



# INDUSTRIAL PRETREATMENT PROGRAM ANNUAL EFFECTIVENESS REPORT 2014



**January 1, 2014 to December 31, 2014**

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**May 15, 2015**

**JOHN O. MOORE**  
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Mayor

May 15, 2014

Phoebe Low  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Subject: Annual Industrial Pretreatment Program Effectiveness Report 2014  
City of Akron Industrial Pretreatment Program  
Akron NPDES Permit No. 3PF00000\*ND

Dear Ms. Low:

Please find attached an electronic copy of the Annual Pretreatment Report for the City of Akron Industrial Pretreatment Program for the period January 1, 2014 to December 31, 2014. An electronic copy of the report is also being forwarded to Donna Kniss, Ohio EPA Northeast District Office.

Sincerely,

Frederick A. Neugebauer, P.E.  
Industrial Pretreatment Engineer  
Water Reclamation Facility

FAN:skp

Enclosures

c: Donna Kniss/Ohio EPA-NEDO  
J. Moore  
B. Gresser, P.E.  
K. Richards

**INDUSTRIAL PRETREATMENT PROGRAM  
ANNUAL REPORT CERTIFICATION**

DATE: May 15, 2015

SEWER AUTHORITY NAME City of Akron

PERIOD COVERED BY REPORT January 1, 2014 TO December 31, 2014

WASTEWATER TREATMENT PLANT(S) INCLUDED IN PROGRAM: Water Reclamation Facility NPDES PERMIT NUMBER(S): OEPA3PF00000\*ND

**CONTACT PERSON:**

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I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION IN THIS REPORT AND ALL ATTACHMENTS. BASED ON MY INQUIRY OF THOSE PERSONS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION CONTAINED IN THE REPORT, I BELIEVE THAT THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

  
SIGNATURE OF OFFICIAL:

5/14/2015  
DATE:

**Brian M. Gresser, PE**

NAME:

**Water Reclamation Services Manager**

TITLE

## EXECUTIVE SUMMARY

The Clean Water Act of 1972 called for the U.S. EPA to develop national pretreatment standards. These standards are uniform national requirements that restrict the level of certain pollutants in the sewage from industries. All publicly owned treatment works (POTW) must enforce the federal standards, which consist of two sets of rules, 1) categorical pretreatment standards and 2) prohibited discharge standards. In addition the pretreatment program was required to develop local discharge standards.

Categorical pretreatment standards were developed for specific types of industries such as electroplaters, metal finishers, coil coaters, organic chemical manufactures, etc. These standards include regulation of specific pollutants and require the use of "best available treatment technology" for new sources and "best practical technology" for existing sources, prior to discharging to the sewer system. The promulgation date is used to determine if a source qualifies as an existing source. Prohibitive discharge standards apply minimum standards to all discharges to the POTW and prohibit types of discharge that could create a fire hazard, explosion hazard, corrosion, obstruction of flow, slug loadings, reactivity or fume toxicity.

The philosophy behind these national standards is to provide consistent application to all industrial users throughout the country. Local standards for POTWs were developed to prevent the introduction of pollutants into the sewer system that would interfere with the normal operation of the system or inhibit the biological process of the POTW. The second objective of local standards is to optimize the cost effective method of sludge disposal (beneficial sludge reuse - compost). The third objective is to prevent any discharge that would result in pass-through of any pollutant resulting in a permit violation or adverse water quality impact of the receiving stream.

The purpose of this annual report is to report on the overall effectiveness of the City of Akron Industrial Pretreatment Program as carried out by the Environmental Compliance Team (ECT or Team). The ECT is a part of the Water Reclamation Services, Water Reclamation Facility. This report provides a written description of the City's program in the main text (sections 1-5), required Ohio EPA Forms and general program information including the legal authority (ordinance), permit status, efforts to screen for unknown industrial discharges and a calendar of Inspections conducted at Permitted industries, in the Appendices A-D.

There are many activities in related programs that involve the ECT staff. These include the Storm Water Program, the Combined Sewer Overflow (CSO) Program, the Tributary Community Discharge Permit Program, the Tributary Community Permit Program and the Watershed Management Technical Assistance Program.

The following summarizes the 1) major end results, 2) current objectives, 3) activities, 4) 2014 activities and 5) 2015 priorities for the Industrial Pretreatment Program and related activities.

# Industrial Pretreatment Program

## Major End Results

The Industrial Pretreatment Program's "major end results" are a) National Pollutant Discharge Elimination System (NPDES) permit compliance, b) enforcement of federal pretreatment requirements and c) prevention of pass through, interference, inhibition and sludge contamination in regard to the Publicly Owned Treatment Works (POTW) including the Water Reclamation Facility (WRF).

## Current Objectives

In implementing its local pretreatment program (per 40 CFR 403.8), the City of Akron must:

- Locate all industrial users and identify the pollutants they discharge,
- Notify industrial users of applicable standards and requirements related to pretreatment,
- Issue discharge permits to industrial users classified by the POTW as a significant industrial user,
- Analyze self-monitoring reports and other notices submitted by its industrial users,
- Sample and analyze the discharge from industrial users and conduct surveillance and inspection activities,
- Investigate instances of noncompliance with pretreatment standards and requirements,
- Develop and enforce local limits to control the discharge of pollutants by its industrial users into its treatment plant and
- Effectively enforce all pretreatment standards and requirements.

## General Activities

General activities of the Industrial Pretreatment Program are:

- Permitting,
- Annual inspections
- Compliance monitoring,
- Enforcement (per Enforcement Response Guide),
- Lab work contract coordination,
- Spill response,
- Data management,
- Document management,
- Local limitation development and implementation and on-going evaluation,
- Discharge reviews,
- Non-significant industrial user reviews and monitoring,
- Underground Storage Tank (UST)/Groundwater Contamination cleanup project monitoring and inspections,
- WRF influent and pollutant removal efficiencies monitoring,
- Safety and training program and
- New and existing effluent guidelines review.

## 2014 Activities

During the year 2014 the Industrial Pretreatment Program:

- Used the Internet and the World Wide Web to network with other pretreatment programs,
- Conducted 53 annual inspections,
- Issued 21 notices of violations,
- Collected \$11,700 in fines from six (6) industrial users,
- Found three (3) incidents of industrial users in Significant Noncompliance (SNC),
- Reissued all Significant Industrial User Permits that expired during the year,
- Utilized lab work contract,
- Attended Northeast Section Ohio Water Environment Association (NESOWEA) Industrial User Workshop in Richfield,
- Continued implementation of the Dental BMP Program
- In conjunction with the Sewer Maintenance Division, and the Summit County Department of Public Health, continued the development of a program to control the discharge of fats, oils and grease from food service establishments focusing on trouble spots and new construction.

## 2015 Priorities

During the year 2015 the Industrial Pretreatment Program plans to:

- Participate in Ohio Water Environment Association (OWEA) and NESOWEA meetings and workshops,
- Participate in a Pretreatment Coordinators List,
- Participate in the National Association of Clean Water Agencies (NACWA) National Mercury Workgroup,
- Participate in the OWEA Inspector and Operator Certification Committees,
- Participate in the NESOWEA Industrial Waste Seminar / Pretreatment Committee,
- Continue background sampling program,
- Implement use of collection system pH monitoring to screen for illicit discharges,
- Continue the establishment of the Dental BMP,
- Continue investigation of possible sources of Mercury and
- Continue to assist in establishing the Fats, Oils and Grease control program.

# Stormwater Program

## Major End Results

The "major end results" of the Stormwater Program are reduction of discharge of pollutants from municipal separate storm sewer systems and implementation of the NPDES Permit storm water requirements and non-point source objectives.

## Current Objectives

The Stormwater Program requires:

- Industrial Stormwater Inspections,
- Illicit Discharge Investigations,
- Stormwater Quality Monitoring Program,
- NPDES Permit Issues - this includes several activities, a few of which involve:
  - o Defining the best management practices (BMP),
  - o NPDES reporting requirements,
  - o Water quality issues,
  - o Pollution Prevention Program,
  - o Stormwater modeling efforts and
  - o CSO related issues;
- Spill response and follow-up,
- Public participation,
- Permit negotiations,
- Determine program responsibilities related to various City Divisions and
- Mapping of problem areas.

## General Activities

General activities of the Stormwater Program include:

- Illicit connection screening program,
- Review of Code requirements and
- Implementation of those requirements.

## 2014 Activities

During the year 2014 the Storm Water Program:

- Submitted Industrial Pretreatment contributions to the Municipal Separate Storm Sewer System (MS4) Annual Report,
- Continued the MS4 Permit Dry Weather Screening Program,
- Continued the MS4 Permit Wet Weather Monitoring Program,
- Continued annual industrial surveys via the Stormwater Discharge Disclosure Declaration (SDDD)
- Continued response to investigate illicit or suspected illicit discharges to storm sewers on a complaint or discovery basis, and.
- Assisted with scheduling and conducting industrial facility stormwater inspections.

## 2015 Priorities

During the year 2015 the Stormwater Program plans to:

- Submit analytical data pertinent to the MS4 Annual Report, reporting on the previous calendar year to the Stormwater Engineer,
- Assist with mapping of MS4 including location of all outfalls from the MS4, drainage areas for each outfall, location of industrial stormwater permittees and the location of private and public post-construction control practices,
- Continue SDDD surveys to determine existence of NPDES permit coverage and a Stormwater Pollution Prevention Plan (SWP3)
- Continue inspections of industrial users with storm water permits to evaluate compliance with the NPDES permit,
- Continue MS4 Permit Wet Weather Monitoring Program and
- MS4 Permit Dry Weather Screening Program assistance as described in the Storm Water Annual Report.

# Combined Sewer Overflow (CSO) Program

## Major End Results

The "major end results" for the CSO Program include verifying a) that CSOs occurred only as a result of wet weather, b) compliance with technology based requirements and State Water Quality Standards, c) minimization of water quality, aquatic, biotic and human health impacts and d) compliance with NPDES Permit requirements and USEPA strategies.

## Current Objectives

As required by the NPDES Permit the City of Akron developed a CSO Operational and Maintenance Plan. This Plan outlines in detail the operations of the collection system that are necessary to insure that the system is maintained appropriately and utilized to its fullest extent. Also, the City completed an evaluation of any impacts to the receiving stream associated with CSOs. The issues dealt with include the following:

- NPDES Permit issues,
- Coordination with various Bureaus and Divisions,
- Reporting requirements,
- Future planning, design and construction,
- Water quality and recreational use issues and
- Public participation.

## General Activities

General activities of the CSO Program in support of these objectives include:

- Assembling the CSO Operations and Maintenance (O&M) Manual,
- Reviewing CSO strategies,
- Water Reclamation Services coordination with the Engineering Bureau on the implementation of CSO related capital projects,
- Implementing Nine Minimum Controls oversight and
- Maintaining a CSO hot line and public notification service.

## 2014 Activities

During the year 2014 the CSO Program:

- ECT completed a review of the Facilities Plan.

## 2015 Priorities

During the year 2015 the CSO Program plans to:

- Participate in Technical Advisory Groups and Public Meetings and continue to review the Facilities Plan and
- Provide technical support with respect to Industrial Dischargers to the Ohio Canal Interceptor Tunnel Project

# Tributary Community Permit Program

## Major End Results

The "major end results" of the Tributary Community Permit Program are a) NPDES permit compliance and b) reduce inflow and infiltration and control separate sanitary sewer overflows.

## Current Objectives

As required by the 1994 NPDES Permit, the City of Akron is required to develop and implement a wet weather permitting system for control of inflow and infiltration and separate sanitary sewer overflows for the County of Summit and Suburban master meter customers. This system is referred to as the Tributary Community Permit Program and these objectives are accomplished through:

- The Annual Report,
- Maintaining Project list and compliance schedules and
- Implementation of Community Compliance Plan per City Code.

## General Activities

General Activities of the Program that support these objectives include:

- Fact Sheets, permits, program development,
- Code requirements,
- Program management and
- Permit to Install (PTI) evaluations/flow trade-off.

## 2014 Activities

During the year 2014 the following activities were conducted for this program:

- Submitted annual report,
- Documented the progress toward elimination of SSOs in tributary communities and
- Documented the progress toward elimination of CSOs in tributary communities.

## 2015 Priorities

During the year 2015 the program plans to:

- Submit annual report.

# Watershed Management

## Major End Results

The City will be involved in the development of watershed based programming in the programs listed previously and all watershed activities. This includes planning various remedial action plans, construction activities and public participation and education.

## Current Objectives

The current objective of the Watershed Management Program is to provide technical guidance to the Public Service Director and Water Reclamation Services Manager in areas involving environmental issues including, but not limited to: water quality issues, NPDES Permit, existing and proposed state and federal rules and regulations, surface water toxicity control, Total Maximum Daily Loading (TMDL) issues and any associated issues arising from the Clean Water Act, Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, Clean Air Act and Pollution Prevention. The Program also provides technical guidance to other City Departments, Bureaus and Divisions, including but not limited to, the Public Works Department, other Bureaus in Public Service Department, and the Fire Department.

## Activities

Watershed Issues this Team participates in include:

- USEPA Consent Decree (technical assistance, onsite system evaluation and status reports),
- Commenting on rules and regulation,
- Great Lakes Initiative,
- CSO Strategy,
- Clean Water Act,
- NPDES permit negotiations,
- Northeast Ohio Four County Regional Planning & Development Organization (NEFCO) and
- Local Emergency Planning Commission (LEPC).

## 2014 Activities

Activities during the year 2014 on Watershed Issues include:

- Four US EPA Consent Decree Quarterly Status Reports were submitted in 2013.

## 2015 Priorities

Priorities for the year 2015 on Watershed Issues are:

- Update and submit US EPA Consent Decree Quarterly Status Reports in a timely manner,

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Form AR-3 (5/89) .....	Industrial User Inventory and Monitoring
Form MOD-1 (9/90).....	Significant Industrial Users List
Form AR-4 (5/89) .....	Industrial Inventory Modification
Form AR-5 (5/89) .....	General Monitoring Information
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## **SECTION 1 INTRODUCTION**

The City of Akron's Environmental Compliance Team (ECT) prepares an effectiveness report detailing the activities of the Industrial Pretreatment Program for the preceding year. Section 1, Introduction, describes the purpose of the report, summarizes the program's effectiveness, lists program objectives for the current year and accounts for personnel resources available to the program. Section 2, Pretreatment Performance, includes the performance summary and the history of Industrial User (IU) noncompliance. Section 3 consists of the Industrial User inventory, monitoring program and local effects such as odors, spills and groundwater investigations. Section 4 contains the annual Pollution Minimization Program Report for mercury. Section 5, Program Evaluation, reviews the approved programs components, accomplishments and obstacles.

### **1.1 Purpose of Report**

The Annual Report is prepared and submitted to meet specific requirements from the Federal and State regulatory agencies in addition to providing program history and determination of program effectiveness.

This report also functions as the Service Director's Report to Akron City Council on the enforcement activities of the Industrial Pretreatment Program with respect to Sections 50.44 through 50.99 of the City's Code of Ordinances.

Brief summaries provided in the following introduction include a presentation of the Annual Report requirement, program history, overall effectiveness and other related activities involving the City's Environmental Compliance Team. Details illustrating program effectiveness are found in the various charts, graphs and Ohio Environmental Protection Agency (OEPA) required annual report forms.

#### **1.1.1 Annual Report Requirement**

The City of Akron currently operates an Industrial Pretreatment Program approved by the OEPA. The Industrial Pretreatment Program is the responsibility of the Environmental Compliance Team at the Akron Water Reclamation Facility (formerly known as the Akron Water Pollution Control Division). The overall program effectiveness during the year 2014 is discussed in detail in the following report. Areas evaluated include program effectiveness, personnel, pretreatment performance, Industrial User inventories, monitoring program and an evaluation of the overall program. The Code of Ordinances of the City of Akron, Ohio ("Code"), OEPA National Pollutant Discharge Elimination System (NPDES) Permit and the Federal Industrial Pretreatment Standards all require this Annual Effectiveness Report.

The Code, Section 50.48(D), requires that the Service Director evaluate and revise local limitations as required and report the findings to Akron City Council at least annually. The Annual Report fulfills this requirement.

The current OEPA NPDES Permit No. 3PF00000\*ND, effective June 1, 2014, requires an Annual Report per Part II. EE.9.b. The report is to provide a review of the effectiveness of the pretreatment program, prepared consistently with guidance provided by OEPA. The OEPA guidance includes: (1) Ohio EPA Pretreatment Program Reporting Guidance, September 1989 and (2) Ohio EPA Reporting Guidance and Modification Guidance, September 1990. The guidance requires a description of program progress, overall effectiveness, existing procedures,

resources and program priorities, accomplishments, problems and deficiencies and a recommended course of action for resolution. The following forms are to be included:

Form AR-1 (5/89)	Annual Report Certification
Form AR-2 (Rev 9/90)	Pretreatment Performance Summary
Form AR-3 (5/89)	Industrial User Inventory and Monitoring
Form AR-4 (5/89)	Industrial Inventory Modifications
Form AR-5 (5/89)	General Monitoring Information
Form AR-6 (5/89)	Upset, Interference and Pass-Through
EPA Form No. 4221	Priority Pollutant Scan
Form MOD-1 (9/90)	Significant Industrial Users List

These forms are located following Section 5 of the report in the section labeled "Ohio EPA Forms".

Also required by the NPDES Permit to be included in the Annual Report, is a copy of the most recent annual publication of the Industrial Users in Significant Noncompliance (SNC). A copy of this publication is found at the end of Section 2 of this report.

Finally, the Federal Pretreatment Standards, 40 CFR 403.12(i) requires an annual Publicly Owned Treatment Works (POTW) report. The report shall:

- Provide an updated list of POTW's Industrial Users, including the name, address, categorical standard and local standard,
- Provide a summary of the status of Industrial User compliance,
- Provide a summary of the compliance and enforcement activities, including inspections and
- Include any other relevant information.

The format provided in the City of Akron's Annual Effectiveness Report generally follows the State of Ohio's guidance, meeting the needs of the local Code and Federal requirements.

Several Industrial Users discharging to the Akron POTW are regulated and permitted with Summit County Department of Environmental Services. The reporting requirement for these industrial users was met by the Summit County Report dated February 3, 2015. The complete County Report is available for review at the Pretreatment Office upon request.

### **1.1.2 Program History**

The original Industrial Pretreatment Program was developed by the engineering consultant Dalton, Dalton, and Newport (currently URS/AECOM) under coordination of the Environmental Division of the Engineering Bureau. OEPA approved the program documents in 1985. The implementation of the program was assigned to the Industrial Pretreatment Section (IPS) of the Utilities Services Division of the Public Utilities Bureau. In 2003, the Industrial Pretreatment Section was combined with what was then "Laboratory and Field Operations" to form the Environmental Compliance Team (ECT).

Pretreatment programs were developed in the early 1980's to fulfill the requirements set forth by the United States Environmental Protection Agency, with emphasis on local limitations development and industrial inventories. Pretreatment Implementation Review Task Force (PIRT) revisions of 1985 resulted in amendments to the General Pretreatment Regulations in 1987 and 1988. The next regulatory change involved the Domestic Sewage Study of 1986 (DSS Revisions). As a result of the DSS, EPA promulgated amendments to the General Pretreatment Regulations on July 24, 1990.

In April 1989, the U.S. General Accounting Office (GAO) released a report entitled "Improved Monitoring and Enforcement Needed for Toxic Pollutants Entering Sewers." This report contributed to the October 1989 EPA enforcement initiative against POTW's. Currently the Industrial Pretreatment Program is being directed by the July 1991 Report to Congress, entitled "National Pretreatment Program" and the Pretreatment Program Streamlining Regulations.

On October 14, 2005, EPA published the Pretreatment Streamlining rule in the Federal Register (70 FR 60134-60198), effective November 14, 2005. On February 1, 2007 changes to the Ohio Administrative Code 3745-3 became effective, implementing the Pretreatment Streamlining Rule at the state level.

Several of these changes and reports required program modifications. The modifications for the formal Management Enforcement System (May 21, 1991) and revised Sewer Use Ordinance (March 4, 1991) received final approval in 1991. Also, the revised local limitations (approved in 1990) resulted in the reissuance of a majority of the Industrial User Discharge Permits in June 1991. In March of 2012, the City submitted Pretreatment Program modifications to implement the Pretreatment Streamlining Rule. This received conditional approval from OEPA. In December of 2012, Akron City Council passed all associated ordinance modifications, with final action by OEPA in the second quarter of 2013.

The City of Akron Management Enforcement System was developed to provide consistent and fair enforcement responses to instances of noncompliance. The Federal Requirement (40 CFR 403.8F(5)) includes:

- Procedures for investigating instances of noncompliance,
- Prescriptions of the types of escalating enforcement responses the POTW will take in response to anticipated types of Industrial User violations (including the time periods of each response),
- Identification of the official responsible for each type of response, and
- Adequate reflection of the POTW's primary responsibility to enforce all applicable pretreatment requirements and standards.

In addition to the Federal requirements, the City's system includes discussion of responsibilities and procedures, collection and dissemination of information, program activity and evaluation of the Sewer Use Ordinance. Copies of the Enforcement Management System "Red Book" were provided to all permitted Industrial Users.

The City's 1985 Codified Ordinances (Code) pertaining to Industrial Pretreatment was revised in late 1988 with the first submittal to EPA for comment as a program modification on February 2, 1990. The amended and/or supplemented Code was passed by City Council, approved by the Mayor and received OEPA final approval in 1991.

During 1994, additional modifications were made to the Code to incorporate storm water and tributary community regulations. In 2002 further modifications were made to the Code to enhance the City's authority to regulate the discharge of fats, oils and grease from food service establishments. Code modifications in 2012 allow for the implementation of Pretreatment Streamlining Regulations and the establishing a Fats, Oils and Grease (FOG) Program.

Code revisions are summarized as follows:

- Ordinance No. 546-1985 amending and/or supplementing Chapter 1044 of the Codified Ordinances of the City of Akron, 1975, offered by Bryant, 7-10-85 (Industrial Pretreatment),
- Ordinance No. 173-1991 amending and/or supplementing Title 5, Chapter 50 of the Code of Ordinances of the City of Akron, Ohio 1985, offered by Williams, 3-7-91 (Industrial Pretreatment),
- Ordinance No. 443-1994 amending and/or supplementing Title 5, Chapter 50 of the Code of Ordinances of the City of Akron, offered by Otterman, 6-16-94 (Storm Water),
- Ordinance No. 677-1994 amending and/or supplementing Title 5, Chapter 50 "sewer" of the Code of Ordinances of the City of Akron, offered by Bolden, 8-2-94 (Tributary Communities),
- Ordinance No. 67-2002 amending and/or supplementing Title 5, Chapter 50, Sections 50.46 "General Discharge Prohibitions" and 50.54 "Reporting Requirements" of the Code of Ordinances to establish numerical limits on wax, grease and oil discharges of animal or vegetable origin and to modify violation reporting requirement, offered by Horrigan, 2-8-02 (Industrial Pretreatment).
- Ordinance No. 412-2012 amending and/or supplementing Title 5 "Public Works", Chapter 50 "Sewers", Section 50.45 "Definitions", Section 50.46 "General discharge prohibitions", Section 50.47 "Limitations on wastewater strength", Section 50.51 "Accidental discharges", Section 50.52 "Wastewater discharge permit required", Section 50.53 "Permit application and conditions", Section 50.54 "Reporting requirements", Section 50.55 "Monitoring facilities", Section 50.68 "Annual publication", Section 50.69 "Records retention", Section 50.70 "Recovery of costs incurred by city" and, enacting a new Section 50.77 "General wastewater discharge permits", enacting a new Section 50.81 "Discharge criteria for fats, oil and grease", and amending and/or supplementing Section 50.99 "Penalty", of the Code of Ordinances of the City of Akron to revise regulations pertaining to industrial pretreatment and to the discharge of fats, oils and grease, offered by Jones, 12-10-12.

A web reference to current Code is provided in Appendix A. In order to provide information on the development and application of local limitations a summary of the local limitations has been included with the Code.

The local limitations underwent a formal and detailed review in July 1989 with revisions in November 1989 and June 1990. OEPA approved these limitations on October 31, 1990. They became effective with the adoption of the Revised Ordinance by Akron City Council and the reissuance of Industrial User Discharge Permits. The City of Akron was issued a new OEPA NPDES Permit with Director's Findings and Orders effective on September 30, 1991. The

Findings and Orders required the City of Akron to evaluate the adequacy of local Industrial User limitations to attain compliance with final table limitations. A Program Modification Request was submitted to OEPA on April 21, 1992 and approved on September 15, 1992. As required by the City's NPDES Permit, effective November 1, 1994, a review and technical justification was conducted in 1994/95 and submitted on May 1, 1995. OEPA approved the modification request on September 26, 1995.

