

October 14, 2026

Transmitted Electronically

Mayor and Council
City of Chillicothe
Municipal Building
35 South Paint Street
Chillicothe, Ohio 45601

**Re: Chillicothe WWTP-Easterly
Inspection
Inspection
NPDES
Ross County
OPD00003**

Subject: Ohio EPA NPDES Pretreatment Compliance Inspection

Dear Mayor and Council:

On August 10 and 11, 2026, Ohio EPA, Division of Surface Water conducted a Pretreatment Compliance Inspection (PCI) at the City of Chillicothe's Wastewater Treatment Plant (WWTP) located in Chillicothe, Ohio. Along with myself from Ohio EPA DSW's Southeast District Office, Eric Vannatter, Pretreatment Coordinator, was also present during the inspection.

The purpose of the inspection was to evaluate compliance with the pretreatment terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the approved Industrial Pretreatment Program (IPP) of the City of Chillicothe.

Findings:

1. Currently, the approved pretreatment program has control mechanisms for three significant industrial users (SIU) with all three being classified as noncategorical significant industrial users (NCSIU). In addition, there are also two noncategorical nonsignificant industrial users (NCNSIU), and two nonsignificant zero-discharging industrial users.
2. The current local limits were approved by Ohio EPA in August 2021.
3. Quarterly Industrial User Violation Reports have not been submitted since October 2025. The annual pretreatment reports for 2025 and 2026 were not submitted on or prior to June 15. Quarterly Industrial User Violation Reports received on September 25, 2026, which were due on January 15, 2026, and April 15, 2026, were deemed incomplete due to inaccuracy. To date, the Quarterly Industrial User Violation Report due on July 15, 2026, has not been received by Ohio EPA for review.

4. The Control Authority (CA) is in significant noncompliance (SNC) for violation of one or more Level I and II criterion, which is the failure to enforce Pretreatment Standards and reporting requirements and not submitting required reports within 30 days.
5. Howmet and Adena have expired control mechanisms (permits) and Adena has not submitted an industrial waste survey questionnaire for review.
6. The following observations were made by Ohio EPA during the Herr's file review:
 - a. Completed chain of custody forms were not all available in the files for review.
 - b. The site inspection and sampling review forms being used to determine compliance were not complete.
 - c. There are no records of self-monitoring and reporting from September 2025 to June 2026, with the exception of March 2026 for Herr's Foods. The CA failed to investigate and conduct enforcement action on this matter. A Notice of Violation was not sent to the SIU. On September 14, 2026, Ohio EPA received an email that a notice of violation letter was sent to Herr's Foods.
 - d. The SIU also failed to provide the required monitoring reports to the CA within 45 days.
 - e. The CA has not published this SIU in SNC during this period.
 - f. The CA failed to follow the ERP procedure for non-compliance.
7. The following observations were made by Ohio EPA during the Kenworth file review:
 - a. Previous permit cycle had an expiration date of October 15, 2025. The current permit cycle has an effective date of December 1, 2025.
 - b. Two different sampling locations are specified in the permit, a sample box and a manhole. Not all the parameters listed in the sampling table are being sampled at both sampling locations. Sampling obtained at the sample box is missing analysis for temperature, total arsenic, hexavalent chromium, total mercury, total selenium, and oil & grease.
 - c. The sampling table in the permit lists Hexavalent Chromium to be sampled using a composite method instead of the grab method.
 - d. The inspection checklist from October 8, 2024, facility inspection identifies the facility as being subject to categorical standards. Kenworth Truck Co. is a noncategorical user.
 - e. The industrial waste survey questionnaire signed by the industry official on March 19, 2024, details an expansion will occur in the next three years for a new Chassis Paint Project. The questionnaire was also incomplete due to questions not being

answered and supporting documentation being provided in addition to the submitted application was not signed or initialed by the reviewer for completeness.

8. The CA has had recent employee turnover. As a result of this, the pretreatment coordinator employed during the inspection was undertrained in the significant components of the pretreatment program.

Recommendations:

The recommendations set out below are not Orders. The recommendations are offered by Ohio EPA in an effort to provide compliance assistance to your facility.

1. It is recommended that the CA ensure the SIU's are following the sampling frequencies and the results and documentation is being provided.
2. It is recommended that the permittee require, receive, and reviews self-monitoring and other industrial user reports when necessary to determine compliance with pretreatment standards and requirements.
3. It is recommended that the CA follow the ERP for industrial user noncompliance.
4. It is recommended that the permittee have sufficient resources and qualified personnel to fully implement all aspects of the approved pretreatment program.
5. It is recommended that completed applications (Industrial Waste Surveys) be submitted by the IU's prior to permit renewals.
6. It is recommended that the Quarterly Industrial User Violation Reports be submitted on or prior to the 15th day of January, April, July, and October.
7. Ohio EPA recommends 40 CFR Part 3, Cross - Media Electronic Reporting be consulted by the Control Authority (CA) for further information on requirements, if electronic records are to be maintained without paper copies.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 740.384.5425 or e-mail at Emily.Poling@epa.ohio.gov.

Sincerely,

Emily Poling

Emily Poling

Environmental Specialist II

Division of Surface Water

EP/aa

CONTROL AUTHORITY PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

INDUSTRIAL PRETREATMENT PROGRAM PCI CHECKLIST CONTENTS

Facility: City of Chillicothe WWTP

NPDES Permit: 0PD00003

Cover Page and Acronym List

- ☒ Section I IU File Evaluation
 - ☒ Section II Supplemental Data Review/Interview
 - ☒ Section III Evaluation and Summary **(Optional)**
 - ☒ Attachment A - PCI Pre-Inspection Checklist
 - ☒ Attachment B - PCI Pretreatment Program Profile
 - ☒ Attachment C Worksheets
 - ☒ WENDB/ RNC Worksheet
 - ☐ IU Site Visit Report Form **(Optional) – Not Completed**
 - ☐ File Review Worksheets **(Optional)**
 - ☐ Attachment D Supporting Documentation
- Last audit and Inspection: PAI: 1/21/2025; PCI: 4/03/2024**

Control Authority (CA) name and address

Date(s) of PCI

City of Chillicothe
Mayor and Council
35 South Paint Street
Chillicothe, Ohio 45601

Onsite: 08/10-
11/2026

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Emily Poling	District Representative/ Ohio EPA Division of Surface Water	740.380.5425

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
Eric Vannatter	Pretreatment Coordinator Email: eric.vannatter@chillicotheoh.gov	740.774.1223

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

SECTION I: IU FILE EVALUATION

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.

