(2)(vi)	Nickles Bakery, Inc. - Slug discharge control plan does not include a description of discharge practices.	4.3 E.
403.8(f)(2)(vii) and 403.12(g)(3)	Arrowstrip, Inc.: EORWA's composite sample analysis data does not specify that samples were collected over a 24-hr period. Nickles Bakery, Inc. - EORWA's composite sample analysis data does not specify that samples were collected over a 24-hr period. Also, EORWA took composite samples for cyanide. Martins Ferry Water Treatment Plant - EORWA took composite samples for cyanide.	4.3 C.
403.8(f)(5)	Arrowstrip, Inc. - The IU had exceedances of its pH limit in 2021 and 2020. However, there is no documentation of EORWA's response to these exceedances. - According to the Authority's ERP, any effluent violation within a six-month period triggers an SNC designation. However, EORWA did not designate Arrowstrip to be in SNC for pH limit violations in 2021 and 2020. - On November 17, 2021, EORWA transmitted a NOV to IU requiring plan of action approval by EORWA. The IU responded with plan of action and photograph. EORWA has no documentation of any approval of IU response. - Arrowstrip, Inc.: EORWA did not take an enforcement action against Arrowstrip for the following effluent limit violations: - EORWA sampling event on 5/27/21 shows nickel result at 0.838 mg/l (the effluent limit is 0.5 mg/l).	4.3 E.

	○ IU Self-Monitoring event on 8/20/2020 shows pH result of 5.92 (the minimum pH limit is 6.0). ○ IU Self-Monitoring event on 1/18/2021 shows pH result of 5.89. East Ohio Regional Hospital: • The IU's latest self-monitoring reports are from 10/9/18. (Note: the hospital closed in 2020 but re-opened in June 2021.) EORWA did not cite the hospital for failure to submit periodic monitoring reports. • East Ohio Regional Hospital - EORWA did not publish the hospital for failure to submit self-monitoring reports. Nickles Bakery, Inc. - IU has not submitted a complete analysis of all required parameters in any self-monitoring reports from last 3 years. There is no documentation of the POTW identifying these reporting violations with the IU.	
403.12(e)(1)	Arrowstrip, Inc.: • The IU permit requires sampling 3 times per year. However, the IU only sampled once in 2022 (in December 2022). • Some samples do not include all required pollutants (ex: December 2022 sample set shows Cyanide on COC, however, no Cyanide results are available). • It does not appear the IU is submitting the self-monitoring analysis no later than the 15th day of January, May, and September, as required by the permit. (ex: letters from IU with enclosed reports dated January 28, 2022, June 30, 2022, and October 19, 2022). • Flow data is not included in self-monitoring reports, as required in the reporting requirements section of the permit. • It appears the IU has submitted tables of results, but not every COC, as required by the permit. • Due to missing elements of the COC, it is not clear if all parameters are analyzed in accordance with EPA-approved procedures (e.g., pH). Turf Care Supply Corp. - The IU self-monitoring reports do not include maximum daily flow rates.	4.3 E.
403.12(g)(2)	Arrowstrip, Inc.: • No documentation from IU within 24-hrs of receiving lab report dated 2/3/2021 with pH discharge violation. • Arrowstrip, Inc. - No documentation from IU showing resampling within 30 days of knowledge of violation.	4.3 E.
403.12(g)(5)	United Dairy - EORWA did not analyze pH samples within 15 min of each grab sample taken.	4.3 C.

	East Ohio Regional Hospital - The chain of custody form associated with the 5/5/22 sample analysis report does not indicate the sample temperature. Under 40 CFR Part 136, cyanide, hexavalent chrome, and fats, oils, and grease samples must be preserved at 6 degrees Celsius or below. Also, the POTW collected a composite sample for cyanide.	
403.12(h)	East Ohio Regional Hospital - The 10/9/18 self-monitoring report does not include cyanide results. Martins Ferry Water Treatment Plant - Oil and grease and Ammonia are included in the local limits but are not being monitored. Nickles Bakery, Inc.: • pH analysis not shown in 9/20/20 self-monitoring report. • Self-monitoring reports from 6/17/21, 3/24/21, 9/22/20, 6/24/20, and 3/23/20 do not include analysis of Cyanide. • None of the self-monitoring reports included analysis of Ammonia. • None of the self-monitoring reports include analysis of Iron. • None of the self-monitoring reports include analysis of Sulfate. • It is not clear when the self-monitoring reports were provided to the POTW, as there are no letters/certifications to the POTW (only the lab reports are provided). United Dairy Inc. - Reports are to be submitted no later than the fifteenth day of January, May, and September following the acquisition of samples. September's report was dated on 9/22/22.	4.3 E.
403.12(j)	Turf Care Supply Corp. - A 11/15/21 self-monitoring reports indicates an average flow rate of 41,575 gpd, while a 11/12/20 self-monitoring report indicates an average flow rate of 17,100 gpd. Despite the significant differences in flow rates, Turf Care did not notify EORWA about the change in flow. East Ohio Regional Hospital - A report of a 7/6/22 EORWA inspection states that the average daily water use is 14,657 gpd. However, a report of a 12/2/21 inspection states that the average daily water use is 8,000 gpd. The IU did not submit a notification of a significant change in discharge.	4.3 E.
403.12(o)	Multiple COCs are not completed, making it unclear if sample analysis is accurate for all parameters (including pH). For example, sample times are not listed in May 2023, December 2021, August 2021, etc. All listed lab reports also do not include if samples are grab or composite.	4.3 E.

Permit OH0049999	File Reviews	Report Section
Part II.E.3)	During the closing, EPA asked if EORWA had reviewed and modified its pretreatment program to minimize the impact of nondomestic discharges from combined sewer overflows (one of the nine minimum controls). EORWA responded that it had not, but it had maximized the use of the collection system for storage of wet weather flow. This is another one of the nine minimum controls.	6.0

B. Program Recommendations

40 C.F.R. Part	File Reviews	Report Section
	Arrowstrip, Inc. – The date on the July 6, 2022, inspection report is covered with white out. Also, sections of the December 29, 2022, inspection are covered with white out.	4.3 C.