As part of arsenic pollution minimization efforts, the arsenic limits as developed in the May 1, 1995 submittal were effectively enforced beginning in November of 2000. In addition, an action level of 10 µg/L arsenic was established in order to single out the most significant dischargers of arsenic.

The City's previous NPDES Permit, expired since April 1, 1998 was renewed with an effective date of September 1, 2010. As a result the local limits were evaluated, as required, with preliminary submittal to OEPA on February 1, 2012. Concurrently, the City submitted proposed modifications to the program to implement Pretreatment Streamlining Regulations. In August of 2012 the City also submitted a local limits justification for Mercury that proposed implementation of Best Management Practices (BMP) requirements in lieu of a numerical local limit. In May 2012 the City received preliminary approval of the local limit modifications as proposed. Final approval of the local limits modifications was received in the second quarter of 2013, concurrent with the pretreatment program modifications incorporating Streamlining Regulations. These modified local limits were incorporated into all industrial user permits by the end of 2013 except for those being renewed in 2014.

In 2013 the City requested and received approval from OEPA the authority to establish a local limit for ethyl benzene. This was necessitated when a SIU, previously regulated exclusively by the Rubber Manufacturing Point Source Category (40CFR428), added a manufacturing process regulated by the Organic Chemicals, Plastics and Synthetic Fibers Category (40CFR414), which has a standard for ethyl benzene. It was necessary to establish a local limit for ethyl benzene to be applied to the 40CFR428 wastewater in the combined waste stream formula.

The current Local Limitations Technical information is summarized on Table 1-1 found at the end of this section. Section 1.2.2.1 provides the technical justifications for the continued use of these local limits.

It should be noted that permitted loadings of parameters as contained in Table 1-1 are inflated with non-discharged categorical standards. Categorical Industrial Users (CIUs) are allocated for all categorical parameters, regardless of whether or not that parameter is present in the industries' effluent in excess of background concentrations. Metal Finishers and Electroplaters typically deal with only a few of the designated heavy metals. The other heavy metals are not contained in the parts being plated or in the process chemicals used. For example, despite 60% of the Allowable Headworks Loading being allocated, silver is always non-detect in the Metal Finishers discharge and is never detected in the wastewater plant's influent. It was anticipated that the adoption of certification of non-discharge in lieu of assigned limits for these parameters would result in a more realistic portrayal of the allocations. But to date none of the CIUs have requested such exemptions.

Finally, the reissuance of Industrial User Discharge Permits utilized a revised permit to reflect changes in Federal regulations, Code and local limitations. On May 4, 1992, OEPA requested that the revised permits be submitted as Program Modification. This modification was submitted to and approved by OEPA on May 15, 1992 and September 15, 1992, respectively.

The "Approved Pretreatment Program" as of May 1, 2014 is summarized in Table 1-2.

**Table 1-2**  
Approved Pretreatment Program  
as of May 1, 2014

<u>Original Program</u>	<u>Program Modification</u>
City of Akron, Municipal Pretreatment Program Final Program Application October 31, 1985 (received January 24, 1986)	<b>Ordinance:</b> OEPA approval August 2, 1994, amending and supplementing of the Industrial Pretreatment Program section of the Code of Ordinances of the City of Akron, Chapter 50.44 through 50.99.
City of Akron, Municipal Pretreatment Program Appendix A - Industrial User Volume I October 31, 1985 (received January 24, 1986)	Entitled: Ordinance No. 173-1991
City of Akron, Municipal Pretreatment Program Appendix A - Industrial User Survey Volume II October 31, 1985 (received January 24, 1986)	<b>Enforcement Management System:</b> OEPA approval May 21, 1991, incorporate the City of Akron's Enforcement Management System.
City of Akron, Municipal Pretreatment Program Appendix B - Technical Information October 31, 1985 (received January 24, 1986)	Entitled: Enforcement Management System, September 1990, revised January 1991 (Red Book).
City of Akron, Municipal Pretreatment Program Appendix C - Program Management October 31, 1985 (received January 24, 1986)	<b>Local Limitations:</b> OEPA approval September 26, 1995, May 1, 1995, revised local limits, technical information, May 1995.
City of Akron, Municipal Pretreatment Program Response to OEPA and USEPA Comments Addendum No. 1 to Final Program Application March 1, 1985 (received January 24, 1986)	OEPA Approval, March 19, 2013 for Cadmium, Chromium, Copper, Cyanide, Mercury and Nickel
	OEPA Approval, May 28, 2013 for Cadmium
	OEPA Approval, December 13, 2013 for Ethyl Benzene
	<b>IU Permits:</b> OEPA approval September 15, 1992, amending and supplementing of the Industrial Pretreatment Program Wastewater Discharge Permits (Control Mechanisms).
	Entitled: Modification Request, Industrial Pretreatment Program Control Mechanisms, May 13, 1992.
	<b>Pretreatment Streamlining:</b> OEPA Approval March 19, 2013 Including modifications to the Ordinance, Enforcement Management System and Permit
	<b>SIU List:</b> Significant Industrial User List, December 31, 2013. Included in Annual Effectiveness Report 2013

Beginning in 2006 the Industrial Pretreatment Program began implementing some of the required changes for implementation of the Pretreatment Streamlining Rule. Permit modifications were made to specifically enforce Slug Control Plan (SCP) requirements establishing periodic SCP review frequency and automatic SCP review triggers. The changes

were submitted to OEPA on December 6, 2006 and approved as a non-substantial program modification by OEPA on December 18, 2006. As of December 31, 2010 all control mechanisms have been updated to incorporate the SCP requirements.

Another adjustment made on the permits was changing the Self-Monitoring Report (SMR) due date from the last day of the reporting period to the last day of the month following the reporting period. This allows the permitted industry to sample up until the last day of the reporting period with adequate time for sample analysis and reporting within the prescribed time limits.

### **1.1.3 Overall Effectiveness**

The purpose of the Industrial Pretreatment Program is to enforce Federal Pretreatment Standards and local standards for the POTW. The Federal Standards include effluent guidelines (categorical pretreatment standards) and minimum requirements concerning prohibited discharge standards.

The effluent guidelines program is one component of the Nation's clean water program, established by the 1972 Clean Water Act (CWA), is authorized under sections 301, 304, 306 and 307 of the CWA and is founded on six core concepts. First, the program is designed to address specific industrial categories. Second, the guidelines specify the maximum allowable levels of pollutants that may be discharged by facilities within an industrial category or subcategory. These limits are based on performance of specific technologies. Third, each facility within an industrial category or subcategory must generally comply with the applicable discharge limits – regardless of its location within the country or on a particular water body. Fourth, EPA conducts the assessment of the effectiveness and economic achievability of the technologies, the basis for the limits. Fifth, the limits apply to existing facilities that discharge directly to surface waters (direct dischargers), existing facilities that discharge to POTWs (indirect dischargers) and newly constructed facilities (new sources) that discharge to surface waters either directly or indirectly. Finally, EPA annually reviews existing effluent guidelines and investigates the need for new effluent guidelines.

Prohibitive discharge standards apply minimum standards to all discharges to the POTW and prohibit types of discharges that could create a fire hazard, explosion hazard, corrosion, obstruction of flow, interference with operations or high temperatures. Prohibitive discharges have been expanded to include slug loadings, reactivity and fume toxicity through the PIRT and the DSS Revisions.

The development of Local Limits is required by Federal Law to address site-specific concerns. These concerns include correction of existing problems impacting the POTW, prevention of potential problems, protecting the receiving waters, improvement of sludge disposal options and protection of POTW personnel.

The 2014 Annual Effectiveness Report for the City of Akron's Industrial Pretreatment Program describes the program progress and overall effectiveness for that year. The program's successful operation is a vital component in the operation of the sewerage system and the Akron Water Reclamation Facility (WRF).

As a testimony to the effectiveness of the Industrial Pretreatment Program, the Akron Water Reclamation facility is again eligible for the Silver Award. The Akron WRF has received either the Gold or the Silver Award from the National Association of Clean Water Agencies (NACWA) for each of the past 14 years. The Gold is given to wastewater plants with no permit violations, while the Silver Award is given to wastewater plants with less than five permit violations for the year. In all of this time, none of the NPDES Permit violations incurred were due to pass through

or interference related to industrial discharges. While these awards directly reflect on the effective operations at the plant, the awards would not have been possible without an equally effective Industrial Pretreatment Program.

The program year, January 1, 2014 through December 31, 2014, was a very successful and productive year for the City's Industrial Pretreatment Program. Continued Industrial User compliance is shown on the OEPA quarterly violation reports submitted in March, June, September and December. The details on compliance are given in Section 2. It is believed that the policy of administrative fines, the increased environmental awareness of the Industrial User and knowledge of the City's position on increased notification of Industries in noncompliance in the local newspaper, effectively encourages compliance.

An additional program success is in the area of staff training and education. Nine of the ten members that comprise the Environmental Compliance Team hold a State of Ohio Wastewater Operator License, including five Class III, two Class II and one Class I certification. There are also six members with Lab Analyst Certifications, specifically four Class IV, one Class II and one Class I certifications. In addition, five members of the Environmental Compliance Team are certified as Pretreatment Facility Inspectors through a program offered by the University of California, Sacramento – Office of Water Programs. Staff also receives continuing education through participation in the following committees, seminars, workshops and training courses, which can include:

- Ohio Water Environment Association (OWEA), Northeast Section of the Ohio Water Environment Association (NESOWEA) and Operator Training Committee of Ohio (OTCO) offered courses,
- U.S. EPA & Ohio EPA offered web casts including topics such as: Industrial Pretreatment Program, Watershed Academy, Stormwater and Green Infrastructure
- Water Environment Federation (WEF) offered seminars and web casts.
- Waste Water Industry Resource Provider Workshops
- Participation in the Lab Analyst Committee, the Industrial Waste Seminar / Pretreatment Committee, the Industrial Inspector and Voluntary Wastewater Laboratory Analyst Certification Programs.
- Software and soft skills training offered through the city,
- Ongoing site-specific safety training
- Certification Training Programs offered by the University of California, Sacramento Office of Water Programs, including Pretreatment Facility Inspection, Metals Waste Treatment and Industrial Waste Treatment.

This training has had a positive impact on the Pretreatment Program implementation and management. Detailed memos are available for review on the individual activities. Vital information has been forwarded to the industrial users and several of our industries have benefited from these certification programs.

In 2014, the Industrial Pretreatment Engineer participated in a statewide OWEA committee, the purpose for which is to maintain Certification Programs for both Industrial Pretreatment Operators and Industrial Pretreatment Inspectors. These programs assist the City of Akron and

all approved pretreatment programs throughout the state, in their efforts to provide permitted industries with the necessary tools to facilitate consistent compliance with permit requirements. Certification could be a significant part of environmental management or ISO 14000 certification efforts. The availability of certification gives approved pretreatment programs and state run pretreatment programs an effective enforcement option, particularly when lack of knowledge and/or ability is determined as the primary reason for inconsistent compliance records. It also elevates the status of the Industrial Pretreatment Operator, establishing a minimum competency requirement and reducing the expendability of the individual performing these responsibilities. Inspector Certification provides the City of Akron's Industrial Pretreatment Program and other Pretreatment Programs in the state with a target level of competency for inspectors, which should result in increasingly effective inspection and enforcement activities.

Also in 2014, the Industrial Pretreatment Engineer served as a member of the Industrial Waste / Pretreatment Committee. The purpose for this committee is to plan the annual Industrial Waste Seminar, which brings industrial personnel responsible for pretreatment together with pretreatment program coordinators, state regulatory personnel and vendors of environmental related goods and services.

#### **1.1.4 Review of 2014 Program Objectives (Activities)**

The 2013 Annual Effectiveness Report included a list of 2014 program goals intended to continue to improve the City of Akron Industrial Pretreatment Program and for the implementation of regulatory requirements. The following reviews each program objective (priority) along with its current status for the Industrial Pretreatment Program and related activities as conducted by the Environmental Compliance Team (ETC).

##### **1.1.4.1 Industrial Pretreatment Program**

The Industrial Pretreatment Program's mission is to prevent interference, pass-through and sludge contamination while meeting regulatory requirements of the Clean Water Act.

##### **1.1.4.1.1 Assessment of Proposed 2014 Goals**

The following lists Proposed 2014 Goals and the status of those objectives. They are not necessarily in order of priority.

<b>OBJECTIVE</b>	<b>STATUS</b>
Implement Pretreatment Streamlining	Pretreatment Streamlining changes were implemented in all permits renewed during 2014 where appropriate.
Renew permits in a timely manner	All permits that expired during 2014 were renewed on time.
Conduct background sampling program, including a comprehensive screening for mercury with EPA Method 1669 for low level analysis.	Background sampling conducted at four sites throughout the city with up to four samples collected at each site including one day for low level mercury.
Continued Implementation of Dental BMP program	Packages were sent to all dentists in a tributary community not addressed in the initial mailing.
Continue pretreatment program staff training.	Discussed in section 1.1.3.

#### **1.1.4.2 Related Activities**

##### **FOG Program**

- Participated in development of this program
- Established the roll of the Industrial Pretreatment Program with regards to this program
- Established and maintained a cooperative working relationship with the local health department and building department and the Sewer Maintenance Division to optimize resources for establishing this program to include the development of forms, questionnaires and spreadsheets, to facilitate the program implementation.
- Reviewed plans to assure compliance with the objectives of this program
- Conducted inspections of food service establishments to address violations or historic trouble spots in the collection system

##### **Stormwater Program**

- Submitted Industrial Pretreatment contributions to the MS4 Annual Report,
- MS4 Permit Dry Weather Screening Program,
- MS4 Permit Wet Weather Monitoring Program,
- Continued annual industrial surveys via the Stormwater Discharge Disclosure Declaration (SDDD) and inspected industrial storm water permittees, and
- Continued response to investigate illicit or suspected illicit discharges to storm sewers on a complaint or discovery basis.
- Assisted with scheduling and conducting industrial facility stormwater inspections.

##### **Combined Sewer Overflow (CSO) Program**

- ECT completed a review of the Facilities Plan.

##### **Tributary Community Permit Program**

- Submitted annual report,
- Documented the progress toward elimination of SSOs in tributary communities and
- Documented the progress toward elimination of CSOs in tributary communities.

##### **Watershed Management**

- Four US EPA Consent Decree Quarterly Status Reports were submitted in 2014.

## **1.1.5 Proposed 2015 Program Objectives (Priorities)**

### **1.1.5.1 Industrial Pretreatment Program**

The following are proposed objectives or goals for the Industrial Pretreatment Program in 2014.

- Renew permits in a timely manner.
- Conduct background sampling program, including a comprehensive screening for mercury with EPA Method 1669 for low level analysis.
- Continued implementation of Mercury Pollution Minimization Program
- Continue pretreatment program staff training.

### **1.1.5.2 Related Activities**

The following proposed objectives (not in order of priority) will be a goal for the related activities of ECT Staff.

#### **FOG Program**

Proposed objectives for the FOG Program are as follows:

- Participate in the continued development of this program,
- Work towards establishing a comprehensive inventory of food service establishments (FSEs) including information on grease removal devices and operating practices with respect to those devices,
- In cooperation with the local health district assess voluntary cooperation of FSEs with ordinance mandated cleaning frequency of grease removal devices and
- Investigate and abate incidents resulting from non-compliance with FOG regulations.

#### **Stormwater Program**

Proposed objectives for the Storm Water Program are as follows:

- Submit analytical data pertinent to the MS4 Annual Report, reporting on the previous calendar year to the Stormwater Engineer,
- Assist with mapping of MS4 including location of all outfalls from the MS4, drainage areas for each outfall, location of industrial stormwater permittees and the location of private and public post-construction control practices,
- Continue SDDD surveys to determine existence of NPDES permit coverage and an SWP3,
- Continue inspections of industrial users with storm water permits to evaluate compliance with the NPDES permit,
- Continue MS4 Permit Wet Weather Monitoring Program and

- MS4 Permit Dry Weather Screening Program assistance as described in the Storm Water Annual Report.

### **Combined Sewer Overflow (CSO) Program**

Proposed objectives for the CSO Program are as follows:

- Participate in Technical Advisory Groups and Public Meetings and continue to review the Facilities Plan and
- Provide technical support with respect to Industrial Dischargers to the Ohio Canal Interceptor Tunnel Project

### **Tributary Community Permit Program**

Proposed objectives for the Tributary Community Permit Program are as follows:

- Submit annual report.

### **Watershed Management Technical Assistance:**

Proposed objectives for this area are as follows:

- Update and submit US EPA Consent Decree Quarterly Status Reports in a timely manner,

## **1.2 Program Effectiveness**

The program effectiveness is evaluated by examining the success and failures of the Industrial Pretreatment Program in regard to (1) meeting EPA regulatory requirements and (2) examining regulated parameters (i.e., local limitations and categorical standards).

### **1.2.1 Regulatory Requirements**

As the regulatory authority, the OEPA is required to determine the overall effectiveness of the POTW's Industrial Pretreatment Program (IPP). In December of 2011 OEPA conducted a Pretreatment Audit Inspection (PAI) of the City of Akron Industrial Pretreatment Program (IPP). The purpose of the inspection was to determine if the IPP is in compliance with state and federal pretreatment regulations and requirements.

The overall evaluation of the IPP is that it is operating very well, with excellent oversight of the Significant Industrial Users (SIUs). However, the PAI did reveal some deficiencies.

At least one permit appeared to have misapplied Existing Source Performance Standards to an SIU regulated by Metal Finishing Categorical Standards (40 CFR 433). This highlighted a need to review all industries regulated by this standard, and also by the Electroplating Standard (40 CFR 413) to assure appropriated implementation. As of the end of 2014 this review had been completed and all permits were corrected. Five of the eight SIUs regulated by 40 CFR 433 Existing Source Standards were affected. All of the industries regulated by 40 CFR 413 were correct.

It appeared that the Toxic Organics Management Plan (TOMP) for some SIUs had not been recently evaluated. Also the TOMP did not discuss how new toxic organic compounds would be prevented from being introduced into the wastestream. In response the City demonstrated to Ohio EPA that all required TOMPs were evaluated in conjunction with permit renewal cycles in compliance with our Enforcement Response Guideline. To address the second issue

associated with TOMPs the City updated the TOMP Form and had all affected SIUs update their plan with the new form.

An additional regulatory requirement added in 1990 was the submission of OEPA Form MOD-1. The form can be found in the EPA Forms Section following the text portion of the report. Form MOD-1 is the Significant Industrial User (SIU) List showing the name, address, SIU criteria, current status (de-list – yes or no) and if de-listed the reason for de-listing. This list summarizes the status of all SIUs, as of December 31, 2013.

### **1.2.2. Regulated Parameters**

The examination of regulated parameters includes local limitations developed by the POTW and Federal Pretreatment Standards or Categorical Limits.

#### **1.2.2.1. Local Limitations**

Examining the locally regulated and developed limitations best reflects the program effectiveness. The local limitations for the City of Akron were originally developed and approved by OEPA in 1985. The limitations require periodic review and revision if needed. A formal and detailed review was completed in July 1989, with revisions in November 1989 and June 1990. These limitations became effective with the adoption of the amended and supplemented Code of Ordinances by Ordinance No. 173-1991.

On September 30, 1991, an NPDES Permit became effective with subsequent Findings and Orders requiring the City to evaluate the adequacy of local Industrial User limitations to obtain compliance with final table limitations. Technical justification was required for cadmium, chromium, copper, lead, nickel and zinc. The Orders also required the review of the need for local limitations for arsenic, total cyanide, mercury, total phenolics and silver. OEPA approved the evaluation and review (submitted as a modification request on April 21, 1992) on September 15, 1992.

On November 1, 1994, a new NPDES Permit became effective requiring the City to evaluate the adequacy of local industrial user limitations to attain compliance with final table limitations and to protect the treatment system, sludge disposal options and worker health and safety. Technical justification was required for cadmium, chromium, copper, lead, nickel, zinc, arsenic, cyanide, mercury, silver, molybdenum and selenium.

The evaluation and review, along with a modification request, was submitted on May 1, 1995. OEPA approved the modification request on September 26, 1995.

Since that time and consistent with the recommendations from the 2004 US EPA Audit, the City evaluates the local limits on an annual basis. Every year and as part of this Annual Effectiveness Report actual plant operating data and permitted loadings from industry is compared with the Local Limits submittal, as found at the end of this section. Since the Local Limits submittal there have been no changes to limits on the wastewater plant effluent, or biosolids. The only aspect needing updated is the background sampling data.

In 2010 the City instituted a Background Sampling Program. Through use of the GIS, the IPP identified eight potential background-sampling locations throughout the collection system. These locations were distributed throughout the city in smaller subsystems presumably unimpacted by industrial discharges. The distribution was considered important in order to take into account the impact of potential difference due to the geographical, geological and demographical differences throughout the City. Field investigation eliminated two of the sites as

un-accessible. The remaining six sites were sampled six times in 2010 and analyzed for Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Nickel, Total Zinc and Total Cyanide. The sampling dates included one weekend date to account for that variable. This established a new and sufficient set of background data points. Five of those sites were sampled one more time in 2010 and analyzed for Mercury using EPA Method 1631 to get a snapshot of background mercury levels.

In 2012, one more background site was made available. This added site was sampled three times for heavy metals and total cyanide with an additional sampling event for mercury. In addition, the other six sites already sampled in 2010, were sampled again for low level mercury and three of them were sampled another six times for the non-mercury heavy metals parameters and for total cyanide. In 2014 three of the nine background sites were resampled four times. As presented in Table 1-6 at the end of this section, background results were consistent with background concentrations used in the 2011 local limitation calculations.

In the 1995 Local Limits review the City determined that enforcement of the local limit for arsenic was not warranted. However, when finished compost exceeded Arsenic limits in 1999 and again in 2000 the situation had changed. In response the IPS initiated an Arsenic Pollution Minimization Study. Subsequently IPS determined it was necessary to impose the arsenic local limit of 70 micrograms per liter ( $\mu\text{g/L}$ ) as evaluated in the 1995 study. In order to focus on the most significant sources an action level of 10  $\mu\text{g/L}$  limit was adopted. Any discharger expected to exceed the action level would be required to have a permit. This was not considered a significant modification requiring OEPA approval since the 1995 study on which the action was based, was approved by OEPA.

The new NPDES Permit required a new technical justification and determination of the adequacy of local limits because of more stringent discharge limits and to a lesser degree because of changes in the domestic background. As previously indicated, a program modification to implement new local limits was submitted to OEPA on February 1, 2011. In August of 2011 a program modification request was submitted for "BMP in lieu of a numerical limit". In March of 2013 the City received final approval of the limits along with the approval of Pretreatment Streamlining and FOG Program Ordinances, which were slated to receive concurrent final approval from OEPA. In September the City submitted a program modification to establish a local limit of 1.3 mg/L for ethyl benzene as previously discussed.

## **Flow**

The Akron Water Reclamation Facility effluent flow for the last three years (2012 – 2014) is shown on Figure 1-1 found at the end of this section. The average daily flow for 2014 was 74.4 million gallons per day (mgd). The current local limitations development, approved in March of 2013 utilized an average daily flow of 72.0 mgd. The average day design flow for the Akron WRF is 90 mgd.

## **Pollutant Removal Efficiencies**

Table 1-3 is a presentation of average removal efficiencies as measured in 2014. Table 1-3 also presents a summary of the wastewater plant effluent and sludge concentrations and the limitations imposed on those streams. As it can be seen in Table 1-3, the plant discharges were substantially less than limits imposed on those discharges.

**Table 1-3. Pollutant Removal Efficiency – Comparison to 2011 Local Limits Justification**

Pollutant	Removal Efficiencies (%)			Plant Effluent (µg/L)		Sludge (mg/Kg)	
	Local Limits Basis	Limiting Criteria	Year 2014 Average	Maximum Average	WLAV <sup>3</sup>	Max	Limit
Cadmium	70	Comp	88	0.16	5.8	3.33	39
Chromium	86	503	78	1.66	131	-	-
Copper	87	Int	86	11.8	24	367	1500
Lead	77	503	85	5.1	136	93.1	300
Nickel	30	Int	NV	<10	120	73.4	420
Zinc	72	Int	73	68	272	1670	2800
Mercury	95	WLAV	97	4.3 <sup>2</sup>	1.3	1.10	17.0
Arsenic	45	Int	-	-	135	13.5	41
Molybdenum	28	503	-	-	-	10.4	18
Selenium	50	503	-	-	-	1.25	100

<sup>1</sup> 503 = US EPA 503 Sludge Regulations, Comp = Class A Compost limits, WLAV = Waste Load Allocation Value, Int = Interference with treatment operations

<sup>2</sup> Analytical units for mercury are in ng/L

<sup>3</sup> Waste Load Allocation Values from 2010 NPDES Permit

In summary, the Industrial Pretreatment Program was effective in protecting the treatment works, assuring compliance with discharge limits for the parameters and also assuring maintenance of the most cost effective biosolids disposal options.