Industry Information tables are included below. If you are reviewing less than five files, delete the excess tables.

#1 Herrs Food		
Address: 476 East 7th Street Chillicothe, Ohio 45601	Was this industry visited during the inspection?	No
	If the facility was visited, was an IU Visit Sheet Completed?	No
OPERATIONS & STANDARDS		
The POTW classified this industrial user as a ...	Non-Categorical Significant Industrial User	
Type of industry, products made, services offered:	Food Manufacturing – SIC code 2096 – Potato chips, corn chips, similar snacks	
Applicable categorical pretreatment standards:	None	
FILE REVIEW PERIOD	FLOW RATES (gallons per day)	
4/1/2024 to 7/1/ 2026	Process: 29,000	TOTAL: 31,600
COMPLIANCE STATUS		
During the file review period, did the POTW find the industry in non-compliance of the following?	Current Status	
Violation of pretreatment standards	No	Non-Compliance
Significant Non-Compliance (SNC)	No	Non-Compliance

Control Mechanism: Industrial Discharge Orders

1. Does the approved control mechanism include the following?

Components	Yes / No	Comments
a. Statement of duration	Yes	
b. Statement of non-transferability	Yes	
c. Effluent limits	Yes	
d. Self-monitoring requirements	Yes	
• Identification of pollutants to be monitored	Yes	
• Sampling location	Yes	
• Sample type	Yes	
e. Statement of applicable civil and criminal penalties	Yes	
f. Applicable compliance schedule	N/A	If needed.

- Does the sampling location contain nonregulated or dilution waste streams for:

CA: ☐ Yes ☒ No

IU: ☐ Yes ☒ No

If yes, is the CWF applied? ☐ Yes ☐ No ☒ N/A

If yes, is the FWA applied? ☐ Yes ☐ No ☒ N/A

- Sampling review completed for IU. ☐ Yes ☒ No

Comments:

- Completed chain of custody forms were not all available in the files for review.
- The site inspection and sampling review forms being used to determine compliance were not complete.
- There are no records of self-monitoring and reporting from September 2025 to June 2026, with the exception of March 2026, for Herr's Foods. The CA failed to investigate and conduct enforcement action on this matter. A Notice of Violation was not sent to the SIU.
- The SIU also failed to provide the required monitoring reports to the CA within 45 days.
- The CA has not published this SIU in SNC during this period.
- The CA failed to follow the ERP procedure for non-compliance.

#2 Kenworth Truck Company		
Address: 476 East 7th Street Chillicothe, Ohio 45601	Was this industry visited during the inspection?	No
	If the facility was visited, was an IU Visit Sheet Completed?	No
OPERATIONS & STANDARDS		
The POTW classified this industrial user as a ...	Non-Categorical Significant Industrial User	
Type of industry, products made, services offered:	Manufacturing and Assembling Medium and Heavy-Duty Trucks: SIC code 3711	
Applicable categorical pretreatment standards:	None	
FILE REVIEW PERIOD	FLOW RATES (gallons per day)	
4/1/2024 to 7/1/ 2026	Process: 70,000	TOTAL: 120,000
COMPLIANCE STATUS		
During the file review period, did the POTW find the industry in non-compliance of the following?		Current Status
Violation of pretreatment standards	No	Non-Compliance
Significant Non-Compliance (SNC)	No	Non-Compliance

Control Mechanism: Industrial Discharge Orders

1. Does the approved control mechanism include the following?

Components	Yes / No	Comments
g. Statement of duration	Yes	
h. Statement of non-transferability	Yes	
i. Effluent limits	Yes	
j. Self-monitoring requirements	Yes	
• Identification of pollutants to be monitored	Yes	
• Sampling location	Yes	
• Sample type	Yes	
k. Statement of applicable civil and criminal penalties	Yes	
l. Applicable compliance schedule	N/A	If needed.

- Does the sampling location contain nonregulated or dilution waste streams for:

CA: ☐ Yes ☒ No

IU: ☐ Yes ☒ No

If yes, is the CWF applied? ☐ Yes ☐ No ☒ N/A

If yes, is the FWA applied? ☐ Yes ☐ No ☒ N/A

- Sampling review completed for IU. ☐ Yes ☒ No

Comments:

- Previous permit cycle had an expiration date of 10/15/25. The current permit cycle has an effective date of 12/01/25.
- Two different sampling locations are specified in the permit, a sample box and a manhole. Not all the parameters listed in the sampling table are being sampled for at both sampling locations. Sampling obtained at the sample box is missing analysis for temperature, total arsenic, hexavalent chromium, total mercury, total selenium, and oil & grease.
- The sampling table in the permit lists Hexavalent Chromium to be sampled using a composite method. 40 CFR 136 requires sample be taken using the grab method.
- The inspection checklist from the October 8, 2024, facility inspection identifies the facility as being subject to categorical standards. Kenworth Truck Co. is a non-categorical user.
- The industrial waste survey questionnaire signed by the industry official on 3/19/24 details an expansion will occur in the next three years for a new Chassis Paint Project. The questionnaire was also incomplete due to questions not being answered and supporting documentation being provided in addition to the submitted application was not signed or initialed by the reviewer for completeness.