### Maximum Allowable Influent Concentration (MAIC)

Local limitations were developed based on pass-through criteria, inhibition and/or interference of the POTW and interference with sludge disposal. The pass-through criteria include the City's NPDES Permit limits and Water Quality Standards. Inhibition of the POTW includes the biological and nitrification treatment inhibition. Interference with sludge disposal includes the OEPA compost Class I requirements and the USEPA 503 Sludge regulations. The most stringent of the allowable concentrations for pass-through, inhibition and sludge criteria is the maximum allowable influent concentration (MAIC).

- **NPDES Permit** - In September of 2010 a new NPDES Permit was issued which resulted in no heavy metals parameters for which final effluent limits were established. Instead the city was given list of parameters requiring evaluation for the need for Local Limits with respect to waste load allocation values provided in the permit. There was no known exceedence of waste load allocation values based on pass-through caused by industrial discharges during 2014.
- **Inhibition/Interference** - There were no known instances of ongoing inhibition or interference requiring a change in local limitations. Any instances of interference or inhibition experienced by the POTW are detailed in the EPA Forms Section after the text portion of the report, EPA Form AR-6. The inhibition/interference criteria used in the development of the MAIC are from the inhibition threshold levels provided in the EPA Guidance Manual.
- **Sludge** – As of the end of 2013 all composting operations ceased, replaced entirely by anaerobic digestion. Biosolids results are reported up until and including July of 2014.

In the summer of 2014 the facility began drying and pelletizing the biosolids. These results were reported beginning in August of 2014. This explains the dramatic increase in concentration for all heavy metals with the exception of mercury. Heavy metal concentrations in the biosolids are being concentrated through the digestion process. In addition, there is no longer the dilution factor of bulking agents. Consequently the allowable loading of heavy metals is expected to be significantly less. It should be noted that despite the significant increase in metals concentrations the pelletized biosolids still meet the most stringent requirements of the highest quality biosolids. The current NPDES Permit is expiring in the summer of 2015. It is anticipated that the new permit will require a re-evaluation of local limits, at which point it will be determined if the change in biosolids process results in a change in local limits.

Compliance with the MAIC is demonstrated by a comparison of the Water Reclamation Facility influent concentration and the MAIC (theoretical). In practice, the performance of the plant influent concentrations with respect to MAIC is used to trigger source investigations when the concentrations consistently exceed 50% of MAIC. The influent concentrations have been maintained consistently well below the MAIC. Factors that minimize the influent concentration include new and existing industrial pretreatment systems; spill controls; waste minimization; pollution prevention, etc. The existing MAICs based on the 2011 local limitations are shown on the graphs at the end of this section.

A summary of the Akron Water Reclamation Facility operation data in regard to the locally regulated pollutants can be found on Table 1-4 (Influent, effluent and removal efficiencies), Table 1-5 (Biosolids Data) and on Figures 1-2 through 1-16, which can be found grouped together at the end of this section. Note: Measured pollutant concentrations cited in this report are monthly average concentrations, including all influent, effluent and biosolids measurements.

The Water Reclamation Facility compost and pelletized biosolids data are compared with the associated sludge limitation demonstrates compliance with OEPA Class A Compost and USEPA Sludge 503 Regulations. These comparisons are shown on Figures 1-2 through 1-16 found at the end of this section. The discussion that follows reviews each regulated sludge and/or compost parameter.

**Arsenic** -- The USEPA 503 Sludge Regulation limitation is 41 mg/kg. During the year 2014 the maximum arsenic loading in the biosolids was 14.9 mg/Kg with an average of 8.41 mg/Kg as compared to the 41 mg/kg limit.

Based on the performance of compost, there is significant excess capacity or safety factor in regard to this parameter.

**Cadmium (Cd)** -- The existing MAIC of 6.4 µg/L is based on Class A Compost Limits of 12.5 mg/kg. The average raw Cd level was 1.13 µg/L, which is 18% of MAIC. The maximum was 8.6 µg/L measured in October, which exceeds MAIC. But this result is considered to be an anomalous outlier. In November the influent Cd was measured at 2.60 µg/L, which is also significantly elevated above typical levels (< 1 µg/L). However, in both months Cd in the effluent was < 0.5 µg/L. Cd measured in the effluent at 0.16 µg/L in June. In every other month Cd levels were less than 0.5 µg/L. The waste load allocation value (WLAV) for Cd is 5.8 µg/L. (see in Table 1-4 and on Figure 1-3).

As can be seen in Table 1-5 and on Figure 1-4, biosolids concentrations averaged 2.14 mg/Kg, or less than 18% of the compost limit. The maximum, 3.33 mg/Kg, in August was still less than 27% of the compost limit. In October, the same month MAIC was exceeded; the biosolids concentration was only 2.98 mg/Kg

Based on the excess MAIC capacity and the corresponding performance of the biosolids, the limiting factor, there is significant excess capacity or safety factor in regard to this parameter.

**Total Chromium (Cr-T)** -- The MAIC of 159 µg/L as calculated in the March 1, 2011 Local Limit Report was based on the USEPA 503 Sludge Regulations of 1,200 mg/kg. The water quality standard for Total Chromium from the September 2010 NPDES Permit was 131 µg/L.

As can be seen in Table 1-4 and on Figure 1-5 monthly average influent concentrations for Cr-T (Cr-T) are well below MAIC. The average was 2.5 µg/L, which is less than 2% of the MAIC, with a maximum concentration of 6.2 µg/L in May.

The corresponding monthly average effluent data averaged 0.61 µg/L, which is less than 1% of WLAV for total chromium, with a maximum concentration of 1.66 µg/L.

Biosolids have not been analyzed for Cr-T since the Sludge Regulation was vacated.

Based on the excess MAIC capacity and the corresponding effluent concentrations there is significant excess capacity or safety factor in regard to this parameter.

**Copper** -- The MAIC of 88 µg/L is based on nitrification inhibition levels.

As can be seen in Table 1-4 and on Figure 1-6, the monthly average influent concentrations for copper are well below MAIC. The monthly average for copper averaged 42.7 µg/L, which is less than 49% of MAIC with a maximum average of 62.2 µg/L in May.

During all of 2014 copper was never detected above the reporting limit of 0.10 µg/L. By comparison, WLAV for Copper is 24 µg/L.

In August copper was measured in the effluent at 11.8 µg/L. Every other month copper was <10 µg/L. By comparison the water quality standard for copper is 24 µg/L.

The US EPA Sludge Regulation Limit is 1,500 mg/Kg. As can be seen in Table 1-5 and in Figure 1-7, biosolids concentrations were well below this limit averaging 231 mg/Kg, or less than 16% of the limit, with a maximum concentration of 367 mg/Kg recorded in December.

Based on the excess MAIC capacity and the corresponding effluent concentrations there is significant excess capacity or safety factor in regard to this parameter.

**Lead (Pb)** -- The MAIC of 44 µg/L is based on the USEPA 503 Sludge Regulations of 300 mg/kg.

As can be seen in Table 1-4 and in Figure 1-8, the monthly average influent concentrations for Pb was 9.0 µg/L, or less than 21% of the MAIC. A maximum concentration of 24.0 µg/L was measured in the influent in May.

As can be seen in Table 1-5 and in Figure 1-9, the biosolids concentrations averaged 51.8 mg/Kg, or less than 18% of the compost limit, with a maximum concentration of 93.1 mg/Kg measured in August.

The WLAV for Pb is 136 µg/L. Table 1-4 indicates that the monthly average effluent data averaged only 0.3 µg/L, or less than 1% of the limit, with a maximum concentration of 0.6 µg/L in October.

Based on the excess MAIC capacity and the corresponding performance of the compost, the limiting factor, there is significant excess capacity or safety factor in regard to this parameter.

**Nickel** -- The MAIC of 82 µg/L is based on the USEPA 503 Sludge Regulation of 420 mg/kg.

As can be seen in Table 1-4 and on Figure 1-10, for the entire year only in March was nickel detected, it was measured at 96.8 µg/L. That is considered anomalous, as the corresponding biosolids concentration was 11.6 mg/Kg. A review of Table 1-5 and in Figure 1-11 reveals that finished compost concentrations were well below the 503 Sludge limitations averaging 22.9 mg/Kg, or less than 6% of the limit. The maximum concentration of 73.4 mg/Kg was measured in December.

The corresponding monthly effluent was never detected above the reporting limit of 10 µg/L as compared to the WLAV Limit of 120 µg/L.

Based on the excess MAIC capacity and the corresponding effluent concentrations there is significant excess capacity or safety factor in regard to this parameter.

**Zinc** -- The MAIC of 382 µg/L is based on literature nitrification inhibition threshold.

As can be seen in Table 1-4 and in Figure 1-12, the monthly average influent concentrations for zinc are below MAIC averaging only 199 µg/L, or less than 52% of the MAIC, with a maximum concentration of 298 µg/L in March.

As seen in Table 1-5 and in Figure 1-13, the finished compost concentrations averaged 1116 mg/Kg, or less than 47% of the compost limit, with a maximum concentration of 1670 mg/Kg in December.

The WLAV Limit for zinc is 272 µg/L. As can be seen in Table 1-4 the monthly average effluent data averaged only 51 µg/L, or less than 19% of the limit, with a maximum concentration of 68 µg/L in March.

It should be noted that the predominant water supply for the area tributary to Akron WRF is dosed with zinc orthophosphate at a rate equivalent to approximately 500 µg/L zinc in 35 MGD water treated.

**Mercury** -- For a discussion of Mercury data, see Section 4.1.1.

**Cyanide (T)** -- The current local limit for Total Cyanide (CN-T) is 490 µg/L as calculated in the March 2011 Local Limit Report and is based upon a WLAV level of 5.7 µg/L, and the associated Maximum Allowable Influent Concentration (MAIC) of 18.4 µg/L. During 2014 Total Cyanide was never detected in the influent above the detection level of 10 µg/L.

**Molybdenum** -- The USEPA 503 Sludge Regulation limitation was 18 mg/kg. As shown in Table 1-5 and on Figure 1-15, the maximum and average sludge loading was 10.4 mg/Kg and 5.9 mg/Kg, respectively. No further action on Molybdenum is required at this time.

**Selenium** -- The USEPA 503 Sludge Regulation limitation is 36 mg/kg. The biosolids loading is very consistent and well below the limitation as shown on Figure 1-16. The 2014 results were significantly below the USEPA 503 Sludge Regulation limitation of 36 mg/kg. Selenium was detected in only four of the twelve months, with a maximum of 1.25 mg/kg, which is less than 4% of the sludge limitation. The other nine months the values were all less than 1.01 mg/kg. No further action on Selenium is required at this time.

### 1.2.2.2 Federal Categorical Standards

The City regulates through individual control documents (permits) twenty-five (25) Industrial Users classified as Categorical Industries as of December 31, 2013. Eight of these do not discharge to the sanitary sewer. The permits specify each applicable section and subsection, along with the combined waste stream formula if required.

A summary of each classification and corresponding industry follows:

#### **40 CFR Part 413 - Electroplating Point Source Category:**

MA-001 The Akron Plating Company, Inc  
SI-001 Akron Anodizing & Coating Company  
MI-006 Akron Metal Etching Company

#### **40 CFR Part 414 - Organic Chemicals, Plastics and Synthetic Fibers Category:**

MA-003 Emerald Performance Materials, LLC  
MA-008 OMNOVA, Mogadore  
MA-015 OMNOVA, Akron Plant

#### **40 CFR Part 433 - Metal Finishing Point Source Category:**

##### *Existing Source Pretreatment Standards (433.15)*

MA-002 Beringer Plating, Inc  
MA-009 Cornwell Quality Tool Company  
MI-035 Heritage Industrial Finishing Division – Englewood Avenue Facility  
SI-007 General Metals Powder Company

##### *New Source Pretreatment Standards (433.17)*

MA-004 Lockheed Martin MS2 - DSS  
MA-014 Via Systems  
MA-016 Meggitt Aircraft Braking Systems  
MA-017 H&M Metal Processing Company  
MA-018 Heritage Industrial Finishing, Inc.- Kelly Avenue Facility  
MA-020 Coltène Whaledent  
MI-092 Martin Wheel

Nine (9) Categorical Industrial Users have been either classified as Non-Discharging, Significant Industrial Users or operate as such. The City of Akron requires those industrial users that meet the characteristics of a Federal Category but with no process discharge to obtain permits. These industries are considered to be significant industrial users due to a reasonable potential, in the opinion of the Service Director, to adversely affect the POTW's operation, including sewer system operations, or for violating any pretreatment standard or requirement. Being permitted facilitates the City's goal to maintain a presence through annual inspections and enables the City to verify the non-discharging status by inspection of facilities and records indicating appropriate disposal of hazardous materials generated but not discharged to the sanitary sewer. The non-discharging permitted industries are listed as follows:

#### **Non-discharge - Electroplating Point Source Category (413)**

MA-006 The Plate-All Metal Company  
MA-007 Universal Plating, Inc  
MI-077 Tri-County Hard Chrome

#### **Non-discharge - Nonferrous Metals Manufacturing Point Source Category (421)**

MI-106 Auris Noble, LLC

**Non-discharge - Metal Finishing Point Source Category (433)**

MI-087 Integrated Roll Services  
MI-102 Weaver Fabricating and Finishing

**Non-discharge – Metal Molding and Casting Point Source Category (464)**

MI-097 Akron Foundry Company  
MI-103 King Model / King Castings

**Non-discharge – Coil Coating Point Source Category (465)**

MI-086 Grimco, Inc.

**1.3 Personnel**

The Environmental Compliance Team Leader supervises the individuals responsible for the activities required by the industrial pretreatment program. The Organizational Chart and Responsibilities are shown on Figure 1-17 found at the end of this section. The current staffing level is as follows:

Industrial Pretreatment Engineer  
Engineering Technician II  
Environmental Services Aide  
Lab Analyst III  
Lab Analyst II (5)

The Summit County Industrial Pretreatment Program is under the Operations Section Engineering Supervisor in the Department of Environmental Services. The normal staffing levels are as follows:

Industrial Pretreatment Coordinator

**Table 1-1**  
Local Limitations  
Technical Information  
December 31, 2014

<u>Pollutant</u>	<u>Background Concentration (µg/L)</u>	<u>Removal Rates (%)</u>	<u>Maximum Allowable Influent Concentration (µg/L)</u>	<u>Criteria</u>	<u>Maximum Allowable Industrial Loading (lbs/d)</u>
Cadmium	0.50	81	6.35	Sludge Regs	0.322
Chromium	10.	76	159.	Sludge Regs	81.2
Copper	49.	84	88.2	Interference	13.
Lead	23.	83	44.4	Sludge Regs	15.7
Mercury	0.20	95	0.0276	Water Quality	0.00
Nickel	10.	38	82.1	Interference	35.4
Zinc	180.	64	382.	Interference	65.
Cyanide, Total	3.0	69	18.4	Water Quality	3.89
Arsenic <sup>1</sup>	3.0	45	13.0	Anaerobic Digestion	1.86
Molybdenum	0.0	28	10.0	Sludge Regs	5.21
Selenium	4.0	50	11.0	Sludge Regs	3.95
Silver	5.0	75	2.85	Sludge Regs	1.54
Ethyl Benzene	0.0	100	2440.	Water Quality	1315.

<u>Pollutant</u>	<u>Existing Source Local Limit (mg/l)</u>	<u>Local Limits (mg/l)</u>	<u>Permitted Industrial Flow (mg/d)</u>	<u>Maximum Allowable Industrial Loading (lbs/d)</u>	<u>Permitted Industrial Loading (lbs/d)</u>	<u>Proposed Percent Allocated (%)</u>
Cadmium	0.20 - 0.50	0.090	<b>0.209</b>	0.322	<b>0.178</b>	<b>55.3</b>
Chromium	---	3.00	<b>0.239</b>	81.2	<b>5.47</b>	<b>6.74</b>
Copper	---	3.50	<b>0.294</b>	13.	<b>8.20</b>	<b>63.1</b>
Lead	---	1.5	<b>0.583</b>	15.7	<b>4.15</b>	<b>26.4</b>
Mercury	---	BMP	<b>0.000</b>	0.000	<b>0.000</b>	<b>0.00</b>
Nickel	---	3.50	<b>0.313</b>	35.4	<b>8.98</b>	<b>25.4</b>
Zinc	---	3.50	<b>1.232</b>	65.	<b>32.5</b>	<b>50.0</b>
Cyanide	---	0.490	<b>0.892</b>	3.89	<b>3.62</b>	<b>93.1</b>
Arsenic	---	0.07	<b>0.000</b>	1.86	<b>0.00</b>	<b>0.00</b>
Molybdenum	---	---	---	5.21	---	---
Selenium	---	---	---	3.95	---	---
Silver <sup>2</sup>	---	---	<b>0.182</b>	1.54	<b>0.627</b>	<b>40.7</b>
Ethyl Benzene	---	1.3	<b>0.940</b>	1315.	<b>4.85</b>	<b>0.37</b>

<sup>1</sup> Action Level Concentration of 10 µg/L used to trigger inclusion in permit requirements.

<sup>2</sup> Categorical Standard (40 CFR 433), but no actual dischargers

**Table 1-4**  
Akron Water Reclamation Facility  
Summary of Operational Data  
2014

2014	Average Influent Flow (mgd)	Cadmium			Chromium			Copper			Lead			Nickel			Zinc			Mercury		
		Raw	Final	η	Raw	Final	η	Raw	Final	η	Raw	Final	η	Raw	Final	η	Raw	Final	η	Raw	Final	η
		(μg/L)	(μg/L)	(%)	(μg/L)	(μg/L)	(%)	(μg/L)	(μg/L)	(%)	(μg/L)	(μg/L)	(%)	(μg/L)	(μg/L)	(%)	(μg/L)	(μg/L)	(%)	(ng/L)	(ng/L)	(%)
		Detect Level = 0.10			Detect Level = 0.25			Detect Level = 10.00			Detect Level = 0.25			Detect Level = 10.0			Detect Level = 10			Detect Level = 0.5		
January	72.5	0.29	AA	83	4.9	0.70	86	43.2	AA	88	6.1	0.7	89	AA	AA	NV	144	65	55	141.0	4.3	97
February	72.7	0.37	AA	86	3.9	0.59	85	45.6	AA	89	4.5	0.3	93	AA	AA	NV	273	66	76	31.7	1.5	95
March	75.5	0.41	AA	88	3.1	0.78	75	50.9	AA	90	6.0	AA	98	96.8	AA	95	298	68	77	70.5	1.8	97
April	105.2	0.25	AA	80	3.2	0.84	73	20.0	AA	75	14.6	0.3	98	AA	AA	NV	114	50	56	64.5	1.6	98
May	93.6	0.37	AA	86	6.2	0.60	90	62.2	AA	92	24.0	0.5	98	AA	AA	NV	225	41	82	84.0	3.0	96
June	70.9	AA	0.16	NV	AA	0.71	NV	36.1	AA	86	11.7	0.3	97	AA	AA	NV	173	36	79	36.2	1.4	96
July	71.6	0.20	AA	75	3.5	1.66	53	47.9	AA	90	4.7	AA	97	AA	AA	NV	201	39	80	89.0	2.1	98
August	72.7	0.78	AA	94	5.1	0.90	82	38.7	11.8	70	16.9	0.7	96	AA	AA	NV	185	38	79	157.0	2.7	98
September	60.3	AA	AA	NV	AA	AA	NV	40.0	AA	88	2.4	AA	95	AA	AA	NV	150	43	71	56.2	2.7	95
October	60.0	8.20	AA	99	AA	AA	NV	42.0	AA	88	8.2	3.7	55	AA	AA	NV	210	49	77	119.0	1.6	99
November	58.4	2.60	AA	98	AA	AA	NV	42.0	AA	88	2.6	3.9	NV	AA	AA	NV	240	48	80	76.4	3.0	96
December	60.6	AA	AA	NV	AA	AA	NV	44.0	AA	89	6.3	5.1	19	AA	AA	NV	170	68	60	33.2	1.6	95
<b>2014 Minimum</b>	58.4	0.20	AA	75	3.1	AA	53	20.0	AA	70	2.4	AA	19	AA	AA	NV	114	36	55	31.7	1.4	95
<b>2014 Maximum</b>	105.2	8.20	0.16	99	6.2	1.66	90	62.2	11.8	92	24.0	5.1	98	96.8	AA	95	298	68	82	157	4.3	99
<b>2014 Average</b>	72.8	1.13	AA	88	2.5	0.61	78	42.7	AA	86	9.0	1.3	85	AA	AA	NV	199	51	73	79.9	2.3	97
<b>2014 Std Dev.</b>	14.0	2.62	NV	8	1.2	0.35	12	9.9	NV	7	6.6	1.9	25	NV	NV	NV	54.0	12	10	41.1	0.9	1.2
<b>2013 Average</b>	69.1	0.72	AA	74	3.5	0.58	81	36.9	AA	86	8.0	0.3	94	AA	AA	NV	200	46.0	76	49.2	2.1	92
<b>2013 Average</b>	71.9	0.36	0.08	72	4.7	0.70	80	35.5	5.4	86	6.5	2.3	67	14.6	12.5	NV	203	59.0	70	45.5	2.2	97
<b>2012 - 2014 Average</b>	71.3	0.74	AA	78	3.6	0.63	80	38.4	AA	86	7.8	1.3	82	15	13	NV	201	52	73	58	2.2	95

"Raw" samples collected at sample location 601.

"Final" samples collected sample location "602", which is after the secondary clarifiers and just prior to chlorination.

$\eta \equiv$  Removal Efficiency = (Raw-Final)/Raw X 100

AA = Non-Detect. If Final discharge average for month is AA, 1/2 Detect Level is used for calculation of removal efficiency.

NV = Removal Efficiency Calculation or Standard Deviation Calculation Not Valid due to predominance of data being near, at or below detection limit.

The Average Removal Efficiency is an average of the monthly removal efficiencies.

**Table 1-5**  
Akron Water Reclamation Facility  
Summary of Biosolids Data  
2014

2014		Arsenic (mg/Kg)	Cadmium (mg/Kg)	Chromium (mg/Kg)	Copper (mg/Kg)	Cyanide (mg/Kg)	Lead (mg/Kg)	Mercury (mg/Kg)	Molybdenum (mg/Kg)	Nickel (mg/Kg)	Selenium (mg/Kg)	Zinc (mg/Kg)	Solids (%)
<b>Sludge Limit</b>		41.0	39.0	---	1500	---	300.0	17.0	18.0	420.0	100.0	2800	---
<b>Compost Limit</b>		---	12.5	---	---	---	500.0	---	---	---	---	---	---
January	COMPOST	6.69	1.53	---	148	---	35.7	0.32	3.82	11.1	AA	713	---
February		5.06	1.76	---	173	---	13.2	0.32	4.31	13.2	1.16	806	---
March		4.80	1.82	---	163	---	40.2	0.44	4.23	11.6	1.15	802	---
April		4.36	1.61	---	141	---	32.6	0.39	4.47	10.2	1.19	717	---
May		5.54	2.00	---	201	---	41.4	0.42	4.51	15.7	1.25	912	---
June		5.09	1.70	---	157	---	38.3	0.38	4.39	11.8	AA	827	---
July		5.31	2.53	---	136	---	32.0	0.41	3.13	9.74	AA	1190	---
August	PELLETIZED BIOSOLIDS	13.50	3.33	---	304	---	93.1	AA	9.82	33.6	AA	1400	---
September		11.60	2.81	---	295	---	78.3	0.60	9.37	28.8	AA	1270	---
October		12.50	2.98	---	358	---	78.0	AA	10.4	29.8	AA	1550	---
November		9.53	2.73	---	326	---	66.9	AA	8.84	25.3	AA	1540	---
December		7.36	2.97	---	367	---	66.9	1.10	9.42	73.4	AA	1670	---
<b>2014 Minimum</b>		4.36	1.53	---	136	---	13.2	AA	3.82	9.74	AA	713	---
<b>2014 Maximum</b>		13.50	3.33	---	367	---	93.1	1.10	10.4	73.4	1.25	1670	---
<b>2014 Average</b>		7.61	2.14	---	231	---	51.4	0.47	5.9	22.9	NV	1116	---
<b>2013 Average</b>		4.49	1.50	---	129	---	30.4	0.33	3.42	9.5	NV	648	---
<b>2012 Average</b>		7.71	1.35	---	141	---	36.7	0.25	4.83	13.56	NV	754	---
<b>2012 - 2014 Average</b>		6.6	4.10	---	167	---	39.5	0.40	4.7	15.3	NV	839	---

AA: Arsenic = 2.0 mg/Kg, Cadmium = 2.0 mg/Kg, Mercury = 0.20 mg/Kg, Selenium = 2.0 mg/Kg

Note: "----" denotes not reported

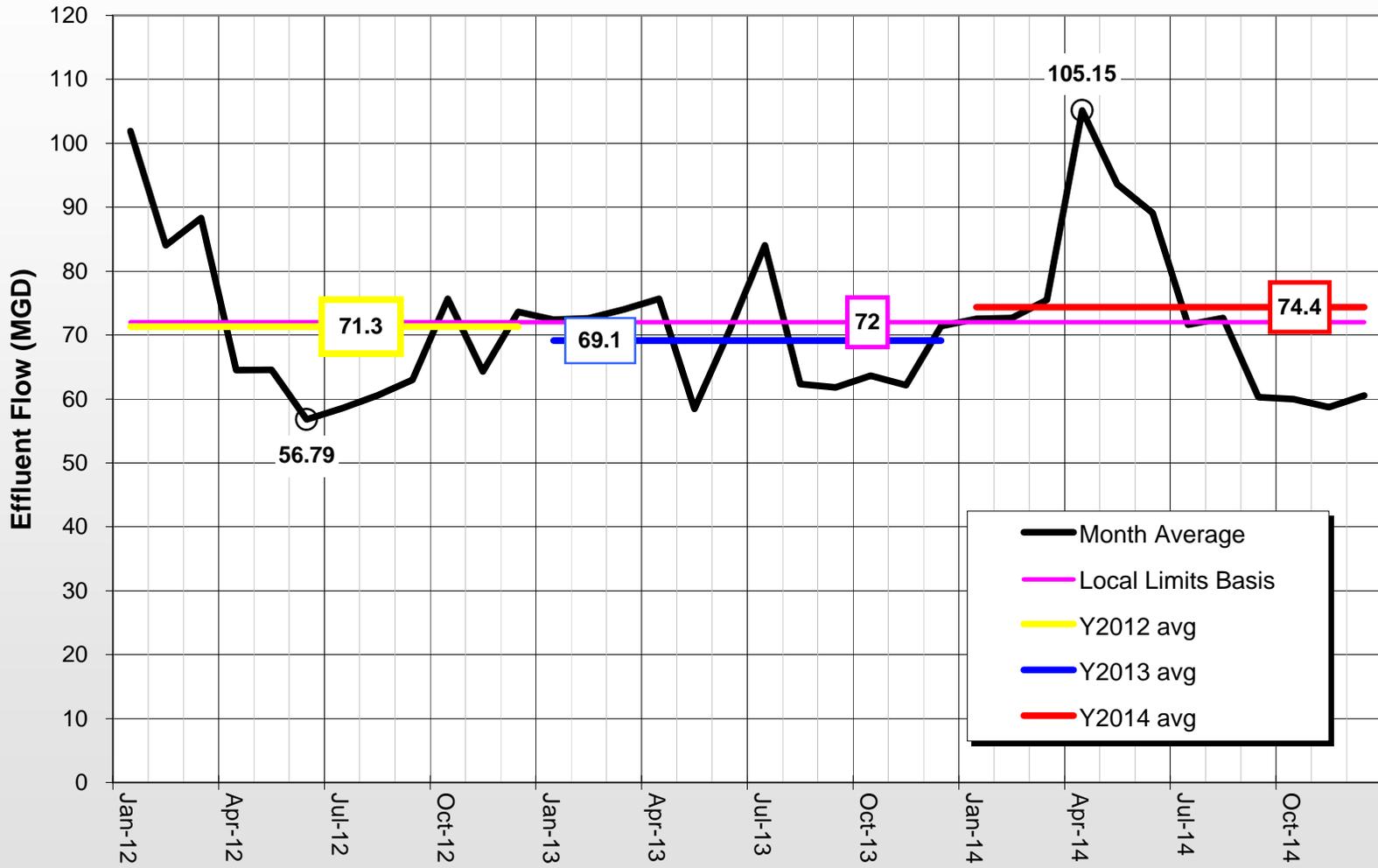
Nickel=2.0, Molybdenum=2.0

NV = Not Valid due to predominance of data being near, at or below detection limit.

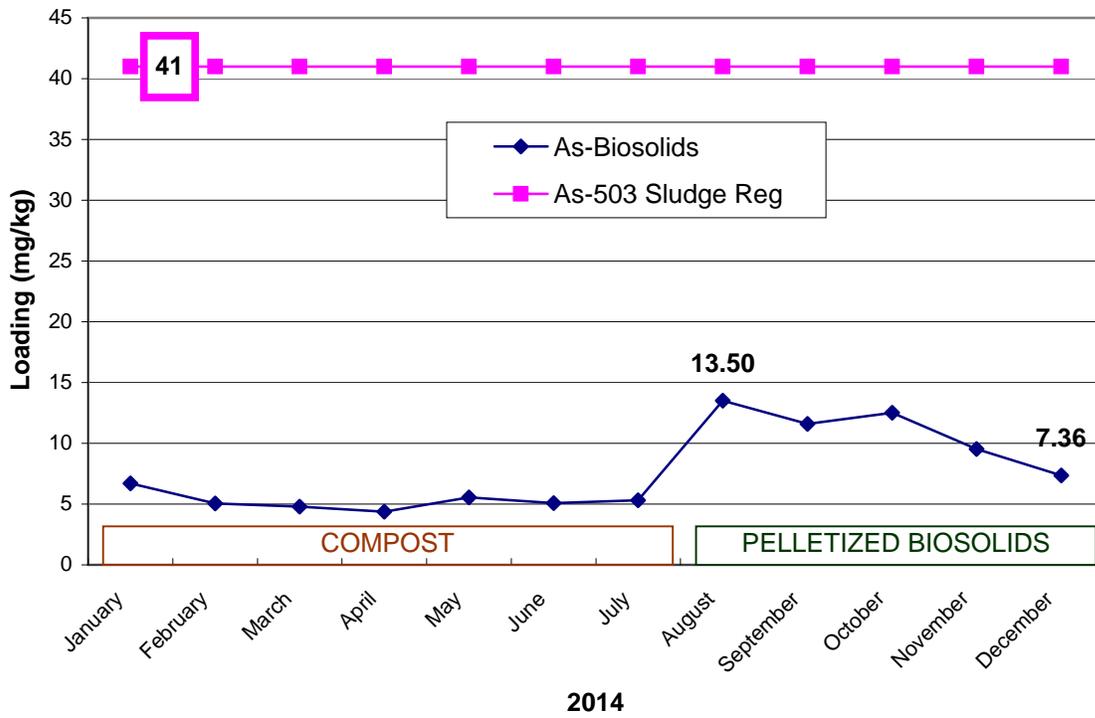
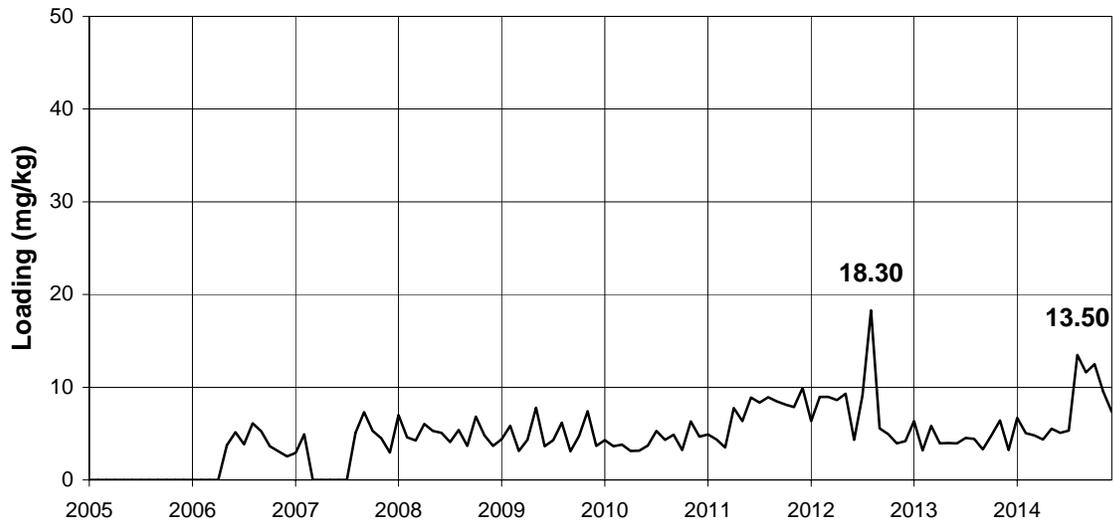
**Table 1-6**  
Akron Water Reclamation Facility  
Summary of Domestic Background Sampling Results  
2014

SITE	SAMPLE DATE	Arsenic mg/L	Cadmium mg/L	Chromium mg/L	Copper mg/L	Lead mg/L	Nickel mg/L	Zinc mg/L	Mercury ng/L
<u>BG-002: South Street</u>									
	07-27-2014	---	< 0.005	< 0.005	0.039	0.013	< 0.010	0.341	---
	07-29-2014	---	< 0.005	< 0.005	0.019	0.015	< 0.010	0.217	---
	07-30-2014	---	< 0.005	< 0.005	0.033	< 0.005	< 0.010	0.221	---
	07-31-2014	---	< 0.005	< 0.005	0.054	0.016	< 0.010	0.337	---
	08-01-2014	---	---	---	---	---	---	---	1.3
<u>BG-003: Newton Street</u>									
	08-04-2014	---	< 0.005	< 0.005	0.041	< 0.005	< 0.010	0.308	---
	08-06-2014	---	< 0.005	< 0.005	0.047	0.006	< 0.010	0.399	---
	08-07-2014	---	< 0.005	< 0.005	0.031	< 0.005	< 0.010	0.249	21.5
	08-08-2014	< 0.010	< 0.005	< 0.005	0.035	< 0.005	< 0.010	0.390	---
<u>BG-008: Cordova Avenue</u>									
	07-27-2014	---	< 0.005	< 0.005	0.028	< 0.005	< 0.010	0.135	---
	07-29-2014	---	< 0.005	< 0.005	0.014	< 0.005	< 0.010	0.088	---
	07-30-2014	---	< 0.005	< 0.005	0.011	< 0.005	< 0.010	0.078	---
	07-31-2014	< 0.010	< 0.005	< 0.005	0.063	< 0.005	< 0.010	0.174	---
	08-01-2014	---	---	---	---	---	---	---	8.15
<b>BACKGROUND PER LOCAL LIMITS</b>		0.005	0.0052	0.0081	0.058	0.014	0.015	0.240	25.4

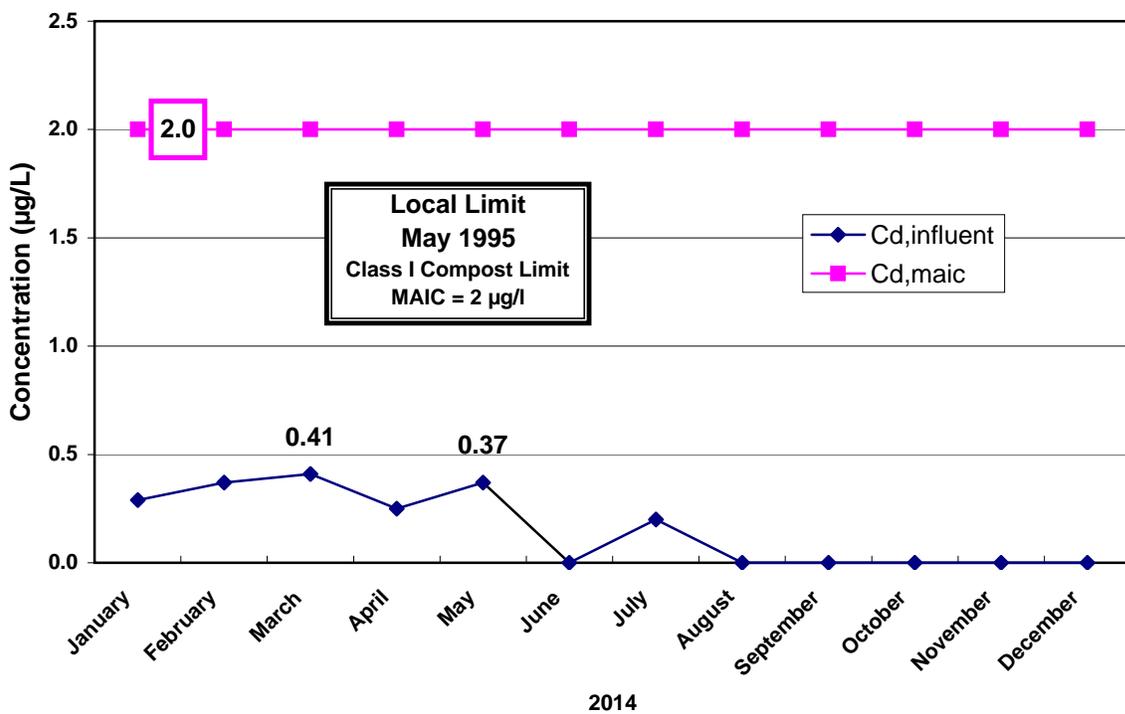
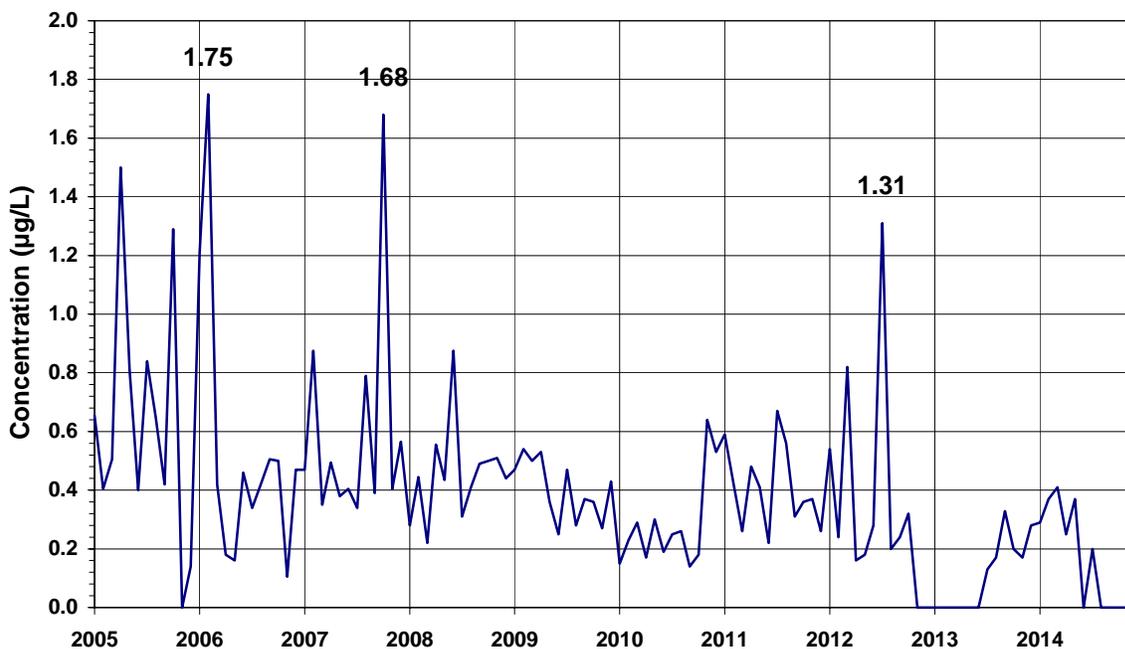
Figure 1-1. WRF Effluent Flow



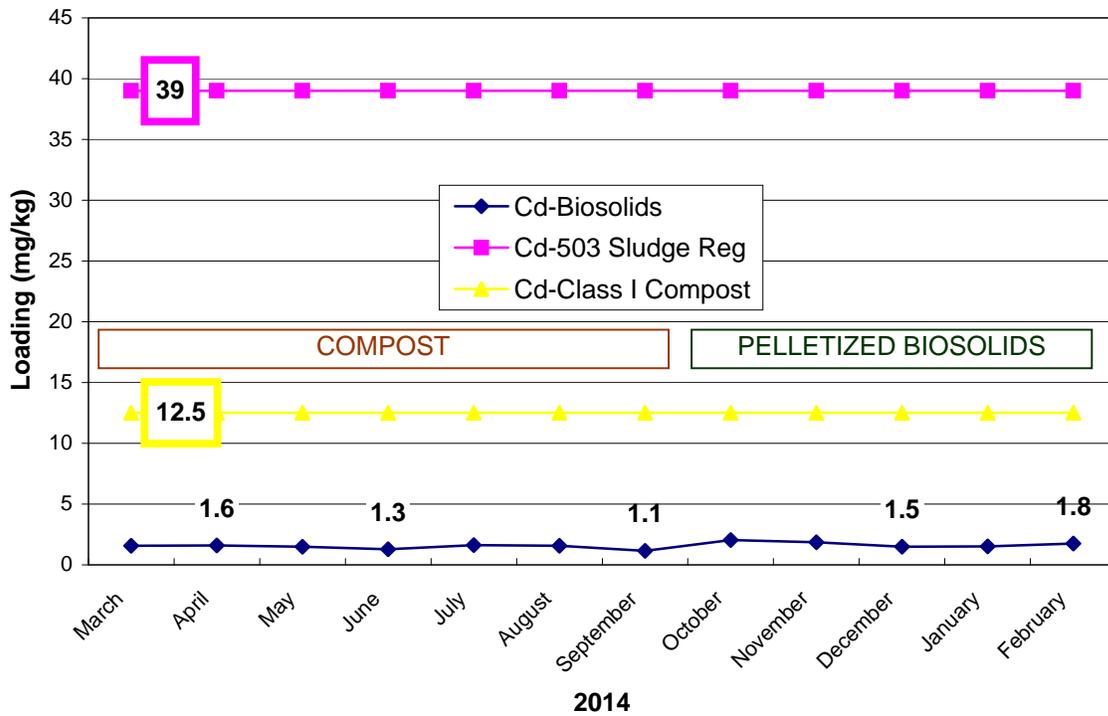
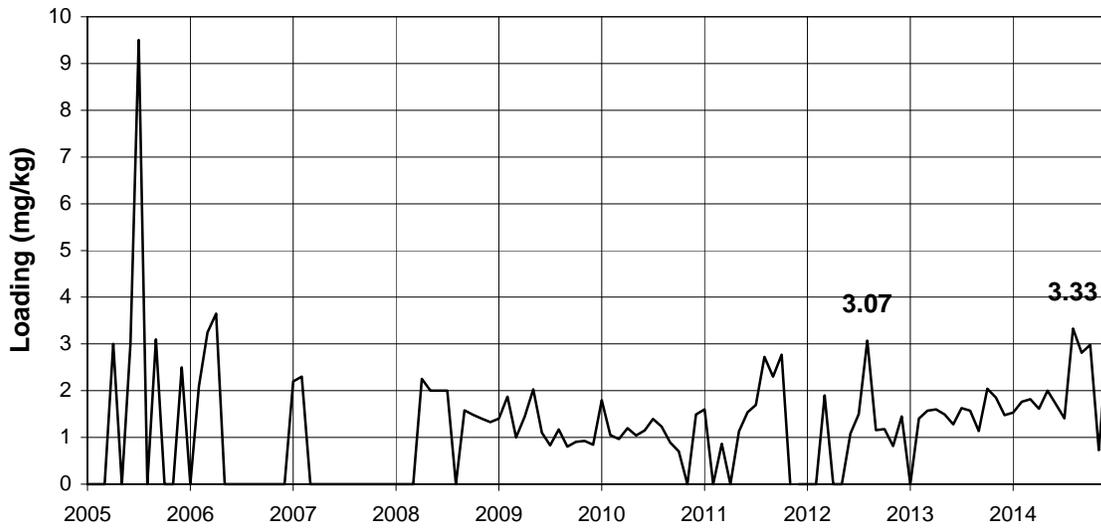
**Figure 1- 2**  
**WRF Biosolids-Arsenic**



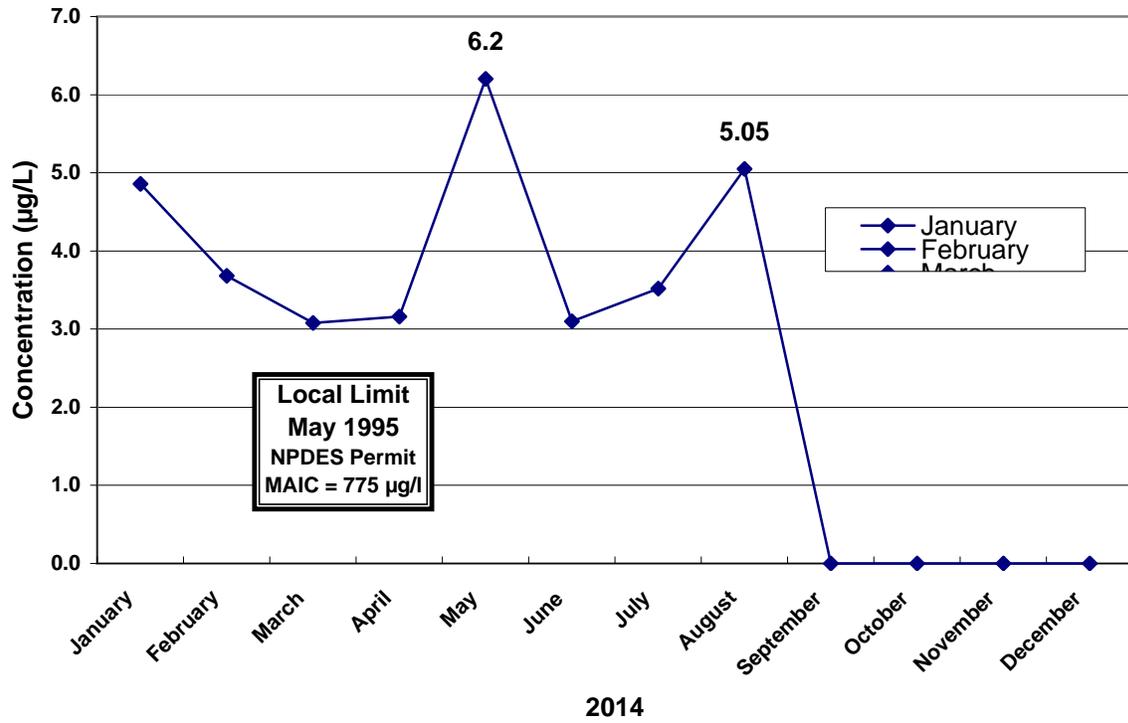
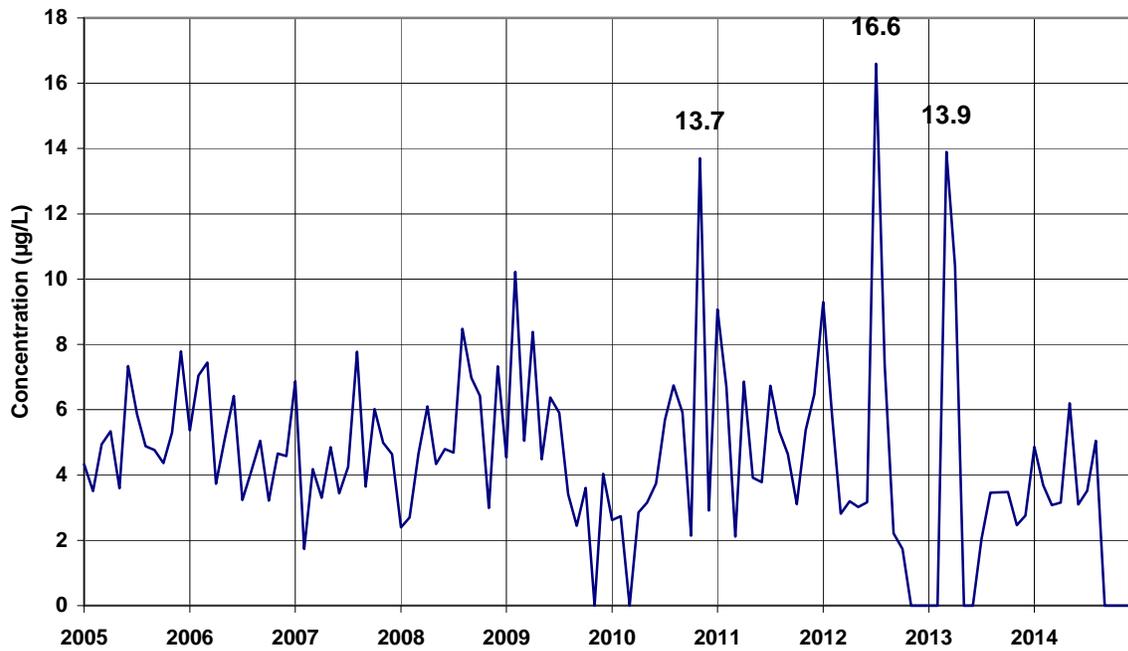
**Figure 1-3**  
WRF Influent-Cadmium