SECTION I: IU FILE EVALUATION

Herr's Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
<u>File</u> 001		<u>File</u> 002	<u>IU FILE REVIEW</u>	<u>Reg. Cite</u>
-		-	A. CA NOTIFICATION OF IU	
x		x	1. Notified of classification (new IU) or change in classification (existing IU)	403.8(f)(2)(iii)
NA		NA	* BMR/90-day report submitted (for new IU)	403.12(b)&(d)
NA		NA	2. Notified of applicable RCRA standards	403.8(f)(2)(iii)

Herrs Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
	File 001		File 002	Reg. Cite
			<u>IU FILE REVIEW</u>	
-	-		B. ISSUANCE OF IU CONTROL MECHANISM	
X	X		1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
-	-		2. Control mechanism contents	403.8(f)(1)(iii)
X	X		a. Statement of duration (<5 years)	
X	X		b. Statement of non-transferability w/o prior notification	
X	X		c. Listing of applicable effluent limits (local, categorical standards)	
-	-		d. Self-monitoring requirements	
X	X		i. Identification of pollutants to be monitored	
X	X		ii. Sampling frequency	
X	X		iii. Sampling at locations/discharge points adequately defined	
X	X		iv. Appropriate sample types (grab or composite)	
X	X		v. Reporting requirements	
X	X		vi. Record-keeping requirements (3 years minimum)	
X	X		e. Statement of applicable civil and criminal penalties	
NA	NA		f. Compliance schedules	
X	X		g. Requirement to notify CA of slug loadings	
X	X		h. Requirement to notify CA of spills, bypasses, upsets, etc.	
X	X		i. Requirement to notify CA of significant change in discharge	
X	X		j. 24-hour notification of violation/resample requirement	
Comments for Section B. Issuance of IU Control Mechanism: None				

Herrs Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
<u>File</u> 001		<u>File</u> 002	<u>IU FILE REVIEW</u>	<u>Reg. Cite</u>
-		-	C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
X		X	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)
X		X	a. Proper classification by category/subcategory	
X		X	b. Proper classification as new/existing source	
X		X	c. Proper application of limits for all regulated pollutants	
NA		NA	d. Proper calculation and application of production-based standards	403.6(c)
NA		NA	e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
X		X	2. Application of local limits	
X		X	3. Application of most stringent limits	403.8(f)(1)(ii)
Comments for Section C. CA Application of IU Pretreatment Standards: None				

Herr's Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
<u>File</u> 001		<u>File</u> 002	<u>IU FILE REVIEW</u>	<u>Reg. Cite</u>
-		-	D. CA COMPLIANCE MONITORING	
-		-	Sampling	
O		O	1. Sampled at frequency specified in approved pretreatment program	
O		O	2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
O		O	3. Sampled all parameters for which local or categorical limits applied	
O		O	4. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
-		-	Inspection	
X		X	1. Inspected at frequency specified in approved program	
O		O	2. Documentation of inspection activities	403.8(f)(2)(vi)
X		X	3. Evaluated need for slug discharge control plan at least once after 2007 (or after 1 year of determination as an SIU, for new dischargers)	403.8(f)(2)(v)
Comments for Section D. CA Compliance Monitoring: • Chain of Custody forms were not available in the files for review. • Sampling results were reviewed and from September 2025 to July 2026 for Herr's Foods and only sampling data from March 2026 was submitted to the control authority for review.				

Herr's Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
File 001		File 002	IU FILE REVIEW	Reg. Cite
-		-	E. CA ENFORCEMENT ACTIVITIES	
-		-	1. Response to violations	403.8(f)(2)(vi)
O		X	a. Discharge violations	
O		X	b. Monitoring/reporting violations	
NA		NA	c. Compliance schedule violations	
-		-	2. Proper calculation of SNC	403.8(f)(2)(vii)
O		X	a. Chronic	
X		X	b. TRC	
X		X	c. Pass-through/interference caused by spill or slug discharge	
O		O	d. Reporting requirements	
O		O	3. Publication for SNC	403.8(f)(2)(vii)
-		-	4. Adherence to approved ERP	403.8(f)(5)
O		O	a. Proper response to violations	
O		O	b. Escalation of enforcement	
Comments for Section E. CA Enforcement Activities: - From September 2025 to July 2026 for Herr's Foods only sampling data from March 2026 was submitted. CA failed to investigate and conduct enforcement action on this matter. A Notice of Violation was not sent to the SIU by the CA. - The SIU also failed to provide the required monitoring reports to the CA within 45 days. - The CA has not published this SIU in SNC during this period.				

Herrs Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
	File 001		File 002	Reg. Cite
			<u>IU FILE REVIEW</u>	
-		-	F. SELF-MONITORING AND REPORTING	
O		O	1. Sampled at frequency specified in control mechanism/regulation	403.12(e)&(h)
-		-	2. TTO Requirements met	
NA		NA	a. TOMP submitted and updated (if applicable)	
NA		NA	b. TTO sample results or certification statement submitted as required	
O		O	3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
O		O	4. Reported for all required pollutants	403.12(g)(1)&(h)
X		X	5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
X		X	6. Met compliance schedule milestones by required dates	403.12(c)
X		X	7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
X		X	8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
X		X	9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
X		X	10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
X		X	11. Notified CA of significant changes in operation or discharge	403.12(j)

Herrs Foods		Kenworth Trucking	INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
<u>File</u> <u>001</u>		<u>File</u> <u>002</u>	<u>IU FILE REVIEW</u>	
			G. OTHER (None)	
Comments for Section G. Other: No comments.				
SECTION I COMPLETED BY:		Emily Poling		DATE: 8/31/26
TITLE:		Environmental Specialist II		TELEPHONE: 740.380.5425

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? ☒ **Yes** ☐ **No**
(Local limits, ERP, SUO, control mechanisms, SIU list, etc.)

Comments: **SUO was updated to include what is required to be included on permit applications.**

2. Have you identified any needed changes? ☐ **Yes** ☒ **No**

Comments: **N/A**

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

1. How do you identify and characterize new IUs? Is an Industrial Waste Survey (IWS) used?
The IU is identified by Company name and categorized as Major Significant, Minor Significant, Nonsignificant, and Dry industrial users. The City Engineer or Planning Commission notifies the Wastewater Treatment Plant of possible new industries. The potential new industry must complete the IWS before becoming operational. Industries are encouraged to supply the required information as early as possible to avoid potential delays in permitting by the CA.

2. How and when do you identify changes in wastewater discharges at existing IUs?
How do you determine if they need to be classified as a SIUs?
Changes are identified during annual inspections or any sampling event. There are no contributing jurisdictions. The permits issued by the CA also require the industry to notify the CA of any changes. It is a permit condition that the CA be notified if there are changes in wastewater discharges at existing IUs. The SIU classification is also checked during inspections, monitoring events and permit renewals.