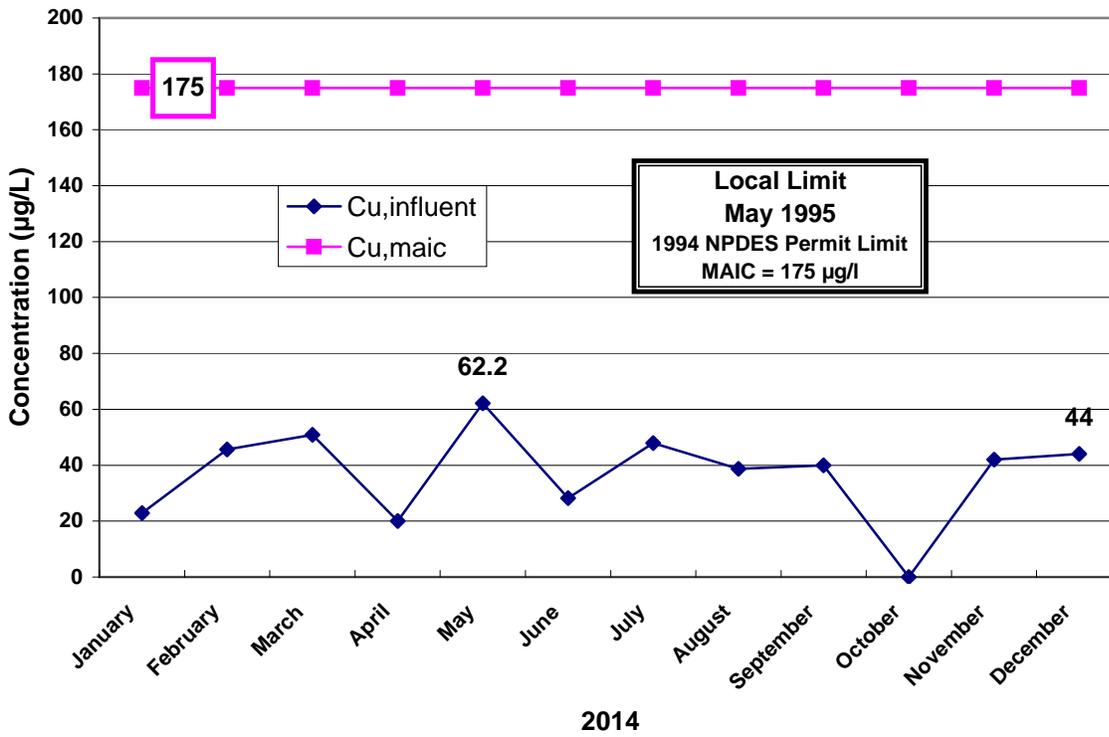
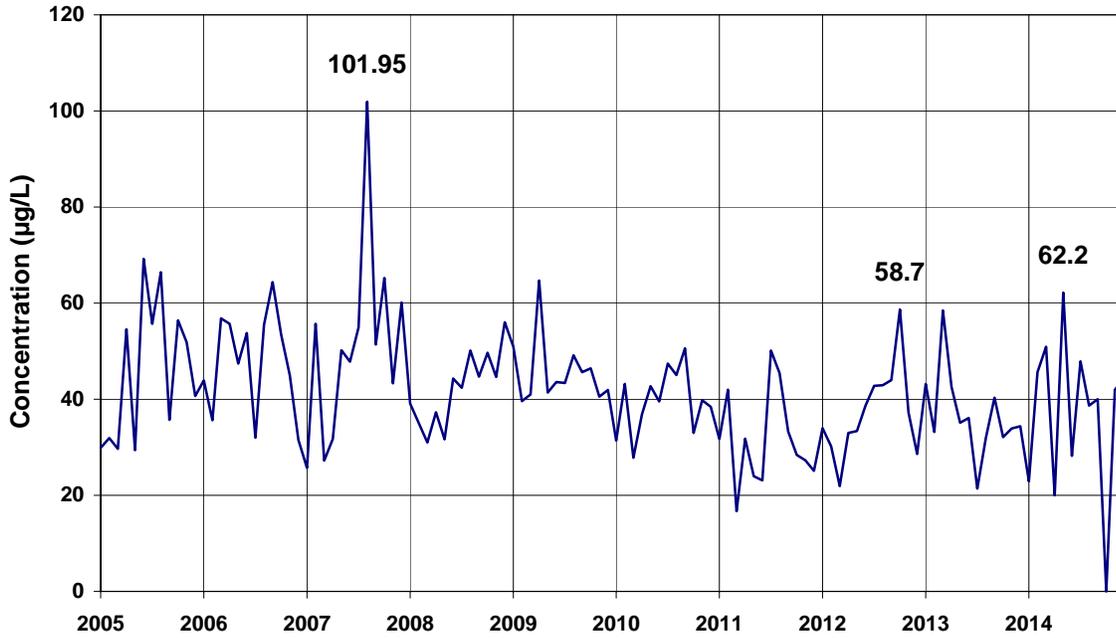
**Figure 1- 4**  
**WRF Biosolids-Cadmium**



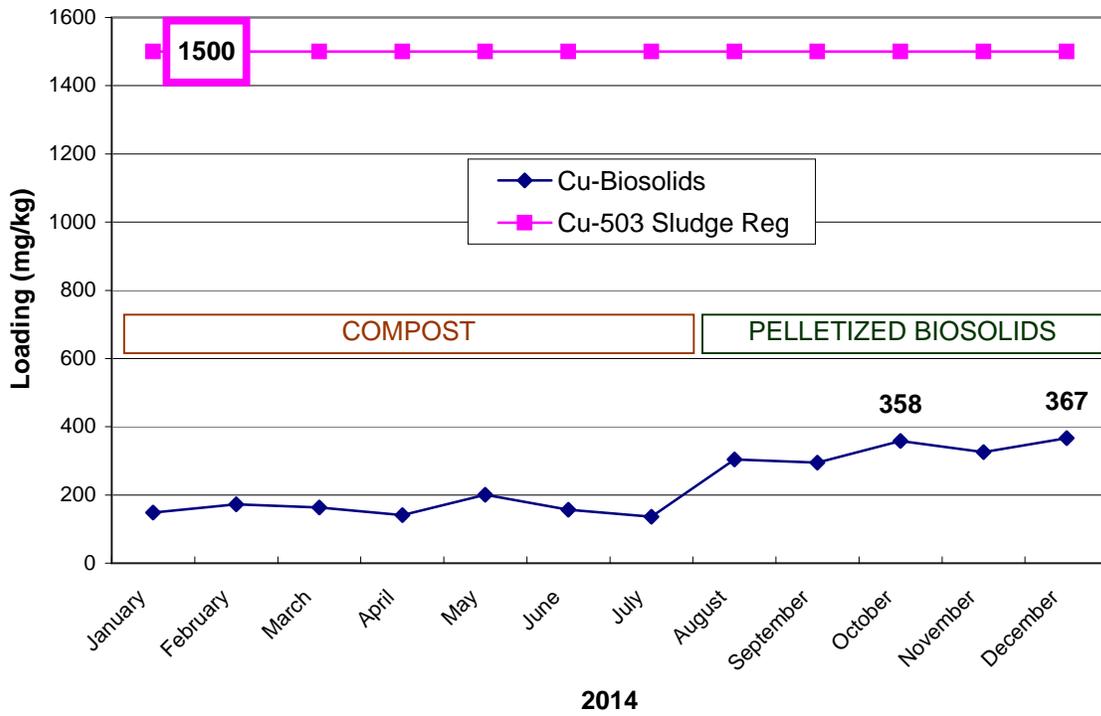
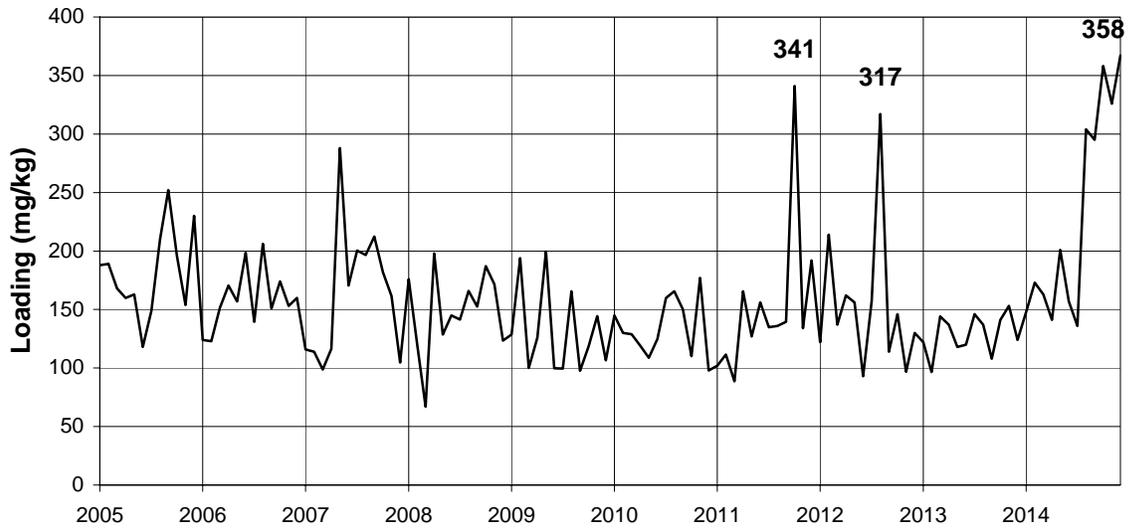
**Figure 1-5**  
**WRF Influent-Chromium**



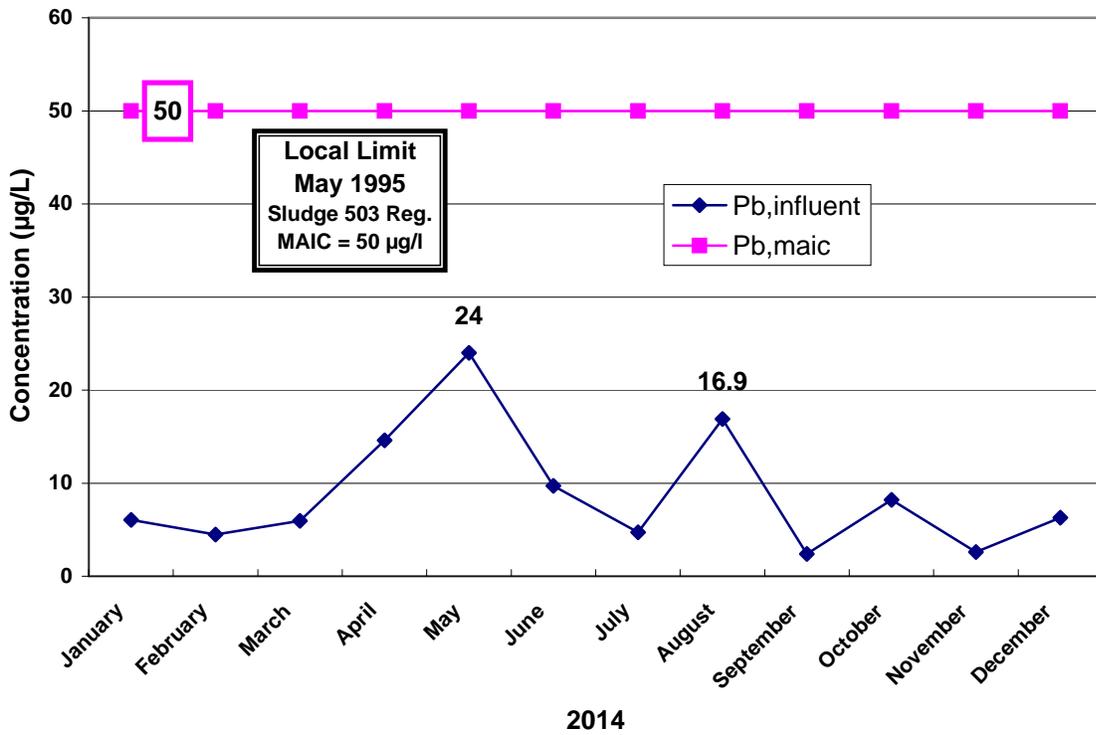
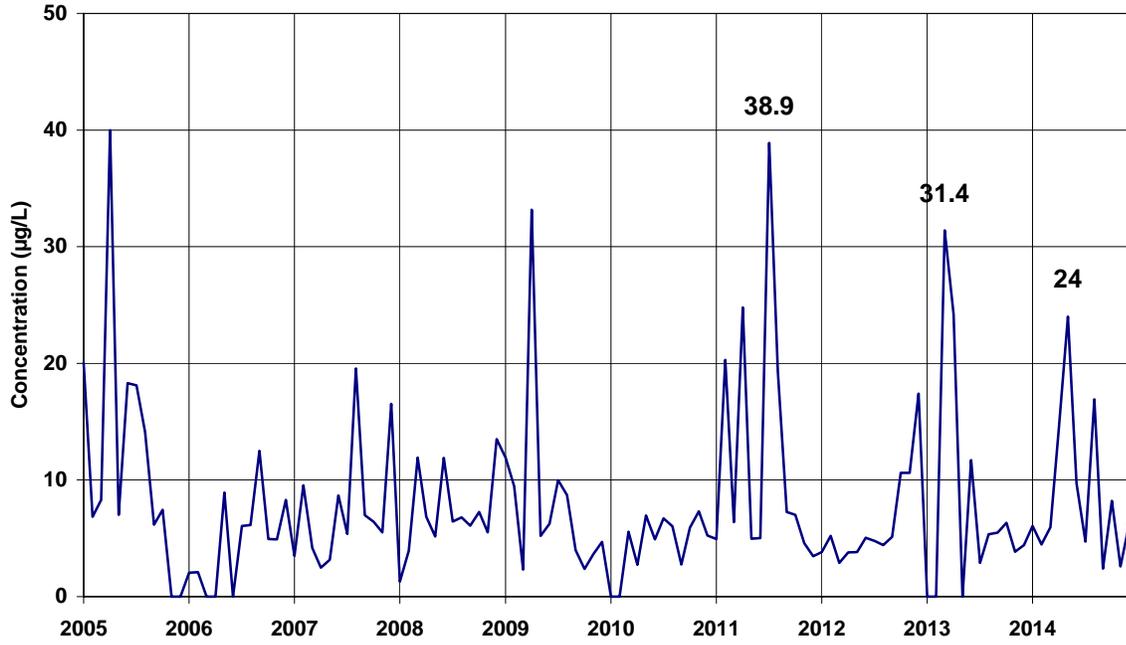
**Figure 1- 6**  
**WRF Influent-Copper**



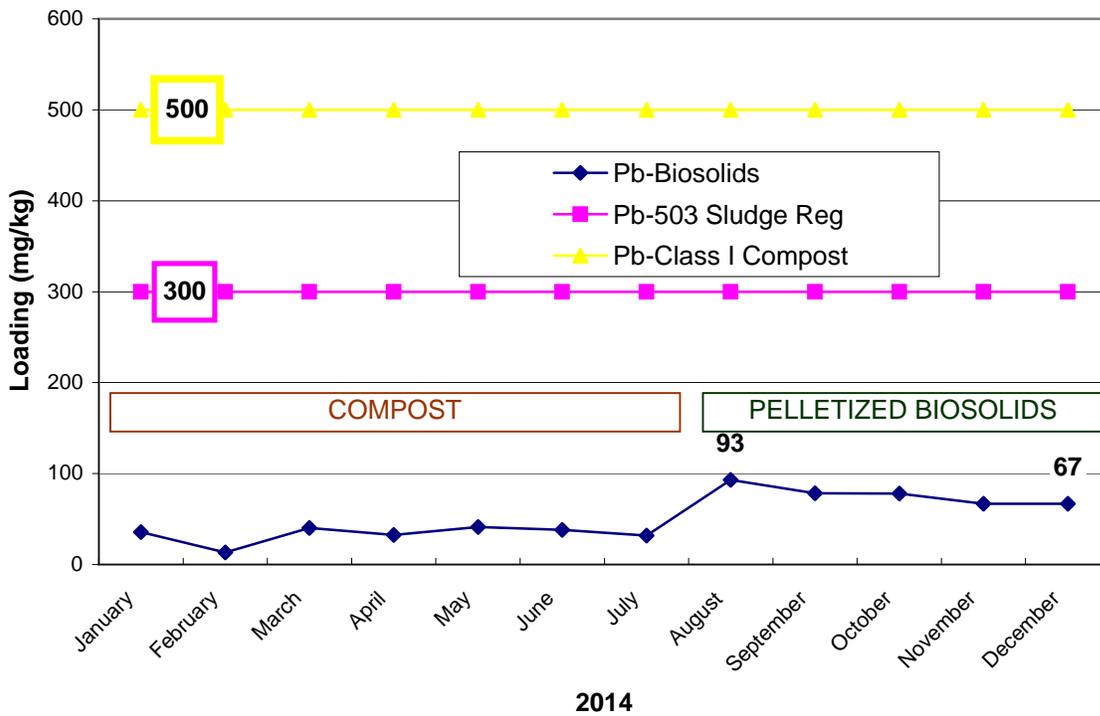
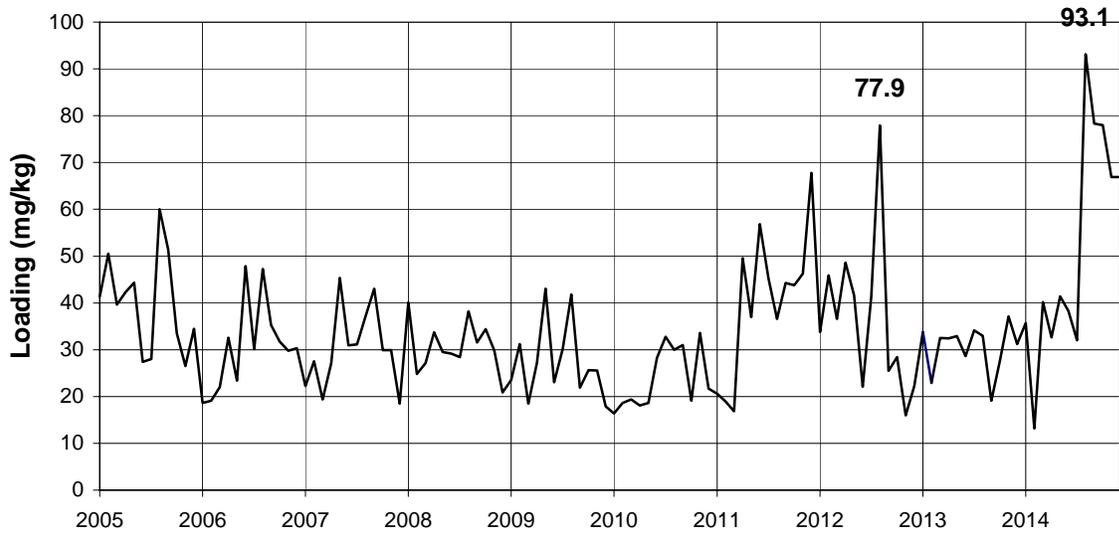
**Figure 1-7**  
**WRF Biosolids-Copper**



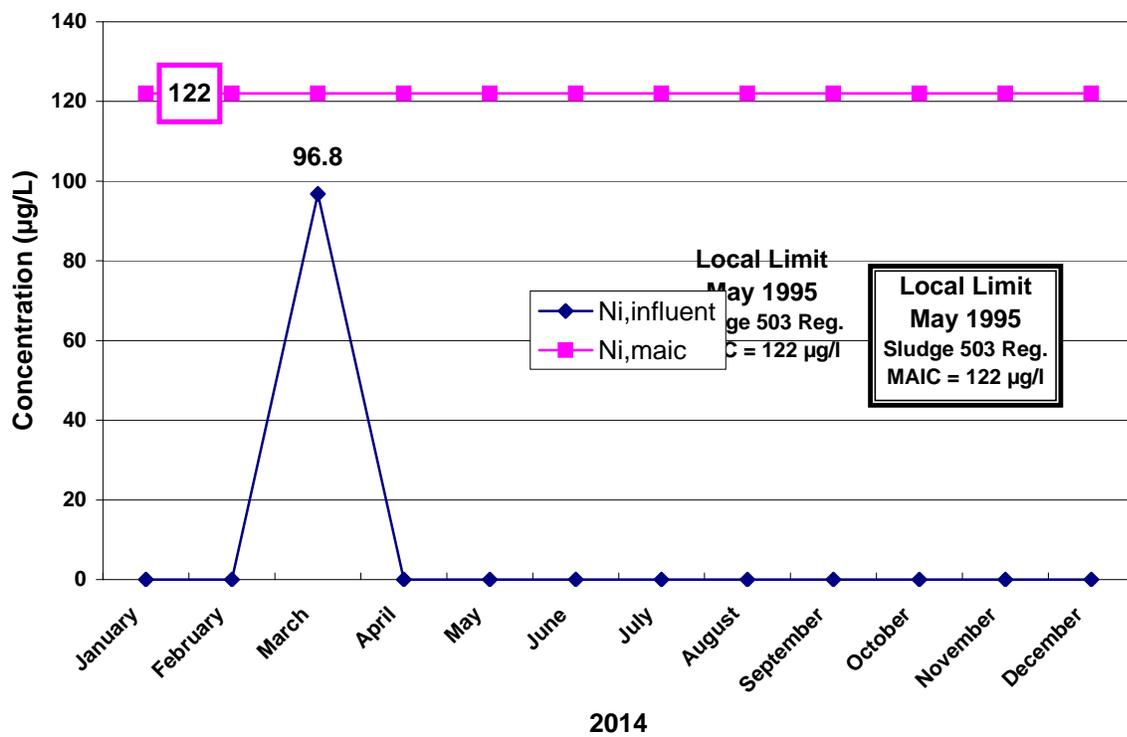
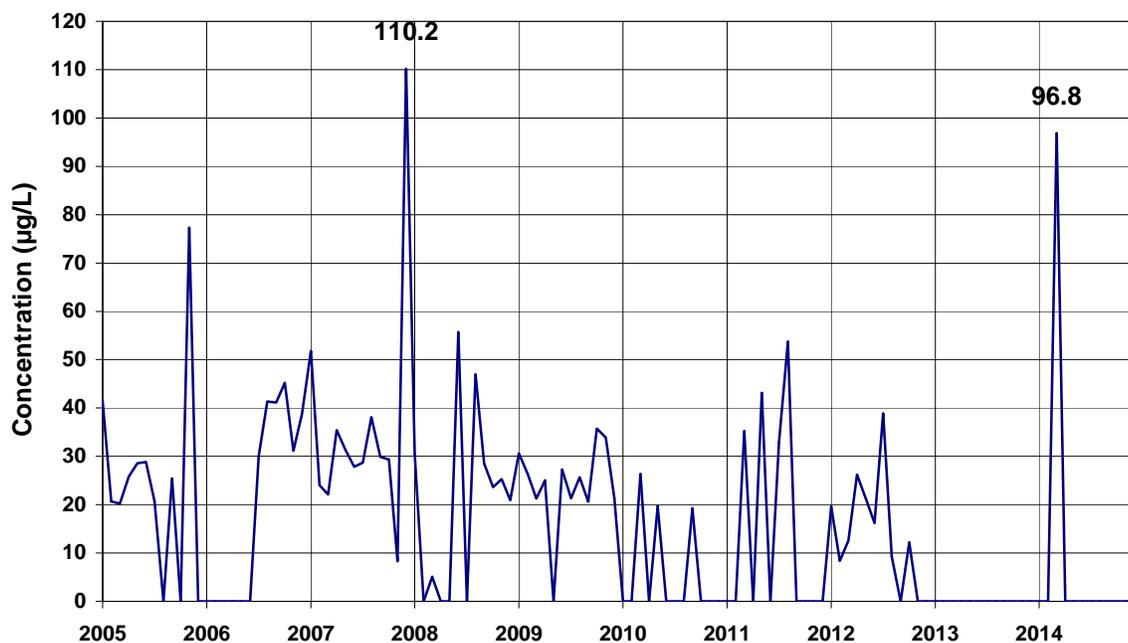
**Figure 1-8**  
**WRF Influent-Lead**



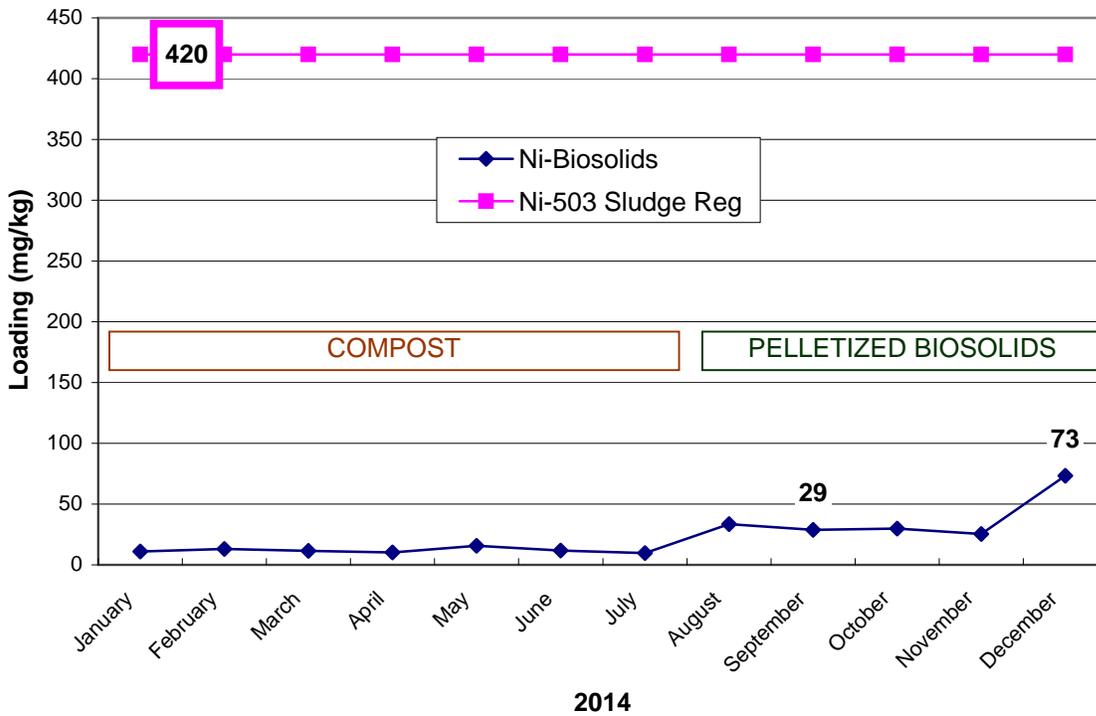
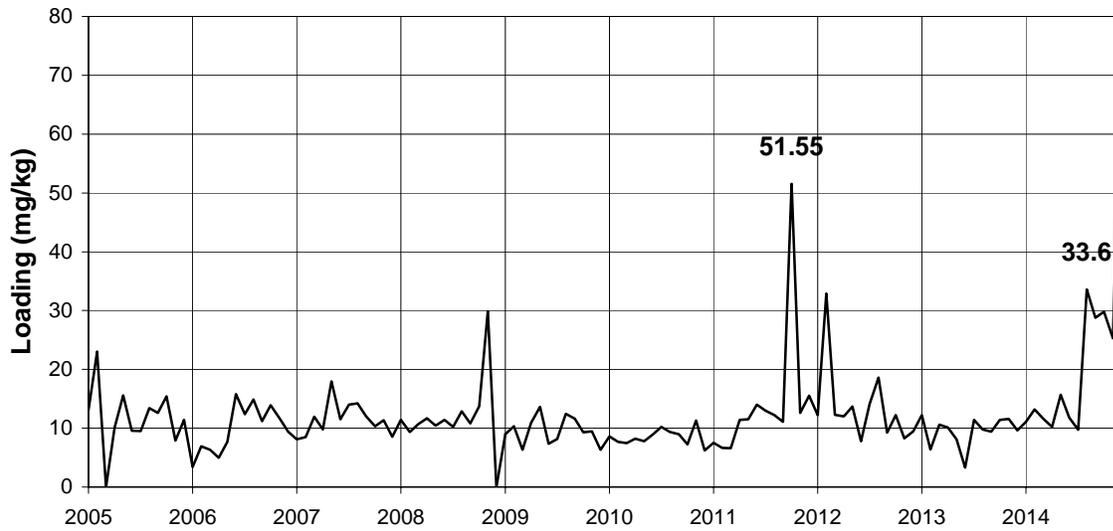
**Figure 1-9**  
**WRF Biosolids-Lead**



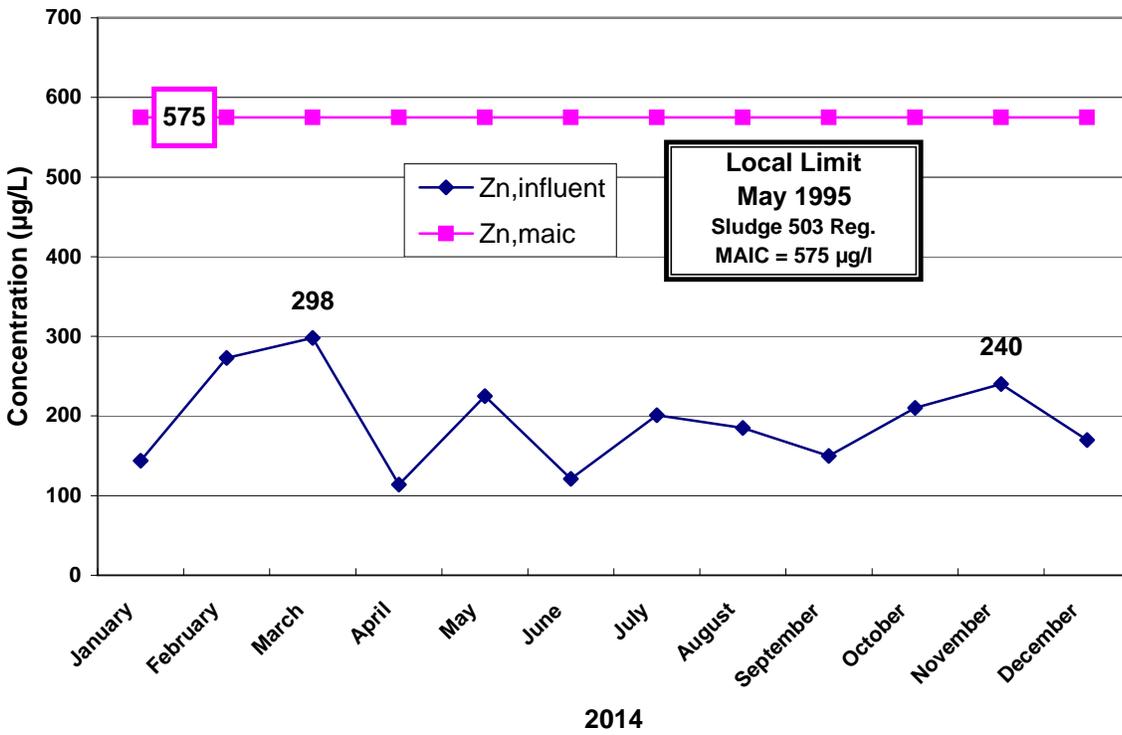
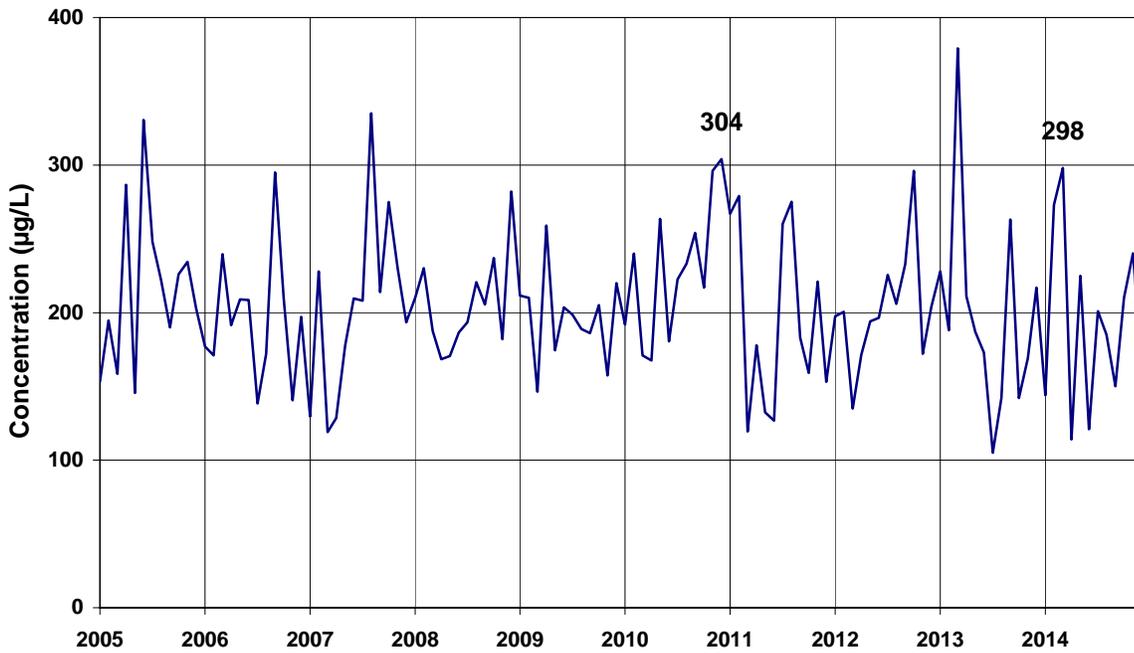
**Figure 1- 10**  
**WRF Influent - Nickel**



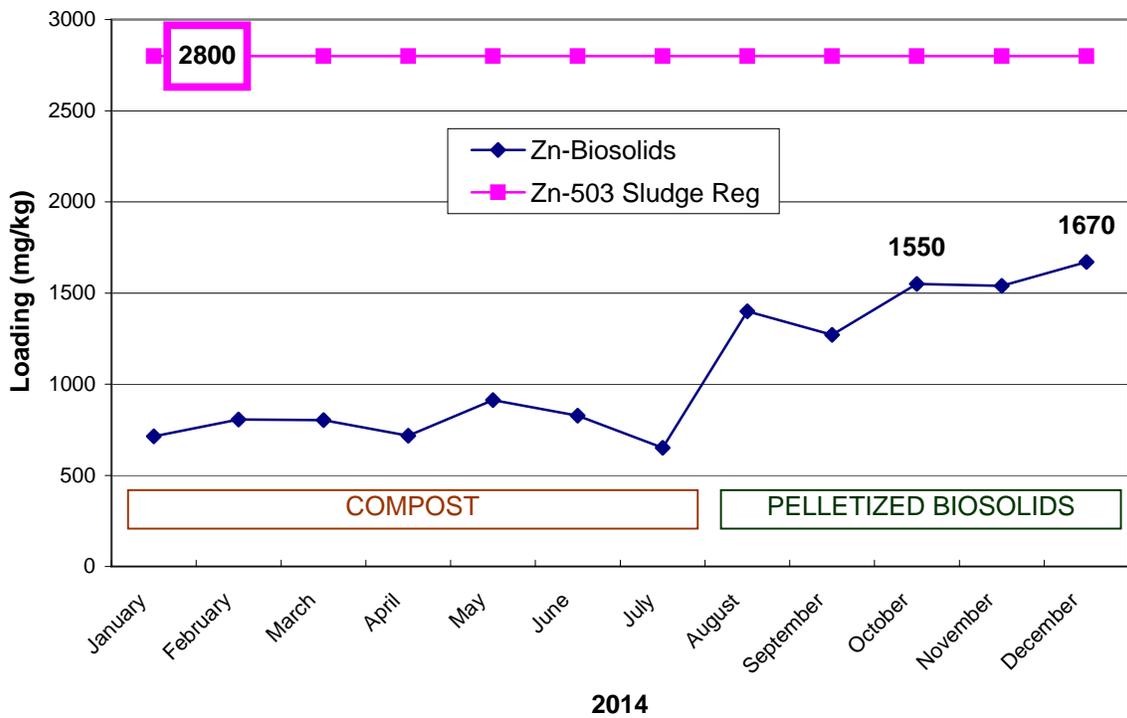
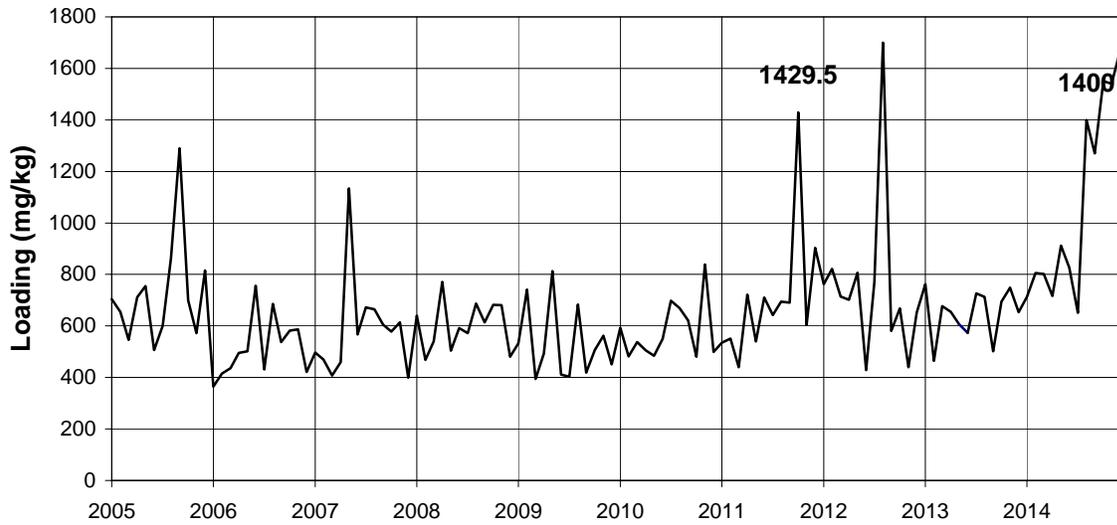
**Figure 1-11**  
**WRF Biosolids-Nickel**



**Figure 1- 12**  
**WRF Influent - Zinc**

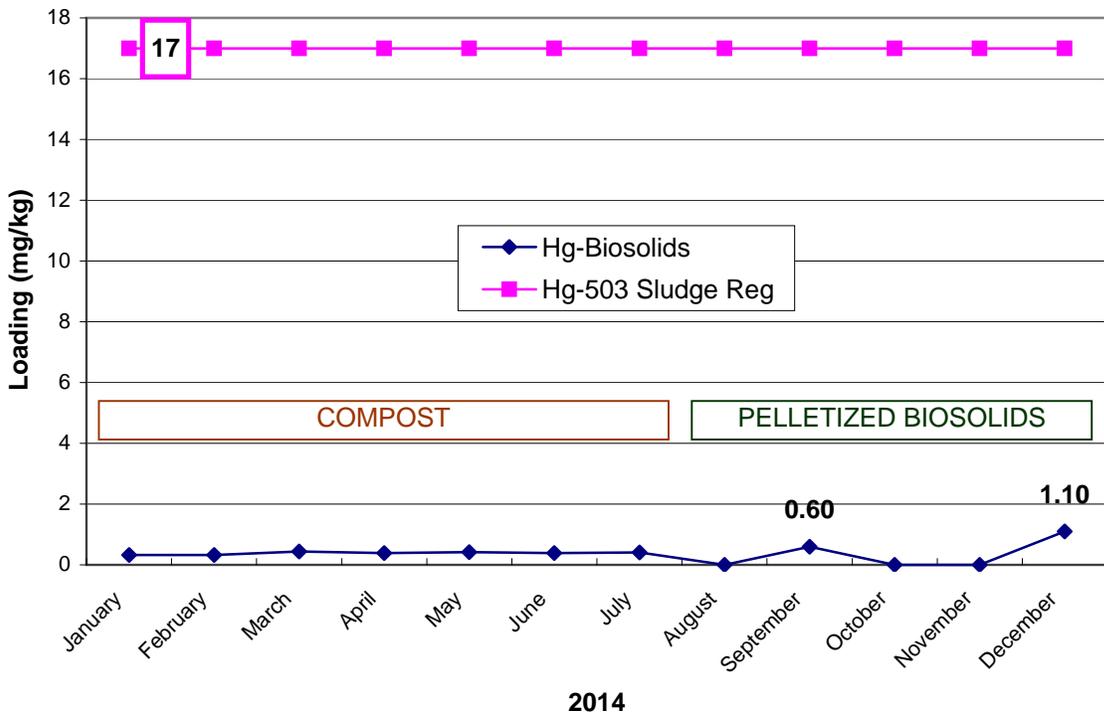
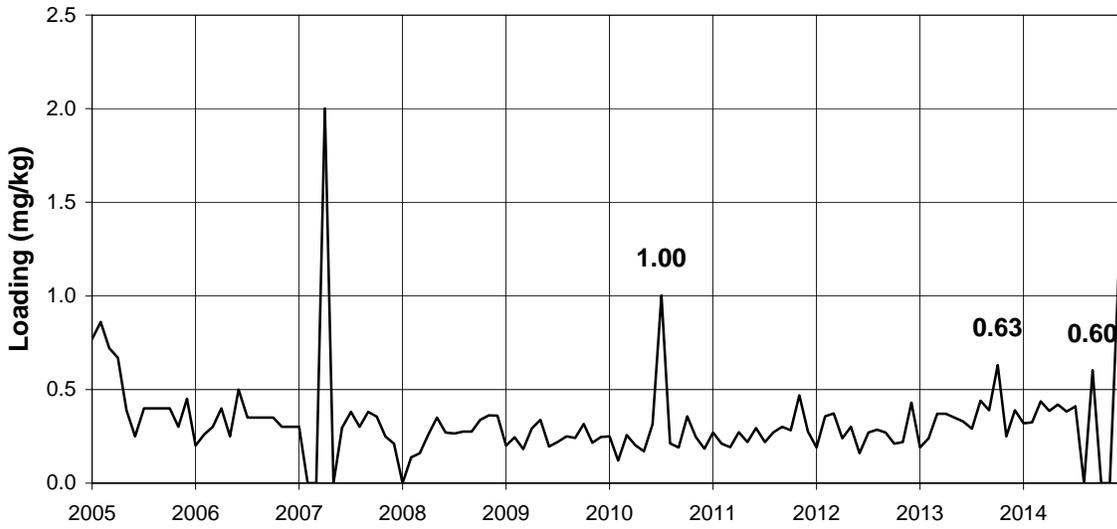


**Figure 1-13**  
**WRF Biosolids-Zinc**

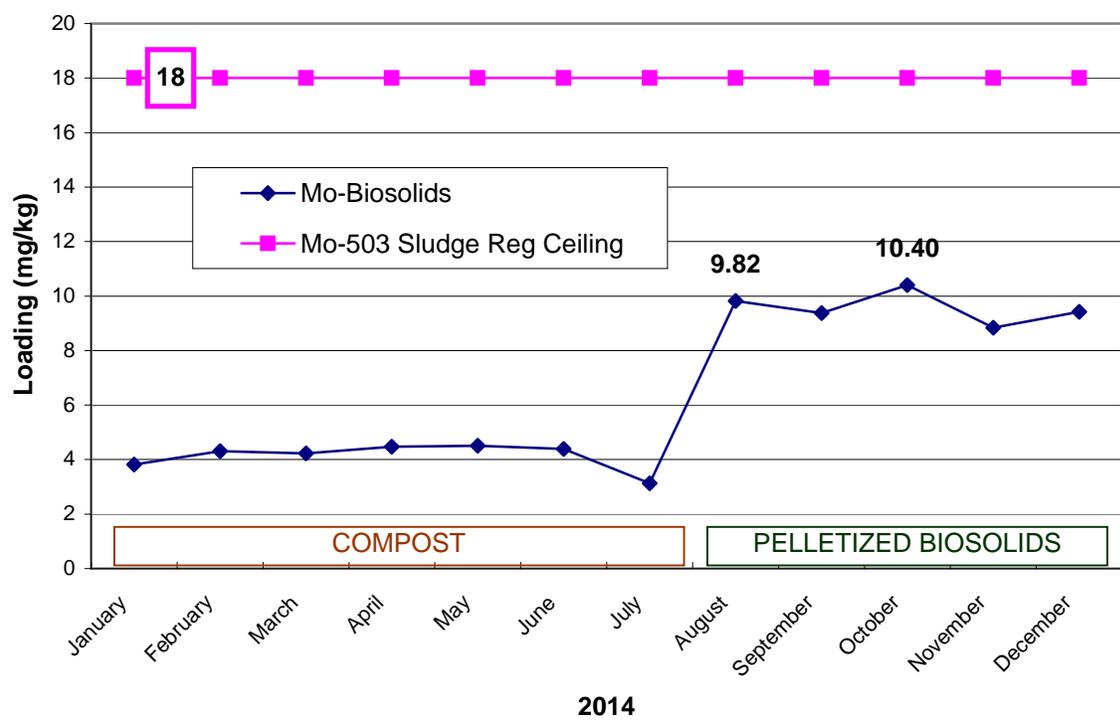
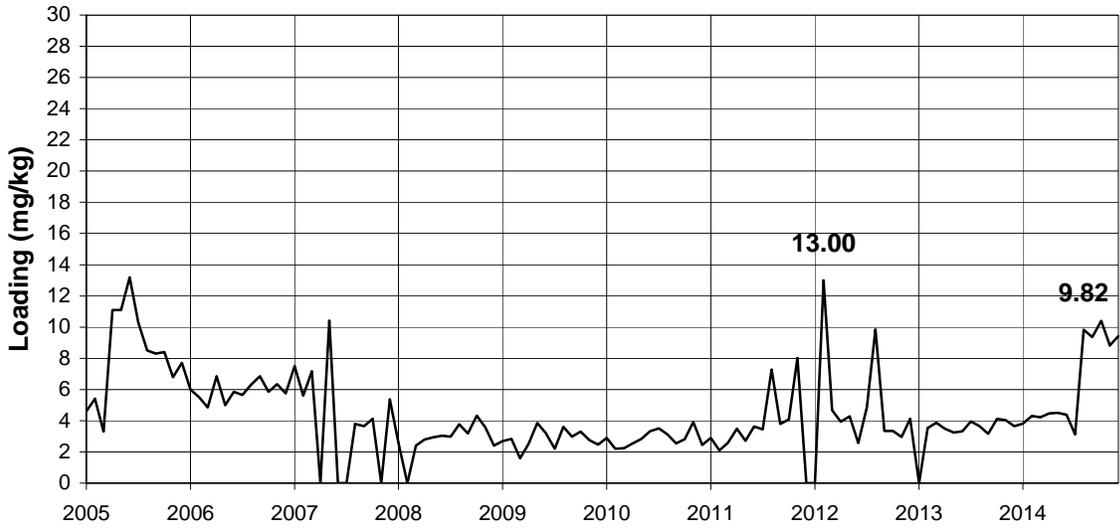




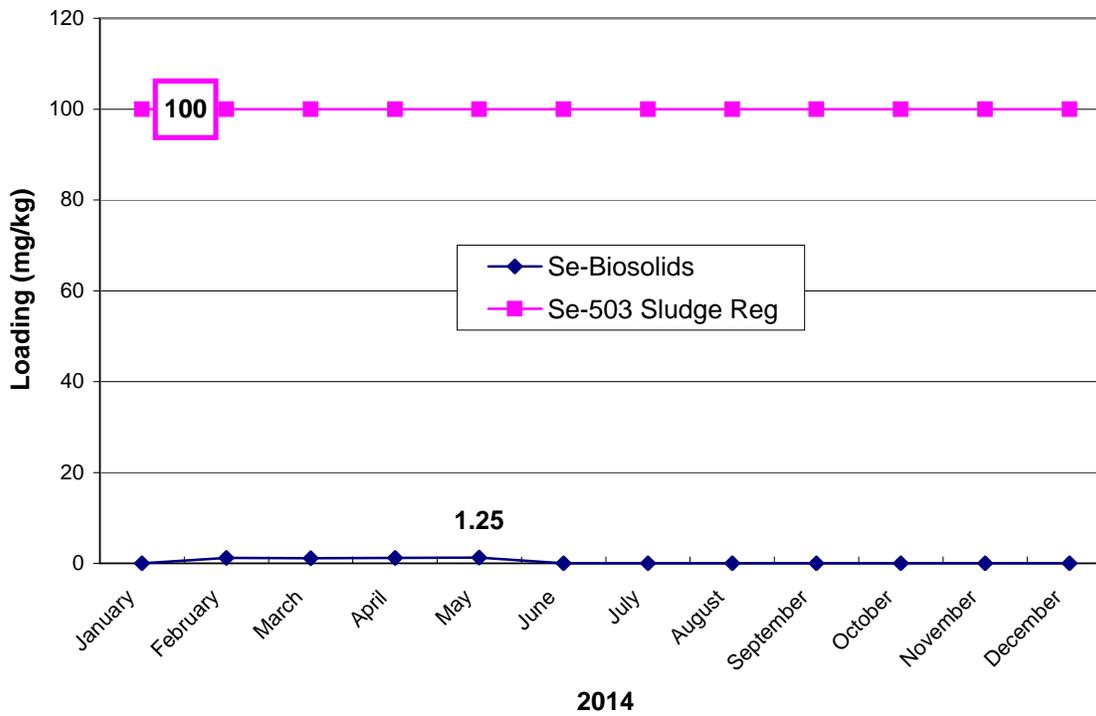
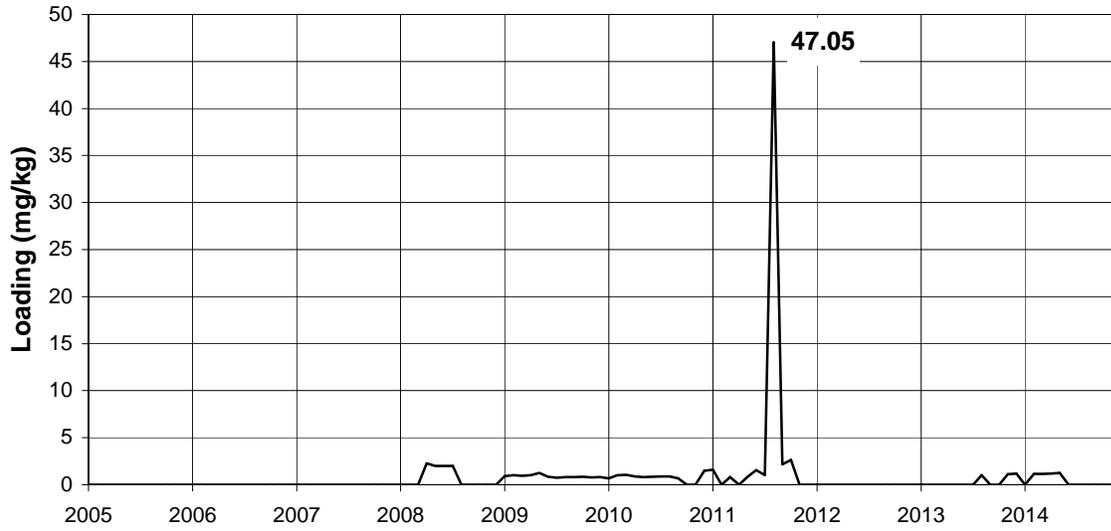
**Figure 1- 15**  
**WRF Biosolids-Mercury**