3. How many IUs are currently identified by the CA in each of the following groups?

	Number	Number
a. SIUs (as defined by the CA) [WENDB-SIUS]	3	-
- CIUs [WENDB-CIUS]	---	0
- Noncategorical SIUs		3
b. Non-Significant Industrial Users	3	-
- Non-Significant CIUs	0	
- Other regulated noncategorical IUs (specify)	1	
c. TOTAL IUs	7	-

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENDB~NOCM] [RNC~1]	#	Total SIUs
	0	0
	0	%

Comments: **N/A**

2. How many control mechanisms were... a. Allowed to expire prior to reissuance? b. Not issued within 180 days of the expiration date of the previous control mechanisms?	# Control Mechanisms
	2
	2

Comments: **N/A**

- c. Do you use an up to date IWS or recent discharge application forms prior to permit reissuance?

☒ Yes ☐ No

Comments: **Updates to IWS are required for permit renewal.**

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

1. Evaluating SIUs for the need to develop slug control discharge plans

a. Is the CA's definition of slug discharge different from the federal or state definitions [40 CFR 403.8(f)(2)(vi) and OAC 3745-3-01]? ☐ Yes ☒ No
Comments: **N/A**

b. How and when do these evaluations occur? (check on CA's definition of slug discharge)
Comments: **The need is evaluated during the permit process. Each permit defines and discusses slug loading. The need for a slug load plan is also discussed during the annual inspection.**

c. How many SIUs were evaluated in the past two years? SIUs: **3**
Comments **N/A**

2. Do any IUs haul their wastewater to the POTW?
If "Yes, complete Questions 2.a – c below. ☐ Yes ☒ No

a. Describe these hauled wastes:
The POTW accepts septage from local haulers only.

b. How do you ensure all applicable standards (local and categorical) are met?
Hauled septic waste is only accepted during specific hours and at designated points at the POTW. All hauled wastes are subject to sampling. No hauled industrial waste is accepted by the POTW.

c. List all IUs that haul their wastewater to the POTW:
None

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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: 4/1/2024 – 7/31/2026		
a. Not sampled or inspected at least once [WENDB-NOIN]	#	Total SIUs
	0	0%
b. Not sampled at least once	#	Total SIUs
	0	0%
c. Not inspected at least once	#	Total SIUs
	0	0%
	0	0%
Comments: None		
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
Comments: Herr's is in SNC for not submitting periodic self-monitoring reports within 45 days between the months of September 2025 to July 2026.		

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. Enforcement			
Which of the following enforcement actions did you use during the past year?			
	Yes	No	Comments (if any)
a. Notice or letter of violation		X	
b. Administrative Order		X	
c. Administrative Fine		X	
d. Show cause hearing		X	
e. Compliance schedule		X	
f. Permit revocation		X	
g. Civil suits		X	
h. Criminal suits		X	
i. Termination of service		X	
j. Other (Specify)		X	
Other Comments: The CA failed to send a letter of violation to Herr's for the failure to self-report and for not providing sampling reports within 45 days.			
Did the treatment plant experience any of the following during the past year?			
	Yes	No	Comments (if any)
a. Interference		X	
b. Pass Through		X	
c. Fire or explosions (flashpoint, etc.)		X	
d. Corrosive structural damage		X	
e. Flow obstructions		X	
f. Excessive flow rates		X	
g. Excessive pollutant concentrations		X	
h. Heat problems		X	
i. Interference due to Oil & Grease		X	
j. Toxic fumes		X	
k. Illicit dumping of hauled wastes		X	
l. Worker health and safety concerns		X	
m. Other (Specify)			
Other Comments: N/A			
Were you made aware of any hazardous waste discharges to the POTW? [403.12(j) and (p)]			☐ Yes ☒ No
Comments: N/A			

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

G. GENERAL OBSERVATIONS / INFORMATION ENFORCEMENT

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

☒ Yes ☐ No

Comments: **The CA has had employee turnover. As a result of this, the pretreatment coordinator was undertrained in the significant components of the pretreatment program.**

SECTION II COMPLETED BY:	Emily Poling	DATE:	8/31/2026
TITLE:	Environmental Specialist II	TELEPHONE:	740.380.5425

SECTION III: EVALUATION AND SUMMARY

A. CA PRETREATMENT PROGRAM MODIFICATION	
1. Status of program modifications [40 CFR 403.18 / Checklist II.A.1]	☐ Action Recommended ☐ Action Required ☒ No Action needed

B. IU CHARACTERIZATION	
1. Identify and locate all SIUs [40 CFR 403.8(f)(2) / Checklist II.B]	☐ Action Recommended ☐ Action Required ☒ No Action needed
2. Identify the character and volume of pollutants contributed to the POTW by IUs [40 CFR 403.8(f)(2)(ii) / Checklist II.B.1, II.E.1]	☐ Action Recommended ☐ Action Required ☒ No Action needed

C. CONTROL MECHANISM EVALUATION	
1. Issue individual control mechanisms to all SIUs [40 CFR 403.8(f)(2) / Checklist I.B.1, II.C]	☐ Action Recommended ☐ Action Required ☒ No Action needed
2. Ensure control mechanisms contain all required components [40 CFR 403.8(f)(1)(iii) / Checklist I.B.2]	☐ Action Recommended ☐ Action Required ☒ No Action needed

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS	
1. Apply all applicable pretreatment standards [40 CFR 403.8(f)(1)(iii), 403.5 / Checklist I.C.1-4]	☐ Action Recommended ☐ Action Required ☒ No Action needed