**Figure 1-16**  
**WRF Biosolids-Molybdenum**



**Figure 1- 17**  
**WRF Biosolids-Selenium**



**Figure 1-18**  
**Organizational Chart & Responsibilities**  
**December 31, 2014**

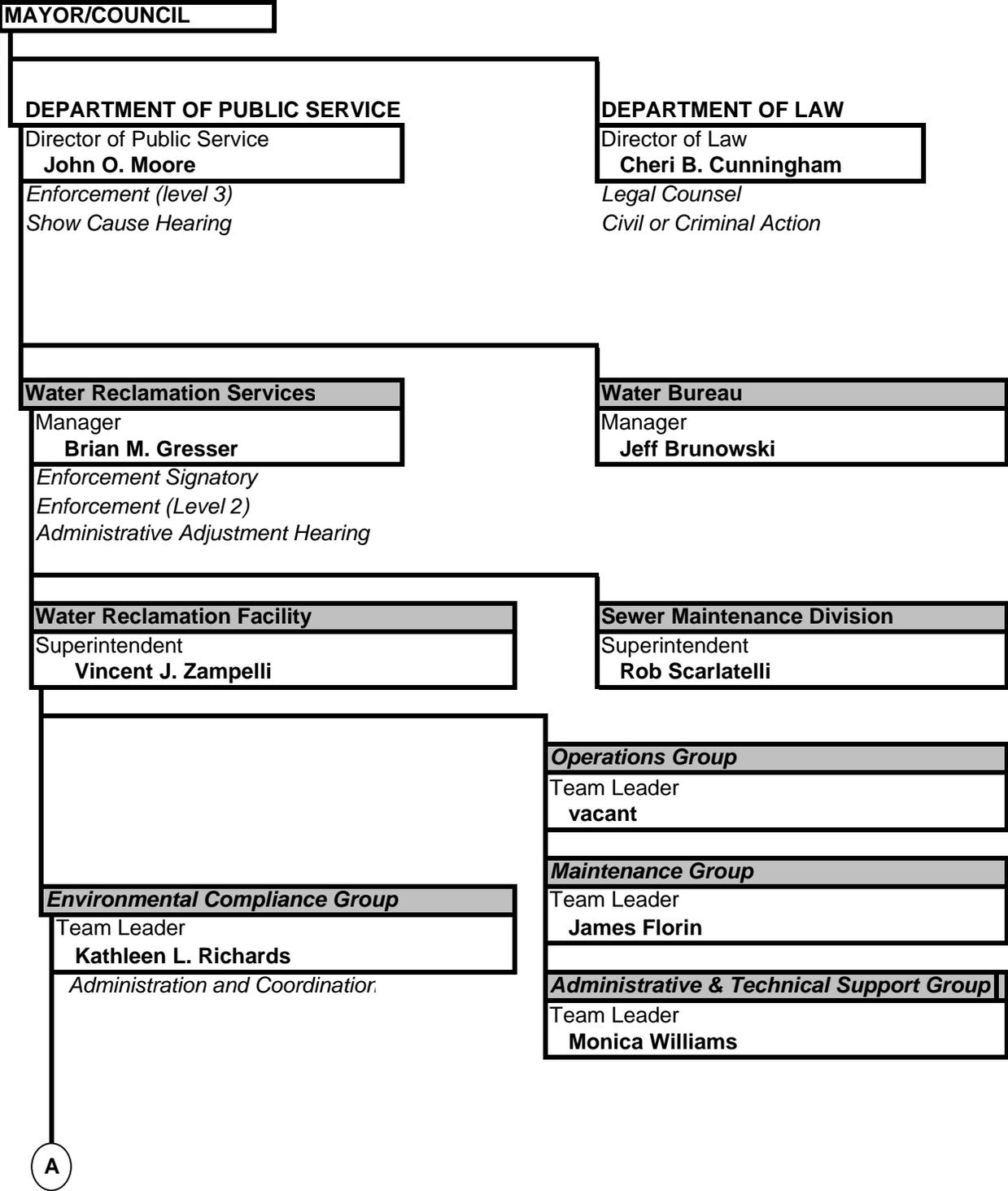
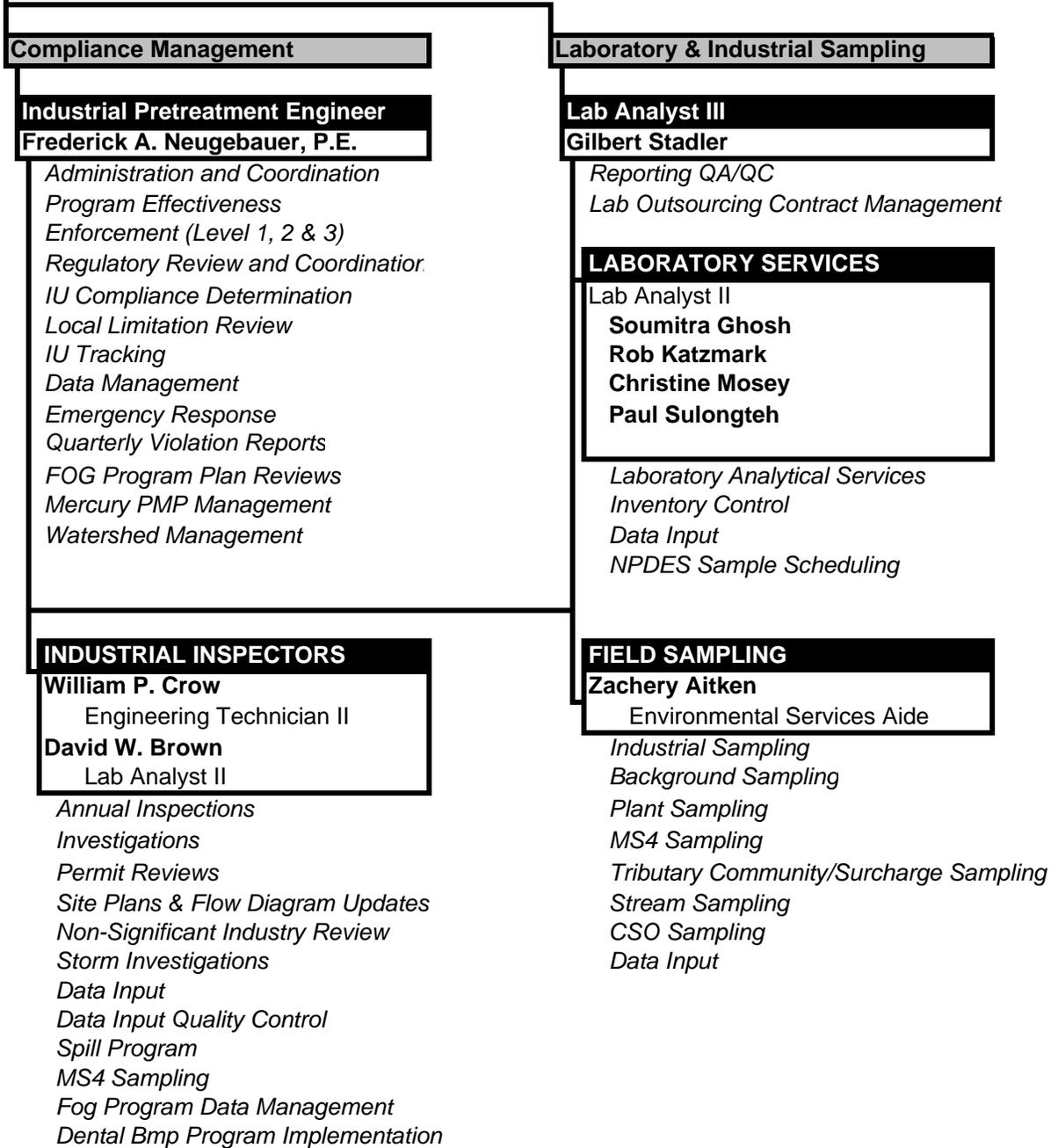


Figure 1-17 (continued)

A



## SECTION 2 PRETREATMENT PERFORMANCE

### 2.1 Performance Summary

The Industrial Pretreatment performance summary is provided in the format of EPA Form AR-2. The form is found following the text portion of this Report. The form provides general information, sampling totals, “significant non-compliance” assessments and enforcement activities.

The following definitions from the Code apply to EPA Form AR-2:

**Significant Industrial User (SIU)** - A person, governmental entity or discharger who discharges to the POTW liquid, solid or gaseous waste resulting from the processes employed in industrial or manufacturing activities, or from the development, recovery or processing of any natural resource. SIU includes the following:

- 1) All dischargers subject to categorical pretreatment standards,
- 2) Any other discharger that:
  - a) Discharges an average of twenty-five thousand gallons per day or more of process wastewaters to the POTW;
  - b) Contributes a process wastestream which makes up five percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or
  - c) Has a reasonable potential, in the opinion of the Service Director, to adversely affect the POTW's operation or for violating any pretreatment standard or requirement.

**Significant Noncompliance (SNC)** - An industrial user is in significant noncompliance if its violations meet one or more of the following criteria;

- Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit, the average limit, or the instantaneous limit for the same pollutant parameter;
- Technical review criteria (TRC) violations, defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit, the instantaneous limit, or the average limit multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH);
- Any other violation of a pretreatment effluent limit (daily maximum, longer term average, instantaneous limit or narrative standard) that the Service Director determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);
- Any discharge of a pollutant that has caused imminent endangerment of human health, welfare or to the environment or has resulted in the POTW's exercise of emergency authority to halt or prevent such a discharge;

- Failure to meet, within ninety days after the schedule date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
- Failure to provide, within forty-five days after the due date, required reports such as baseline monitoring reports, ninety-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- Failure to accurately report noncompliance;
- Any other violation or group of violations, which may include a violation of best management practices, which the Service Director determines will or has adversely affected the operation or implementation of the city's pretreatment program.

For the purpose of the chronic and TRC discharge limit violations the ending date of each quarter is used to determine the SIU's status for the previous six months.

The Industrial User violations are reported to Ohio EPA on a quarterly basis in accordance with the City's NPDES Permit. The Quarterly Violation Report (QVR) includes information on the violation type, date, chronology of enforcement events and comments (current status). The following Industrial Users were in significant noncompliance (SNC) during 2014.

<b>Table 2-1</b> Industrial Users found in SNC during 2014			
<b>1st Quarter</b>	<b>2nd Quarter</b>	<b>3rd Quarter</b>	<b>4th Quarter</b>
H&M Metal Processing Co.	<i>(none)</i>	<i>(none)</i>	Emerald Performance Materials, LLC
			OMNOVA Solutions Inc. - Mogadore Plant

Details of all violations of pretreatment standards are reported on the QVRs.

**Form AR-2** is the Pretreatment Performance Summary for the City of Akron Pretreatment Program. The totals shown are for the industries within the Akron program. Those industries discharging to the Akron POTW as part of the Summit County program are reported by the Summit County Environmental Services.

**Form MOD-1** is the Significant Industrial Users List. This list identifies the criteria for designation as SIU. It is also used to identify changes to the industrial user inventory.

During 2014 no industry was de-listed:

During 2014 one permitted industry was added:

Auris Noble, a non-discharging recycler of nonferrous metals, was issued Permit MI-106 effective October 1, 2014. This industry will be inspected annually and is also required to report semi-annually to confirm non-discharge status.

**Form AR-3** contains Industrial User Inventory and Monitoring data. As of December 31, 2014, the City had 53 Significant Industrial Users (SIUs) of which 26 were classified as categorical industrial user's (CIUs) including eight non-discharging industries and one that does not discharge categorically regulated wastewater but does have a discharge that is regulated by local limits.

The City conducted inspections at all of the industries as tabulated on EPA Form AR-3.

The City sampled 43 industries with effective control documents at least once during 2014. The ten (10) industries with effective control documents not sampled at least once during 2014 are as follows:

- a) The Plate-All Metal Company (MA-006) is regulated as a non-discharging electro plating company (40 CFR 413). This SIU filed a "certification of non discharge" twice during the year. In addition this SIU was inspected to verify non-discharging status.
- b) Universal Plating, Inc. (MA-007) is regulated as a non-discharging electro plating company (40 CFR 413). This SIU filed a "certification of non discharge" twice during the year. In addition this SIU was inspected to verify non-discharging status.
- c) Heritage Industrial Finishing – Kelly Avenue Facility, (MA-018) is regulated as a metal finishing categorical user. However, this facility was not in use during the entire year and did not discharge any industrial wastewater. For this reason the facility was not sampled during the year. This facility was inspected during the year and the non-discharge claim was verified.
- d) Goodyear Tire and Rubber Company, Plant 5 – R&D (SI-011) discharges 550 gpd and self-monitors for pH only.
- e) Tri-County Hard Chrome (MI-077) is regulated as a non-discharging electro plating company (40 CFR 413). This SIU filed a "certification of non discharge" twice during the year. In addition this SIU was inspected to verify non-discharging status.
- f) GRIMCO, INC (MI-086), is regulated as an aluminum coil coating operation (40 CFR 465). Although permitted to discharge, the facility has been operating as a non-discharging operation since 2010. Their wastewater is batch collected and treated by a centralized waste treatment facility. This SIU did not discharge in 2014 and filed Self-Monitoring Reports indicating "No Discharge" twice during the year. In addition, this SIU was inspected to verify that no discharge of categorically regulated wastewater was discharged during the year.
- g) Integrated Roll Services (MI-087) is regulated as a non-discharging electro plating company (40 CFR 413). This SIU filed a "certification of non discharge" twice during the year. In addition this SIU was inspected to verify non-discharging status.
- h) Weaver Fabricating and Finishing (MI-102) is regulated as a non-discharging metal finishing industry (40 CFR 433). This SIU filed a "certification of non discharge" twice during the year. In addition this SIU was inspected to verify non-discharging status.
- i) King Model / King Castings (MI-103) is regulated as a non-discharging Metal Molding and Casting Categorical User (40 CFR 464). This SIU filed a "certification of non discharge" twice during the year. In addition this SIU was inspected to verify non-discharging status.

- j) Auris Noble (MI-106) has been regulated as a non-discharging recycler of nonferrous metals since October 1, 2014. This SIU filed a “certification of non discharge” for the second half of 2014. In addition inspections conducted in support of the development of this permit confirmed their non-discharging status.

**Table 2-2**  
Fines and Recoverable Costs Assessed and Collected during the Year 2014

Industry	Permit ID	Assessed	Collected
Emerald Performance Materials, LLC	MA-003	200	200
OMNOVA Solutions Inc. - Akron Plant	MA-015	2,600	2,600
Meggitt Aircraft Braking Systems	MA-016	200	200
H&M Metal Processing Co.	MA-017	6,900	6,900
Coltène-Whaledent	MA-020	1,300	1,300
Hayes Lemmerz International – Akron Operation	SI-010	500	500
Totals	6 IUs	\$ 11,700	\$ 11,700

**2.2 Industrial Users History of Noncompliance**

**2.2.1 Industrial Users**

The following is a brief description of each Industrial User, which for the reporting year was found in Significant Noncompliance (SNC), as summarized in Table 2-2 or assessed a fine for a violation that occurred during the year. As of the end of 2014 there were two companies in a state of SNC. Detailed information concerning the Industrial Users can be found on Form AR-4 in the “Ohio EPA Forms” section of this report.

To comply with federal, state and local code requirements; the City is providing a copy of the public notice of Industrial Users that were in Significant Noncompliance (SNC) during the period of January 1, 2014 to December 31, 2014.

A copy of the Public Notice as it appeared in the Akron Beacon Journal, on Sunday, March 29, 2015 is included at the end of this section as Figure 2-1.

**MA-003 Emerald Performance Materials, LLC**

This SIU was found in SNC for the fourth quarter of 2014 for TRC violations of monthly loading average limitations on Total Cyanide. A fouled and out of calibration pH probe resulted in the failure to maintain pH levels required for cyanide destruction. The probe was cleaned and calibrated to abate the violation. In addition the monthly preventive maintenance and calibration program was updated to include pH probe cleaning and calibration and the probe was moved to a more accessible location. This SIU was assessed and paid fines totaling \$200. Subsequent self-monitoring demonstrated a return to compliance with discharge limitations.

**MA-008 OMNOVA Solutions Inc. - Mogadore Plant**

This SIU was found in SNC for the fourth quarter of 2014 for TRC violations of monthly loading average limitations on methylene chloride. Associated enforcement actions were ongoing during the first quarter of 2015.

**MA-015            OMNOVA Solutions Inc. - Akron Plant**

This SIU was assessed and paid fines totaling \$2,600 for pH violations, spill plan violations, violations of requirements to notify the City of violations within 24 hours and for failing to make provisions to prevent permit violations as a result of power outages. The cause of the pH violations was the failure to close a manual pretreatment system bypass valve that had been intentionally opened as a precaution during a planned power outage associated with maintenance activities at the facility. Through the associated investigation it was discovered that this SIU is voluntarily participating in a rolling blackout program with their electricity provider in exchange for economic considerations. Since loss of power would result in the disabling of the pump that routed the discharge through the pretreatment system, the standard operating procedure at the facility for averting wastewater back-ups into the facility as a result of any power outages, was to manually bypass the pretreatment system. This was in violation of the permit, which holds the permittee “responsible for maintaining adequate safeguards to prevent the discharge of untreated or inadequately treated wastewater during electrical power failures”. This SIU obtained and installed a gasoline powered trash pump and associated suction and discharge hoses capable of keeping the pretreatment system operational in the event of planned or unplanned power outages at the plant.

**MA-016            Meggitt Aircraft Braking Systems**

This SIU was assessed and paid fines totaling \$200 for recurring violations of maximum discharge limitation of Total Chromium and Total Cyanide. These violations were caused by insufficient draining of plated parts over the plating tank prior to rinsing in overflowing rinse tank. To address the cause of this violation this SIU installed a dead rinse tank just prior to the overflowing rinse tank and retrained workers on manual plating procedures. Subsequent self monitoring demonstrated a return to compliance with discharge limitations.

**MA-017            H&M Metal Processing Co**

This SIU was found in SNC in the first quarter for TRC violations of daily maximum limitations for Total Chromium and also for chronic and TRC violations of monthly average limitations for Total Chromium.

This SIU was assessed and paid fines totaling \$6,900. This includes a fine of \$6,400 assessed on May 22, 2014 for recurring Total Chromium and Total Cyanide violations incurred since the third quarter of 2013 and a fine of \$500 assessed on August 21, 2014 for another recurring Total Cyanide violation. A deficient pretreatment system is the cause for all violations of record. As of the end of 2014 the SIU was working through final details for the replacement of the pretreatment equipment. Until the new equipment is installed this SIU is taking extraordinary efforts with the existing pretreatment system to assure compliance with discharge limitations.

**MA-020            Coltène-Whaledent**

This SIU was assessed and paid fines totaling \$1,300. This includes a fine of \$800 that was assessed on August 21, 2014 for recurring nickel violations incurred during the 2<sup>nd</sup> quarter and for failure to comply with notification and reporting requirements with respect to the violations. An additional fine of \$500 was assessed on September 25, 2014 for another recurring nickel violation incurred during the 3<sup>rd</sup> quarter. The cause of the nickel violations was interference with pretreatment caused by EDTA from titration waste unadvisedly disposed of through the pretreatment system. The SIU ceased this practice to prevent recurrence. In addition, procedures were updated to assure appropriate and timely notifications and subsequent reporting of violations.

**SI-010 Hayes Lemmerz International, Inc. – Akron Operations**

This SIU was assessed and paid fines totaling \$500 in 2014 for self-monitoring and reporting violations incurred during 2013. There were six findings of deficient reporting, which includes five instances of failure to include the laboratory report and one instance where analytical results were not transcribed to the self-monitoring report form. There was also one finding of “Failure to Monitor Correctly” for not testing for Cadmium, Chromium, Copper, Lead and Nickel during the second half of 2013. Changeover of personnel responsible for the duties of the Industrial Pretreatment Program at this facility without adequate procedures to assure thorough communication of responsibilities was the cause of these violations. In May of 2014 a meeting was held at WRF with the Authorized Representative of the facility. At this meeting the City was presented with a report correcting the deficiencies and supplying the missing results and a check in payment of the fine, which resolved the violations.

**2.2.2 Cost of Compliance**

In addition to the summaries provided above, a tabulation of Industrial Users Cost of Compliance has been developed. During 2014, many Industrial Users were required to expend capital for additional operation and maintenance costs to achieve compliance. In addition, many IU's on their own initiative improved or expanded their pretreatment capabilities. These actions are briefly described with associated costs in Table 2-3. The Industrial Users provided the costs shown.

<b>Table 2-3</b> Industrial Users Associated Cost of Compliance			
<b>Permit No.</b>	<b>Company</b>	<b>2014 Costs</b>	<b>Description</b>
MA-016	Meggitt Aircraft Braking Systems	\$2,100	Purchase and installation of a dead rinse tank between the chrome plating tank and continuous overflow rinse tank. This tank was installed in our R&O operation to prevent exceedances in our discharge from metal finishing operations.
MA-017	H & M Metal Processing Co	\$170,000	Acquisition and installation of upgrading addition to the existing pretreatment system that should facilitate efforts to consistently comply with permit limits.

**Figure 2-1**  
**Annual Publication**  
**Significant Noncompliance (SNC)**  
 Published in the Akron Beacon Journal: Sunday, March 29, 2015  
 For Period: January 1, 2014 – December 31, 2014

**LEGAL NOTICE**  
 To comply with 40 CFR part 403.8 (f) (2) (vii) and the Code of Ordinances of the City of Akron, Ohio, Title 5 Public Works, Section 50.68, the City of Akron is hereby providing a list of Significant Industrial Users (SIUs), which during the period January 1, 2014 to December 31, 2014, were in a state of Significant Noncompliance (SNC) with applicable pretreatment standards. The referenced Code section defines SNC as chronic violations of wastewater discharge limits, Technical Review Criteria (TRC) violations of wastewater discharge limits, failure to meet compliance schedule milestones, failure to provide reports within thirty (30) days after the due date, or any other violation that has or will adversely affect the operation or implementation of the City's Industrial Pretreatment Program. The following Industrial User(s) were found in significant noncompliance during the period:  
 H&M Metal Processing Company, Emerald Performance Materials, LLC, OMNOVA Solutions Inc. - Mogadore Plant  
 The resolution of the noncompliance or the current status of each industry is as follows:  
 H&M Metal Processing Company was found in SNC in the first quarter of 2014 for TRC violations of daily maximum limitations for Total Chromium, and for chronic and TRC violations of monthly average limitations for Total Chromium. In November

monthly average limitations for Total Chromium. In November of 2013 this SIU paid a fine of \$3000 for recurring Total Chromium violations. Incurred since the second quarter of 2013. Failure to deal adequately with sedimentation is the cause of the Total Chromium violations. This company is currently in the process of replacing their pretreatment equipment with completion expected in the second quarter of 2015.  
 Emerald Performance Materials, LLC was found in SNC in the fourth quarter of 2014 for TRC violations of monthly average total cyanide loading limitations. The SIU reported the violation was caused by a fouled and out of calibration pH probe. This prevented maintaining a pH of 10.5 - 11.0 S.U. required for cyanide destruction. The probe was cleaned and calibrated. Cleaning and calibration of the probe was added to the monthly preventive maintenance and calibration program and the pH probe was moved to a better location to make it more conducive to calibrate. SIU also paid a fine of \$200 for the violation.  
 OMNOVA Solutions Inc. - Mogadore Plant was found in SNC in the fourth quarter of 2014 for TRC violations of monthly average methylene chloro-

Continued next column

From previous column  
 ide loading limitations. Enforcement actions were ongoing during the first quarter of 2015. The cited section of the Code of Ordinances of the City of Akron may be found on the Internet at <https://www.municode.com/library/oh/akron>  
 The Industrial Pretreatment Program of the Akron Water Reclamation Facility, 2460 Akron Peninsula Road, Akron, Ohio 44313 prepared this notice for publishing by May 15, 2015.