SECTION III: EVALUATION AND SUMMARY

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS	
2. Evaluate the need for SIUs to develop slug discharge control plans [40 CFR 403.8(f)(2)(vi) / Checklist I.D.7, II.D.1]	☐ Action Recommended ☐ Action Required ☒ No Action needed
E. COMPLIANCE MONITORING	
1. Inspect and sample each SIU in accordance with the approved program [Checklist I.D.1 & 5, II.E.1]	☒ Action Recommended ☐ Action Required ☐ No Action needed
Kenworth Trucking sampling was conducted but not all the parameters were sampled for.	
2. Use proper sampling analysis (40 CFR Part 136) and inspection procedures [40 CFR 403.8(f)(2)(v) / Checklist I.D.2-3,4,6, & 7]	☐ Action Recommended ☒ Action Required ☐ No Action needed
The pH was not being analyzed within 15 minutes of sample collection.	
3. Require, receive, and analyze reports from SIUs at least once every 6 months [40 CFR 403.12(e)&(h) / Checklist I.F]	☐ Action Recommended ☒ Action Required ☐ No Action needed
Herr's Food's did not submit reports between September 2025 and July 2026.	
4. IU submitting resampling results 30 days after being aware of a violation [40 CFR 403.12(g)(1)&(2) / Checklist I.F.9]	☐ Action Recommended ☐ Action Required ☒ No Action needed
5. Require self-monitoring reports from IUs to be signed and certified [40 CFR 403.12(l) / Checklist I.F.5]	☐ Action Recommended ☐ Action Required ☒ No Action needed
6. Receive notification of significant changes in operation or discharge, including hazardous waste discharges [40 CFR 403.12(p) / Checklist I.F.11]	☒ Action Recommended ☐ Action Required ☐ No Action needed
Ohio EPA recommends the CA requires SIU production changes in writing for record keeping purposes.	

SECTION III: EVALUATION AND SUMMARY

F. ENFORCEMENT	
1. Implement the approved ERP [40 CFR 403.8(f)(5) / Checklist I.E.4] CA should review ERP and compare it to the SUO to ensure the ERP is consistent with the latest version of the SUO and being implemented as required in the SUO.	☒ Action Recommended ☐ Action Required ☐ No Action needed
2. Annually publish a list of IUs in SNC [40 CFR 403.8(f)(2)(vii) / Checklist I.E.3] CA has not published Herr's Foods for being in SNC.	☐ Action Recommended ☒ Action Required ☐ No Action needed
3. Develop IU compliance schedules [40 CFR 403.8(f)(1)(iv) / Checklist I.B.2.f, II.F.1.e]	☐ Action Recommended ☐ Action Required ☒ No Action needed
4. Ensure IU compliance within 3 years of standards' effective date (or less than 3 years where required by standard) [40 CFR 403.6(b)]	☐ Action Recommended ☐ Action Required ☒ No Action needed
5. Ensure new sources report on compliance with appropriate standards within the first 90 days of discharge [40 CFR 403.12(d) / Checklist I.A]	☐ Action Recommended ☐ Action Required ☒ No Action needed
G. ADDITIONAL EVALUATIONS	
1. Electronic Reporting [40 CFR 403.12(i)] All electronic reports received are copied and maintained in paper files. Reporting to the Ohio EPA is utilizing electronic reporting.	☐ Action Recommended ☐ Action Required ☒ No Action needed
2. N/A	☐ Action Recommended ☐ Action Required ☐ No Action needed

SECTION III: EVALUATION AND SUMMARY

F. ENFORCEMENT	
3. N/A	☐ Action Recommended ☐ Action Required ☐ No Action needed

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE (cont.)

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE

Pretreatment Pre-Inspection Checklist

PCI/Audit/RI

Instructions

This checklist must be completed prior to conducting a PCI, audit, or RI. This checklist is designed to coordinate information from several sources to provide background information and to help develop an overview of the pretreatment program. Summarize items that should be verified during inspection. If items are too numerous or get too lengthy to summarize, copy appropriate pages and attach.

<u>Today's</u> Inspection Information			
POTW Name:	Chillicothe WWTP	NPDES #:	0PD00003
Inspection Date:	August 10, 2026	Inspector:	Emily Poling
Type of Inspection:	☒ Pretreatment Compliance Inspection (PCI) ☐ Pretreatment Audit Inspection (PAI) ☐ Reconnaissance Inspection (RI)		

<u>Last</u> Inspection Information			
<u>Last</u> Inspection Date:	January 21, 2025	Inspector:	Chris Walton
Type of Inspection:	☐ PCI ☒ PAI ☐ RI		

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE (cont.)

I. Program Deficiencies
Are there any pretreatment-related Consent Decrees and/or Administrative Orders that were completed or are pending since the last inspection? ☐ Yes ☒ No Comments: N/A
Does the permittee have any pretreatment requirements in the NPDES Permit's compliance schedule? ☒ Yes ☐ No If "Yes", describe the items completed, overdue, and/or pending: Completed: - Adequacy of local limits within 6 months of effective date. - Technical justification with report. - Local limits final approval. Overdue: N/A Pending: N/A
Since the last Pretreatment Inspection, has the POTW been in Significant Non-Compliance (SNC)? ☒ Yes ☐ No If "Yes", explain why. Description: The POTW was in SNC for E.coli, pH, and ammonia violations. The POTW is undergoing a complete upgrade of the POTW treatment systems.
In the last PCI, Audit, or RI were there any unresolved issues or corrective actions that the POTW needed to do? ☐ Yes ☒ No If "Yes", explain describe. Description: N/A

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE (cont.)

II. Control Authority Submittals and Reports

Has the POTW submitted any program modifications since the last inspection?

☐ Yes ☒ **No**

If “Yes”, describe the submittals and their status.

Click or tap here to enter text.

For the most recently submitted Annual Pretreatment Report...

Was the report late? ☒ **Yes** ☐ No

Is the report incomplete? ☐ Yes ☒ **No, but it is incorrect.**

Do you have any comments or follow-up questions about this report? ☒ **Yes** ☐ No

If “Yes” for any of the above, describe.

Comments:

- **The 2025 annual report submitted 6/24/2025 was due on 6/15/25. The 2026 annual report submitted on 6/29/26 was due on 6/15/26.**
- **Reports show three significant CIUs in the IPP. These should be shown as significant non-categorical.**

For the most recent 12 months of submitted Quarterly Pretreatment Reports...

Were any of the reports late? ☒ **Yes** ☐ No

Are any of the reports incomplete? ☒ **Yes** ☐ No

Do you have any comments or follow-up questions about these reports? ☒ **Yes** ☐ No

If “Yes” for any of the above, describe.

Comments: **No Quarterly reports have been submitted since October 2025.**

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE (cont.)

II. Control Authority Submittals and Reports

Has the POTW been submitting any of the following reports through Ohio EPA's eBusiness Center?

- ☒ **Annual Pretreatment Report**
☒ **Quarterly Pretreatment Report**
☒ **Priority Pollutant Scans (annual)**

If any of the above are not being submitted electronically, consider bringing pamphlets or other material to encourage electronic submittals prior to the deadline, December 21, 2020.

Comments: **N/A**

What number of SIUs were identified as being in SNC with the following?

Applicable pretreatment standards and reporting requirements	0	0%
Self-monitoring requirements	0	0 %
Pretreatment compliance schedules	0	0 %

SNC Evaluation Period: 1/1/2025 to 7/31/2026

SNC information based on:

☒ **Most recent Quarterly Pretreatment Report**

☒ **Most recent Annual Pretreatment Report**

☒ **Other:**

☒ **Yes** ☐ No

If "Yes", describe the submittals and their status.

Click or tap here to enter text. **The CA did not identify Herr's Food as being in SNC for nonsubmittal of self-monitoring reports.**

Based on the Annual and Quarterly Pretreatment Reports, which industrial users will be reviewed and/or inspected? **There are 3 SIUs in the program. Herrs Food and Kenworth will be reviewed. No optional inspections will be conducted during this PCI.**

List industrial users here:

NCSIU: **(3) Herrs Foods, Adena Medical Center, & Kenworth**

Other IUs: **Howmet (f.k.a Arconic), Rumpke, YSK, & Vitatoe.**

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE (cont.)

II. Control Authority Submittals and Reports
III. NPDES Permit Violations (since 1/1/25)
Have there been any effluent violations of the NPDES permit's limits? ☒ Yes ☐ No If "Yes" to the above, are there any pollutant violations which are possibly impacted by the industrial users? ☐ Yes ☒ No ☐ N/A If "Yes" to the above, describe: The POTW has experienced ammonia, E.coli and pH violations.
Do any pollutants on eDMR appear to exceed the levels described in the current NPDES Fact Sheet's "Summary of Effluent Limits to Maintain Applicable Water Quality Criteria" Table? ☐ Yes ☒ No Do any of the pollutants show a significant upward trend at the POTW's influent or effluent? ☐ Yes ☒ No If "Yes" to any of the above, describe: N/A
Are there any sludge issues to discuss? (sludge limit violations, inability to discharge sludge due to high metals, etc.) ☐ Yes ☒ No If "Yes", explain. Description: N/A

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CONTROL AUTHORITY INFORMATION

- | | |
|---|---|
| 1. Control Authority Name | City of Chillicothe WWTP Easterly |
| 2. Original pretreatment program submission approval date | Program was approved on March 29, 1985. |
| 3. Required frequency of reporting to Ohio EPA | Annual and Quarterly Reports |

4. POTW Information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
Chillicothe Easterly WWTP	OPD00003	December 1, 2025	November 30, 2030

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM] – **Program was approved on March 29, 1985.**

2. Identify any substantial modifications the CA made in its pretreatment program in the last five years. [403.18] None

Date Approved	Name of Modification	Description (if available)
N/A		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

C. TREATMENT PLANT INFORMATION

INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.

1. Treatment Plant Name **Chillicothe Easterly - WWTP is currently undergoing major construction.**

2. Location Address **405 Environmental Way, Chillicothe, OH 45601**

3. NPDES Permit Info

a. NPDES Permit #: **0PD00003**

b. Expiration Date: **11/30/2030**

4. Treatment Plant Wastewater Flows

Design Flow (MGD)	Actual Flow (MGD)
3.8	2.50

5. Sewer System

100%

a. Separate (%)	100%
b. Combined (%)	0%
c. Number of CSOs	0

6. Industrial Flow Information

a. Industrial Contribution (MGD)	0.216 MGD
b. Number of SIUs discharging to plant	3
c. Percent Industrial Flow to Plant	8.6 %

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

C. TREATMENT PLANT INFORMATION

7. Level of Treatment

Treatment Level	Type of Process(es)
a. Primary	Influent Pumping, Bar Screen, grit & Scum Removal, Flow Equalization.
b. Secondary	Primary Clarifiers, Secondary Clarifiers, Activated Sludge
c. Tertiary	UV disinfection. Sludge is processed by gravity thickening and anaerobic digestion, then dewatered with a centrifuge. Dewatered sludge is land applied at agronomic rates.

8. Indicate the required monitoring frequencies for pollutants identified in the NPDES Permit.

Pollutant Type	Influent (times/year)	Effluent (times/year)	Sludge (times/year)	Receiving Stream (times/year)
a. Metals	4	4	4	0
b. Organics	1	1	1	0
c. Toxicity Testing	0	1	0	1
d. EP Toxicity	0	0	0	0
e. TCLP	0	0	0	0

9. Effluent Discharge

a. Receiving Water Name	Lick Run- Scioto River
b. Receiving Water Classification	Full Attainment - WWH
c. Receiving Water Use	Agricultural Water Supply, Industrial Water Supply, and Primary Contact Recreation.
d. Is effluent discharged to any location other than receiving water?	☐ Yes ☒ No

If "Yes" to Question C.9.d (above), provide a description.

N/A

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

C. TREATMENT PLANT INFORMATION

10. Did the CA submit results of whole effluent biological toxicity testing as part of its NPDES permit application(s)?
[122.21(j)(1) and (2)]

☒ **Yes** ☐ No

a. If "Yes" to the above, did the CA use EPA-approved methods? [122.21(j)(3)]

☐ Not Applicable ☒ **Yes** ☐ No

b. Has there been a pattern of toxicity demonstrated?

☐ Not Applicable ☐ Yes ☒ **No**

11. Indicate methods of sludge disposal.
Transferred to Quasar for land application.

Disposal Method	Quantity of Sludge (dry tons/year)	Comments
a. Land Application	299.96 (2025)	
b. Incineration	0.0	
c. Monofill	0.0	
d. MSW Landfill	5.75 (2025)	
e. Public Distribution	0.0	
f. Lagoon Storage	0.0	
g. Other (specify)		

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

D. LEGAL AUTHORITY

1. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained.

a. Ordinance or Other Document	Chillicothe Sewer Use Ordinance
b. Date Enacted / Adopted	3/29/1985
c. Date of most recent revisions	6/9/25

2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(I-vii)]

	Yes	No
a. Deny or condition pollutant dischargers [403.8(f)(1)(I)]	x	
b. Require compliance with standards [403.8(f)(1)(ii)]	x	
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]	x	
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]	x	
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]	x	
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]	x	
g. Comply with confidentiality requirements [403.8(f)(1)(vii)]	x	

3. Contributing Jurisdictions

- a. How many contributing jurisdictions are there?

Jurisdiction Name	Number of CIUs	Number of Other SIUs
N/A	0	0

- b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

☒ **Not Applicable** ☐ Yes ☐ No

If "Yes" to Question D.3.b (above), describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.)

N/A

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform. **N/A**

- | | | |
|---|---|--|
| ☐ a. IWS update | ☐ b. Permit issuance | ☐ c. Inspection and sampling |
| ☐ d. Enforcement | ☐ e. Notification of IUs | ☐ f. Receipt and review of IU reports |
| ☐ g. Analysis of samples | ☐ h. Analysis of samples | |
| ☐ Other (specify) | | |

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

E. IU CHARACTERIZATION

1. Identification of Industrial Users

a. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(I)]

☒ **Yes** ☐ **No**

b. Indicate which methods are to be used to update the IWS.

- ☒ **Review of newspaper / phone book** ☒ **Onsite inspections**
☒ **Review of water billing records** ☒ **Permit application requirements**
☒ **Review of plumbing / building permits** ☒ **Citizen's involvement**
☐ Other (specify)

c. How often is the IWS Updated? **At a minimum the IWS is updated during the permit renewal application process.**

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(t)(1)]

☒ **Yes** ☐ **No**

If "No", provide the CA's definition of "Significant Industrial User."

F. CONTROL MECHANISM

1. Control Mechanism

- a. Identify the CA's approved control mechanism (e.g., permit, etc.).
b. What is the maximum term of the control mechanism?

Wastewater Discharge Permit
5 years

2. Does the approved control mechanism include the following?

Components	Yes / No	Comments
a. Statement of duration	Yes	
b. Statement of non-transferability	Yes	
c. Effluent limits	Yes	
d. Self-monitoring requirements	Yes	
• Identification of pollutants to be monitored	Yes	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

F. CONTROL MECHANISM

• Sampling location	Yes	
• Sample type	Yes	
e. Statement of applicable civil and criminal penalties	Yes	
f. Applicable compliance schedule		Only if needed.

3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?
☒ **Not Applicable** ☐ Yes ☐ No

Comments: **The CA only accepts hauled residential waste.**

4. Does the program identify designated discharge point(s) for trucked or hauled wastes? [403.5(b)(8)]
☐ Not Applicable ☒ **Yes** ☐ No

If "Yes," describe the discharge point(s) (including security procedures).
Must be hauled to POTW and approved prior to dumping at POTW.

G. APPLICATION OF STANDARDS

1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]

Yes

No

X

Comments: **N/A**

2. If there is more than one treatment plant, were local limits established specifically for each plant?

☒ **Not Applicable**

☐ Yes

☐ No

3. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

☒ **Yes**

☐ No

If "No" to Question #G.3, was there a Partial Technical Evaluation for the pollutants?

☒ **Not Applicable**

☐ Yes

☐ No

Pollutant	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (numeric, mg/L)
	Yes	No	Yes	No	Yes	No	Existing
a. Arsenic (As)	X		X		X		0.165 mg/l
b. Cadmium (Cd)	X		X		X		0.150 mg/l
c. Chromium (Cr)	X		X		X		11.291 mg/l
d. Copper (Cu)	X		X		X		2.588 mg/l
e. Cyanide (CN)	X		X		X		0.025 mg/l
f. Lead (Pb)	X		X		X		0.789 mg/l
g. Mercury (Hg)	X		X		X		0.024 mg/l
h. Molybdenum (Mo)		X		X		X	
i. Nickel (Ni)	X		X		X		0.792 mg/l
j. Selenium (Se)							0.024 mg/l
k. Silver (Ag)	X		X		X		0.792 mg/l
l. Zinc (Zn)	X		X		X		0.993 mg/l
m. Other:							
Chromium Hex.	X		X		X		1.059 mg/l

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

H. COMPLIANCE MONITORING				
1. Indicate compliance monitoring and inspection frequency requirements.				
Program Aspect	Approved Program Requirement	NPDES Permit Requirement ^a	State Requirement ^{b, c}	Minimum Federal Requirement
a. Inspections				
• CIUs	N/A	1/year	1/year	1/year
• Other SIUs	1/year	1/year	1/year	1/year
b. Sampling by POTW				
• CIUs	N/A	1/year	1/year	1/year
• Other SIUs	1/ Year	1/year	1/year	1/year
c. Self-monitoring				
• CIUs	N/A	1/year	2/year	2/year
• Other SIUs	1/ Year	1/year	2/year	2/year
d. Reporting by IU				
• CIUs	N/A	As necessary for compliance	2/year	2/year
• Other SIUs	12/ Year	As necessary for compliance	2/year	2/year

I. ENFORCEMENT		
	Yes	No
1. Does the CA's program define "significant noncompliance"?	X	
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]	X	
If no, provide the CA's definition of "significant noncompliance." N/A		
2. Does the CA have an approved, written Enforcement Response Plan? [403.8(f)(5)]	X	
2. Indicate the compliance/enforcement options that are available to the POTW in the event of IU noncompliance. [403.8(f)(1)(vi)]		

^a By default, NPDES Permits are consistent with the State Regulations.

^b Inspections and sampling by POTW [OAC 3745-3-03(C)(2)(e), revised February 2019]

^c Self-monitoring and reporting by IU [OAC 3745-3-06(E)(1), revised February 2019]

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

I. ENFORCEMENT

Options		Type of Fine	Maximum Amount	
X	a. Notice or letter of violation	Civil	\$	\$1,000.00 / day / violation
X	b. Compliance schedule	Criminal	\$	\$1,000.00 / day / violation
X	c. Injunctive relief	Administrative	\$	\$1,000.00 / day / violation
X	d. Imprisonment			
X	e. Termination of service			
X	f. Administrative Order			
X	g. Revocation of permit			
X	h. Fines (complete table to right)			
X	i. Fines (complete table to the right)			

J. DATA MANAGEMENT / PUBLIC PARTICIPATION

1. Does the approved program describe how the POTW will manage its files and data?	Yes	No
File policies were discussed during the PCI. Confidential files are governed by the SUO.	X	
How does the approved program manage its files and data? (select all that apply)		
☒ Files/records ☒ Computerized ☒ Hard copy	Yes	No
Comments: Ohio EPA recommends 40 CFR Part 3, Cross - Media Electronic Reporting be consulted by the Control Authority (CA) for further information on requirements, if electronic records are to be maintained without paper copies		
2. Are program records available to the public?	X	
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]	X	

ATTACHMENT B: PRETREATMENT PROGRAM PROFILE (cont.)

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components:

Role	FTEs	Comments (if any)
a. Legal Assistance	N/A see comments below	
b. Permitting		
c. Inspections		
d. Sample collection		
e. Sample analysis		
f. Data analysis, review, and response		
g. Enforcement		
h. Administration		

Comments: The pretreatment coordinator is a full-time position, which administers and implements the IPP. The Wastewater Superintendent provides oversight and additional administration as needed. The solicitor is engaged whenever needed for legal matters. All sampling and analysis is conducted by contractors.

2. Identify the sources of funding for the pretreatment program and the amount collected in a 12-month period. [403.8(f)(3)]

12-Month Period:

Available	Source	Amount (\$)	Comments (if any)
☒	a. POTW general operating fund		
☐	b. IU permit fees		
☒	c. Industry surcharges		
☒	d. Monitoring charges		
☐	e. Other (specify)		
	TOTAL		Not available at audit.

ATTACHMENT B COMPLETED BY:	Emily Poling	DATE:	8/31/26
TITLE:	Environmental Specialist II	TELEPHONE:	740.380.5425

Attachment C – Worksheets

WENDB DATA ENTRY WORKSHEET

WENDB DATA ENTRY WORKSHEET																																			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.																																			
Control Authority Name	City of Chillicothe Easterly WWTP																																		
NPDES Number(s)	OPD00003																																		
Date of Inspection	4/03/2024																																		
Date entered into PCS	N/A																																		
<table border="1"> <thead> <tr> <th></th> <th>PCS Code</th> <th>Checklist Reference</th> <th>Data</th> </tr> </thead> <tbody> <tr> <td>Number of SIUs*</td> <td>SIUS</td> <td>II.B.2.a</td> <td>3</td> </tr> <tr> <td>Number of CIUs*</td> <td>CIUS</td> <td>II.B.2.a</td> <td>0</td> </tr> <tr> <td>- Number of SIUs without control mechanism</td> <td>NOCM</td> <td>II.C.1</td> <td>0</td> </tr> <tr> <td>- Number of SIUs not inspected or sampled</td> <td>NOIN</td> <td>II.E.1.a</td> <td>0</td> </tr> <tr> <td>- Number of SIUs in SNC** with standards or reporting</td> <td>PSNC</td> <td></td> <td>1</td> </tr> <tr> <td>- Number of SIUs in SNC with self-monitoring</td> <td>MSNC</td> <td></td> <td>1</td> </tr> <tr> <td>- Number of SIUs in SNC with self-monitoring and not inspected or sampled</td> <td>SNIN</td> <td></td> <td>0</td> </tr> </tbody> </table>					PCS Code	Checklist Reference	Data	Number of SIUs*	SIUS	II.B.2.a	3	Number of CIUs*	CIUS	II.B.2.a	0	- Number of SIUs without control mechanism	NOCM	II.C.1	0	- Number of SIUs not inspected or sampled	NOIN	II.E.1.a	0	- Number of SIUs in SNC** with standards or reporting	PSNC		1	- Number of SIUs in SNC with self-monitoring	MSNC		1	- Number of SIUs in SNC with self-monitoring and not inspected or sampled	SNIN		0
	PCS Code	Checklist Reference	Data																																
Number of SIUs*	SIUS	II.B.2.a	3																																
Number of CIUs*	CIUS	II.B.2.a	0																																
- Number of SIUs without control mechanism	NOCM	II.C.1	0																																
- Number of SIUs not inspected or sampled	NOIN	II.E.1.a	0																																
- Number of SIUs in SNC** with standards or reporting	PSNC		1																																
- Number of SIUs in SNC with self-monitoring	MSNC		1																																
- Number of SIUs in SNC with self-monitoring and not inspected or sampled	SNIN		0																																
WENDB DATA ENTRY WORKSHEET		DATE: 8/31/26																																	
COMPLETED BY: Emily Poling																																			
TITLE: Environmental Specialist II		TELEPHONE: 740-380-5425																																	

Attachment C – Worksheets

RNC WORKSHEET

RNC WORKSHEET		
INSTRUCTIONS: Place a check in the appropriate box to the left, if the CA is found to be in RNC or SNC.		
CA name City of Chillicothe, Easterly WWTP		
NPDES number 0PD00003		
Date of inspection: 8/10-11/2026		
	Level	Checklist Reference
☐ No Failure to enforce against pass through and/or interference	I	
☐ Yes Failure to submit required reports within 30 days	I	
☐ No Failure to meet compliance schedule milestone date within 90 days	I	
☐ No Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	
☐ No Failure to inspect or sample 80% of SIUs within the past 12 months	II	
☐ Yes Failure to enforce Pretreatment Standards and reporting requirements (more than 15% of SIUs in SNC)	II	
☐ N/A Other (specify)	II	
SNC		
☐ Yes CA in SNC for violation of any Level I criterion		
☐ Yes CA in SNC for violation of two or more-Level II criterion		
For more information on RNC, see EPA's 1990 <i>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</i>		
RNC WORKSHEET COMPLETED BY: Emily Poling		DATE: 8/31/26
TITLE: Environmental Specialist II		TELEPHONE: 740-380-5425