## **SECTION 3 INDUSTRIAL USER INVENTORY AND MONITORING PROGRAM**

The Industrial User (IU) Inventory and Monitoring Section includes Ohio EPA Forms AR-3, AR-4, AR-5 and AR-6. Several of these forms utilize computer printouts and they are labeled with the EPA form number. These forms follow the text portion of this report.

### **3.1 Industrial User Inventory**

The Industrial User inventory and monitoring summaries are provided in Form AR-3. It includes the facility name and address, local classification, applicable standards and monitoring information. The monitoring information shows the number of POTW inspections and sampling events, the number of IU sampling events (self monitoring) and reporting frequency as of December 31, 2014.

#### 3.1.1 Industrial User Classifications

The Industrial Users are classified into one of four different categories: MA, SI, MI or UST. All of these categories are considered to be Significant Industrial Users (SIU). These classifications were generally defined in the Enforcement Management System as follows:

- Major Effects Industry (MA)  
Discharge greater than 50,000 gpd  
Regulated pollutants discharged in range of 1 to 5 mg/l  
Subject to Categorical Pretreatment Standards
  
- Significant Effects Industry (SI)  
Discharge greater than 25,000 gpd  
Regulated pollutants discharged in range of background concentration to 1 mg/l
  
- Minor Effects Industry (MI)  
Discharge less than 25,000 gpd
  
- Underground Storage Tank (UST)  
Ground or ground water remediation  
Not associated with an industrial facility  
Temporary dischargers

Generally, new Industrial Users will be classified according to the above definitions. It should be noted that these definitions are for general guidance only.

The applicable standards shown on AR-3 include either the Federal Categorical Standard (40 CFR 403) or local standard. A final table of 2014 discharge permit

status can be found in Appendix B. Also included in the Appendix is summary of the status of all permittees as of December 31, 2014.

A detailed listing of discharge permit status, local limitation allocation, pollutant load and flow was provided in the Local Discharge Limitations Technical Justification, May 1995. This listing was updated in December 2012 and is included in Appendix B.

The number of inspections shown includes the scheduled annual inspection in addition to all documented (by memo) field inspections. The number of sampling events includes the total number of samples taken and may include multiple sampling points. The self-monitoring requirements are prescribed in each Industrial User Permit.

Form AR-4, Industrial Pretreatment Modifications, provides a complete listing of all permitted Industrial Users as of December 31, 2014. The required additions and deletions are shown on EPA Form MOD-1. The inventory shown provides the most current information available as obtained in the 2014 annual inspections. This inventory represents only a small portion of the database maintained on each industry. The inventory provided includes the facility name, address, authorized representative, process description, local classification, flow rate, pollutants and applicable standards.

### 3.1.2 Annual Inspections

The annual inspections were conducted from April to December with additional time for finalization. Procedures used are as follows: Notifications of the inspection are emailed to the SIU's with an attached checklist of items that will be covered during the inspection. Included with the notification is a Wastewater Discharge Disclosure Declaration (WDDD) that contains the most current information relating to the SIU's operations and general information as obtained from previous annual inspections and periodical updates. Inspection dates are then scheduled with the SIU's and assigned to Pretreatment Staff.

After the inspection is conducted, changes from the existing information are entered into the database and an updated WDDD is printed. Updated site diagrams and flow diagrams are attached to the WDDD. If significant changes have occurred or if it has been an extended period of time since the last WDDD was signed, the WDDD is emailed to the IU with a letter requesting the IU's authorized representative to review for accuracy, sign the final page and return to the Industrial Pretreatment Office. The original signed copy is then filed in the Document file. The mailing of updated WDDDs to SIUs was done for the first time in 1993 and proved to be a very effective way of obtaining a current, signed, WDDD. In addition, the Environmental Compliance Team developed a WDDD Short Form. This form is generally the WDDD form sent to dischargers that are anticipated to be non-significant effects industrial users. There is enough information requested on the form to trigger the use of the Long Form or an onsite inspection.

The 2014 Annual Inspection calendars are provided in Appendix C.

A detailed description of the inspection procedures is provided in the program's Annual Inspections Procedure Guidance Manual.

### 3.1.3 TTO/TOMP

Per the Categorical Standards, the Metal Finishing and Electroplating Categories require the SIU to conduct Total Toxic Organics (TTO) sampling and complete a Toxic Organic Management Plan (TOMP). The status of each TTO/TOMP is summarized on Table 3-2, which can be found at the end of this section. The City provides the industries with a toxic organic management plan (TOMP) guidance paperwork for their use in meeting the requirement.

## 3.2 Monitoring Program

The general monitoring information is provided on Form AR-5. It includes the Industrial User classification and the inspection and sampling frequency for the POTW. Also shown are the Industrial User Self Monitoring requirements. The compliance monitoring for the City of Akron was proposed in the Enforcement Management System submitted to Ohio EPA on October 15, 1990, resubmitted in January 1991 per Ohio EPA comments, and approved by Ohio EPA on May 21, 1991. The general information is used as guidance for incorporation in the specific permits.

## 3.3 Local Effects

### 3.3.1 Upset, Interference and Pass Through

Form AR-6 summarizes the POTW upset, interference and pass through incidents for 2014. During 2014, there was one recorded interference event of the collection system at the Akron Water Reclamation Facility. Also, there were no violations of the regulated parameters based on pass through caused by industrial discharges during 2014.

### 3.3.2 Odors and Spills

Potential instances of upsets, interference and pass-through are closely monitored, investigated and documented. A high percentage of these potential instances generally occur from spills and odors. The following is a chronological summary of the documented odor and spill complaints reported and investigated during 2014.

### 3.3.2.1 Spills to the Sanitary Sewer

#### **March 17 - 19, 2014**

OMNOVA Solutions: Akron Plant (MA-015)

1380 Tech Way Drive

Akron, Ohio 44306

Reported by Al Sampson, SHE Manager, OMNOVA Solutions

On Saturday March 15, 2014 Goodyear Tire & Rubber Company (Goodyear) took down the steam boilers at its Plant 5 facility to perform routine maintenance. Since OMNOVA purchases steam from Goodyear to operate certain equipment at its Akron plant, the Akron management team decided to take down the plant's electrical system during the steam outage to complete repairs to a few critical electrical systems. As a result of the power loss, the wastewater lift pumps were inoperable for several hours. To prevent flooding within the plant that could be caused by the inability to pump wastewater to the city sewer, a maintenance supervisor partially opened a 12-inch manual valve at the wastewater pump station that allowed wastewater to flow by gravity to manhole 309602, in effect by-passing the plant's pH control system. When the power was restored, the valve was inadvertently left open. Production operations resumed at midnight on Monday, March 17, but the valve was not closed until 11:45 AM on Wednesday, March 19 when it was discovered to be open. During the time the valve was open and the plant was up and running (59.75 hours) low pH wastewater was discharged through the open valve on 13 separate occasions covering 225 minutes (there were no high-pH excursions). The lowest recorded pH was 3.56 S.U.

Further details concerning enforcement actions associated with this spill are discussed in Part 2.2.1 of this report.

No pass through, interference or sludge contamination was experienced at the Akron Water Reclamation Facility (WRF) facility as a result of the release.

#### **July 1, 2014 @ 2:30 PM**

OMNOVA Solutions: Akron Plant (MA-015)

1380 Tech Way Drive

Akron, Ohio 44306

Reported by Al Sampson, SHE Manager, OMNOVA Solutions

On July 1, 2014 @ 2:30 PM a production supervisor at the OMNOVA - Akron Plant determined that the plant had discharged low pH wastewater to the City of Akron sewer system. The supervisor had gone to the wastewater pump sump to clean the pH probes, (as

supervisors are required to do at least once per shift), and discovered that the water level in the sump was below the pH probes – they were not in contact with the wastewater. He adjusted the manual controller for the sump, and as soon as the water level increased to the point where the pH probes are submerged, the wastewater diversion valve automatically closed and routed all wastewater into the Effluent Tank. OMNOVA SHE Manager, Al Sampson, notified the City of Akron.

The incident investigation determined that the effluent pH was below the permit limit of 5.0 S.U. for a maximum of 4 hours 2 minutes beginning at 9:02 AM and ending at 1:04 PM. A manual level controller had been inadvertently adjusted causing the level in the pump sump to drop below the pH probes. Also, the supervisor forgot to reset the pH set point in the DCS. These two factors were determined to be the cause of the unintentional release to the City of Akron sewer system.

OMNOVA Solutions has written a comprehensive correction plan updating operator procedures to prevent future releases.

The City of Akron Industrial Pretreatment Section issued a Level One – Isolated slug discharge violation according to the “Enforcement Response Guide” and no fine was assessed.

No pass through, interference or sludge contamination was experienced at the Akron Water Reclamation Facility (WRF) facility as a result of the release.

**November 20, 2014 @ 11:00 AM**

City of Akron Water Reclamation Facility  
2460 Akron Peninsula Road  
Akron, Ohio 44313  
Reported by City of Akron Plant Operators

On November 20, 2014 @ 11:00 AM operators at the City of Akron Water Reclamation Facility (WRF) discovered clumps of polymeric material accumulating on the bar screens of the headworks area of the facility. Additional quantities of material were found fouling the bar screens and the non-potable plant water system screens during the weekend of November 22-23 after a wet weather event.

Based on verbal descriptions and photographs taken of the substance, Mr. Kevin Cherney, Emerald Performance Materials HSE Manager, indicated the possibility that operations at Emerald Performance Materials, LLC were the source of the released material and requested a portion of it to aid in positive identification. On Monday, November 24, Mr. Cherney, along with Mr. Ellis obtained a sample of the material

and on Tuesday November 25, Mr. Cherney sent an email confirming responsibility.

The City of Akron Industrial Pretreatment Section issued a violation classified as “Spill or Operation upset results in pass through, Plant Operation Interference or Sludge/Compost Contamination” according to the “Enforcement Response Guide”. The violation is subject to a fine of \$1,000 plus costs associated with remediation, which totaled \$500.

As a result of the unintentional release, Emerald implemented a comprehensive correction plan to prevent future releases.

### 3.3.2.2 Spills to Surface/Groundwater

There were no incidents of Spills to Surface or Groundwater investigated by the Industrial Pretreatment Program during 2014.

### 3.3.3 Investigations

The Industrial Pretreatment program conducts investigations in the following areas:

- Underground Storage Tank facilities or other Groundwater Remediation facilities
- Nonsignificant Industrial investigations
- Special discharges requests from industrial users.

#### 3.3.3.1 Non-Significant Industries

During 2014, reviews of non-significant industries were conducted. The reviews involved mailing the Wastewater Discharge Disclosure Declaration Short Form (WDDD-SF) to industries that discharge in the City of Akron wastewater collection system. A more detailed description of these reviews is provided in Appendix D. The current breakdown by status is shown on the following table.

<b>Table 3-1 Nonsignificant Industrial User Status</b>		
<b>STATUS</b>	<b>2014</b>	<b>2013</b>
Nonsignificant Effects	277	249
Unclassified	145	143
Not in Service Area	55	55
Closed	313	305
Out of Business	359	331
Moved	97	94
<b>Total</b>	<b>1246</b>	<b>1177</b>

### 3.3.3.2 Discharge Authorizations

Periodically the Industrial Pretreatment Program will issue Discharge Authorizations for discharges that would not necessarily require a Discharge Permit.

Discharge Authorizations are issued for groundwater clean-up operations, including remediation for Underground Storage Tank (UST) related contamination, and other groundwater contamination related to industrial activity. These authorizations are issued effective for one calendar year, and require such reporting that allows the City to recover costs for treatment, keeps the Industrial Pretreatment Program informed on the progress of the clean-up, verifies compliance with discharge limits and verifies proper maintenance of the treatment system. These discharges are prohibited during wet weather, with Best Available Technology (BAT) required to assure compliance with this restriction.

Discharge Authorizations are also issued for one-time discharges. One-time discharges could result from the pilot phase of groundwater clean-up projects or from periodically generated industrial wastewaters that are not otherwise subject to Categorical Regulations or in excess of Local Limitations if left untreated.

The following is a summary of discharges that were subject to Discharge Authorizations during 2014.

#### 3.3.3.2.1 Ongoing Discharges

**Ashland Distribution Company, 200 Darrow Road, Akron, Ohio 44305 (Permit SI-020)**

Purpose: UST Contamination Remediation

System idled on 11/18/14 while pilot project is conducted. No discharge to the sanitary sewer until further notice.

Site managed by: EHS Support, Mogadore, Ohio 44260

**BP #05744, 922 Southeast Avenue, Tallmadge, Ohio 44278 (Permit GW-004)**

Purpose: UST Contamination Remediation

Treatment System: Dual Phase Extraction – Groundwater and Soil Vapor Extraction (SVE)

No discharge to the sanitary sewer occurred in 2014.

Site managed by: ARCADIS U.S. Inc., 1100 Superior Ave., Suite 1250, Cleveland, Ohio 44114.

**City of Akron - West Side Maintenance Facility, 1540 Copley Road, Akron, Ohio 44320 (Permit GW-006)**

Purpose: UST Contamination Remediation

Treatment System: Dual Phase Extraction – Groundwater and Soil Vapor Extraction (SVE)

No discharge to the sanitary sewer occurred in 2014.

Site managed by: KU Resources, Inc., 641 West Market Street, Akron, Ohio 44303.

**Middlebury East Remediation Project, 903 East Exchange Street, Akron, Ohio 44278 (Permit GW-007)**

Purpose: UST Contamination Remediation

Treatment System: Dual Phase Extraction – Groundwater and Soil Vapor Extraction (SVE)

No discharge to the sanitary sewer occurred in 2014.

Site managed by: ARCADIS U.S. Inc., 222 South Main St., Suite 300, Akron, Ohio 44308.

3.3.3.2.2 One-Time Discharges (in chronological order)

**GOJO Industries – EDS Discharge, 3783 State Road, Cuyahoga Falls, Ohio 44223**

On March 14, 2014, a total of approximately 60,000 gallons of Emergency Discharge System (EDS) process wastewater was tested for pH, COD, BOD, TSS, TPH and discharged to the City of Akron sanitary sewer system. The discharge occurred after the three storage tanks reached capacity. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**Owens Corning – Pond Water Discharge, 170 South Avenue, Tallmadge, Ohio 44278**

On April 7, 2014, a total of approximately 42,000 gallons of Line 2 process pond water was tested for Zinc, Lead, Copper, pH and discharged to the City of Akron sanitary sewer system. The pond was emptied for maintenance. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**The University of Akron – 146 Hill St., Street, Akron, Ohio**

On May 5, 2014, a total of 12,149 gallons of stormwater was tested using EPA SW-846 Method 8260 and discharged to the City of Akron sanitary sewer system. The stormwater was accumulated at an Above Ground Storage Tank (AST) secondary containment dike. The result of the analysis showed the stormwater to be free of any contaminants. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**GOJO Industries – EDS Discharge, 3783 State Road, Cuyahoga Falls, Ohio 44223**

On May 5, 2014, a total of approximately 40,000 gallons of Emergency Discharge System (EDS) process wastewater was tested for pH, COD, BOD, TSS, TPH and discharged to the City of Akron sanitary sewer system. The discharge occurred after the three storage tanks reached capacity. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**GOJO Industries – EDS Discharge, 3783 State Road, Cuyahoga Falls, Ohio 44223**

On May 30, 2014, a total of approximately 50,000 gallons of Emergency Discharge System (EDS) process wastewater was tested for pH, COD, BOD, TSS, TPH and discharged to the City of Akron sanitary sewer system. The discharge occurred after the three storage tanks reached capacity. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**R K Hydro-Vac, Inc. Akron North High School, 985 Gorge Blvd, Akron, Ohio**

On June 19, 2014, the City of Akron Industrial Pretreatment department authorized the discharge of approximately 12,000 gallons of wastewater generated from a power wash roof cleaning operation over a four (4) day period to the City of Akron sanitary sewer system. The wastewater was filtered through a micro-screen prior to discharge. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**Summa Health Systems – Akron City Hospital, Akron, Ohio 44304  
Emergency Department: Decontamination Wastewater Storage  
Tank Discharge**

On July 8, 2014, the City of Akron Industrial Pretreatment department authorized the discharge of approximately 500 gallons of Emergency Department decontamination wastewater stored in a 2,000-gallon storage tank located at Akron City Hospital to the City of Akron sanitary sewer system. The wastewater consisted of city water that had been used to clean patients prior to entering the hospital's Emergency Department (ED). Wastewater samples indicated that there were no materials present that would be harmful if discharged to the sanitary sewer system. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**GOJO Industries – EDS Discharge, 3783 State Road, Cuyahoga Falls, Ohio 44223**

On July 31, 2014, a total of approximately 60,000 gallons of Emergency Discharge System (EDS) process wastewater was tested for pH, COD, BOD, TSS, TPH and discharged to the City of Akron sanitary sewer system. The discharge occurred after the three storage tanks reached capacity. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**The University of Akron – 146 Hill St., Street, Akron, Ohio**

On August 7, 2014, a total of 4,050 gallons of stormwater was tested using EPA SW-846 Method 8260 and discharged to the City of Akron sanitary sewer system. The stormwater was accumulated at an Above Ground Storage Tank (AST) secondary containment dike. The result of the analysis showed the stormwater to be free of any contaminants. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**GOJO Industries – EDS Discharge, 3783 State Road, Cuyahoga Falls, Ohio 44223**

On August 28, 2014, a total of approximately 35,000 gallons of Emergency Discharge System (EDS) process wastewater was tested for pH, COD, BOD, TSS, TPH and discharged to the City of Akron sanitary sewer system. The discharge occurred after the three storage tanks reached capacity. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**R K Hydro-Vac, Inc. Coventry Middle School, 3257 Cormany Rd., Coventry Township, Summit Country, Ohio**

On August 28, 2014, the City of Akron Industrial Pretreatment department authorized the discharge of approximately 4,000 gallons of wastewater generated from a power wash roof cleaning operation over a two (2) day period to the City of Akron sanitary sewer system. The wastewater was filtered through a micro-screen prior to discharge. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**Sprint Communications – 120 North Broadway Street, Akron, Ohio**

On October 9, 2014, the City of Akron Industrial Pretreatment department authorized the discharge of approximately 1000 gallons of landfill-contaminated leachate to the City of Akron sanitary sewer system. The wastewater was sampled for Diesel Range Organics (DRO) and was found to have less than the reporting limit of 0.193 mg/L. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

**GOJO Industries – EDS Discharge, 3783 State Road, Cuyahoga Falls, Ohio 44223**

On November 3, 2014, a total of approximately 35,000 gallons of Emergency Discharge System (EDS) process wastewater was tested for pH, COD, BOD, TSS, TPH and discharged to the City of Akron sanitary sewer system. The discharge occurred after the three storage tanks reached capacity. The discharge was planned and approval for discharge was granted by the City of Akron prior to discharge.

### **3.4 Priority Pollutant Scan**

The NPDES Permit requires an annual priority pollutant scan of the Akron Water Reclamation Facility influent, effluent and sludge. The scan for 2014 is reported on EPA form 4221 and can be found in the EPA Forms section of this report.

The following pollutants were detected in the influent, effluent, or sludge and were identified as being among the top ten (10) most prominent peaks on the plots (estimated concentrations):

#### **n-Hexadecanoic Acid (CAS # 57-10-3)**

Influent: 465 µg/L

Sludge: 1,740 mg/Kg

Hexadecanoic acid is also known as Palmitic acid and is insoluble in water. Palmitic acid is a fatty acid that is found in many natural oils & fats and is used in making soaps.

A maximum concentration level of 320 mg/L in drinking water has been established.

#### **Octadecanoic Acid (CAS # 57-11-4)**

Influent: 328 µg/L

Sludge: 945 mg/Kg

Octadecanoic acid is also known as stearic acid. It occurs in many animal and vegetable fats and oils, but it is more common in animal fat than vegetable fat. Stearic acid is useful as an ingredient in making candles, plastics, dietary supplements, oil pastels and cosmetics, and for softening rubber. It is used to harden soaps, particularly those made with vegetable oil. Stearic acid is used in aerosol shaving cream products. Stearic acid is also used as a parting compound when making plaster castings from a plaster piece mold or waste mold and when making the mold from a shellacked clay original. Esters of stearic acid with ethylene glycol, glycol stearate and glycol distearate, are used to produce a pearly effect in shampoos, soaps, and other cosmetic products. They are added to the product in molten form and allowed to crystallize under controlled conditions. In fireworks, stearic acid is often used to coat metal powders such as aluminum and iron. This prevents oxidation, allowing compositions to be stored for a longer period of time. It is used along with simple sugar or corn syrup as a hardener in candies. In compressed confections it is used a lubricant to keep the tablet from sticking to the die. It is used with zinc as zinc stearate as fanning powder for playing cards to deliver smooth fanning motion.

No permissible concentration levels in water are established at this time.

### **9-Octadecenoic acid, (E)- (CAS# 112-79-8)**

Influent: 275 µg/L

Sludge: 1,690 mg/Kg

9-Octadecenoic acid is also known as Elaidic acid which is the 9-trans isomer of oleic acid. It is a monounsaturated trans-fatty acid that can be found in partially hydrogenated cooking oils.

No permissible concentration levels in water are established at this time.

### **Ethanol, 2-(2-butoxyethoxy) (CAS# 124-17-4)**

Influent: 193 & 64 µg/L

Effluent: 35 µg/L

This material is used as a solvent for resins in lacquers, varnishes, and enamels. It is also used in varnish removers and in dry cleaning compounds. No permissible concentration levels in water are established at this time.

### **2-Propanol, 1-1-(1-methyl-1-2) (CAS# 1638-16-0)**

Influent: 178 & 158 µg/L

2-Propanol, 1-1-(1-methyl-1-2) is also known as Tripropylene glycol.

No further information is available at this time.

### **Cholesterol (CAS# 57-88-5)**

Influent: 105 µg/L

Sludge: 362 mg/Kg

Cholesterol is a white crystalline substance found in animal tissue and various foods that are normally synthesized by the liver and is a constituent of cell membranes.

Cholesteric materials are temperature sensitive and have color changing ability. Not only emulsifying and humectant properties but also liquid crystals properties of cholesterol and its derivatives (salts and esters) make them useful in the applications of cosmetics and pharmaceuticals.

No permissible concentration levels in water are established at this time..

### **4-Cyanocyclohexene (CAS# 100-45-8)**

Influent: 78 µg/L

No information is available at this time.

**Tetradecanoic Acid (CAS # 544-63-8)**

Sludge: 297 mg/Kg

Tetradecanoic acid is also known as Capric acid. Capric acid is a fatty acid obtained from animal fats and oils that are used in the manufacture of perfumes and fruit flavors.

No permissible concentration levels in water are established at this time.

**Cholestanol (CAS # 80-97-7)**

Sludge: 207 mg/Kg

No information is available at this time.

**Butanoic Acid (CAS # 107-92-6)**

Sludge: 207 mg/Kg

Butanoic acid is a colorless isomeric acid occurring in animal fats and used in disinfectants, emulsifying agents and pharmaceuticals.

No permissible concentration levels in water are established at this time.

**Pentanoic Acid (CAS # 109-52-4)**

Sludge: 147 mg/Kg

Pentanoic Acid is a clear colorless to pale yellow liquid with a penetrating unpleasant odor. No further information is available at this time.

No permissible concentration levels in water are established at this time.

**Squalene (CAS# 7683-64-9)**

Sludge: 18 mg/Kg dry

Squalene is an unsaturated aliphatic hydrocarbon that is found in human sebum and in the liver oil of sharks and is used as an intermediate in the biosynthesis of cholesterol.

No permissible concentration levels in water are established at this time.

**Table 3-2**  
TTO/TOMP Summary  
City of Akron, Ohio

Industrial User	SIU	Date	Date	Date											
	Permit	of TTO	of	2009		2010		2011		2012		2013		2014	
	#	Analysis	TOMP	1st Half	2nd Half										
The Akron Plating Co., Inc	MA-001	11-15-07	07-12-12	06-11-09	<b>12-23-09</b>	06-30-10	<b>12-17-10</b>	06-30-11	<b>12-15-11</b>	07-12-12	<b>12-18-12</b>	06-18-13	<b>01-08-14</b>	07-08-14	<b>12-23-14</b>
Beringer Plating, Inc.	MA-002	04-09-08	12-10-12	07-09-09	<b>12-31-09</b>	07-14-10	<b>12-27-10</b>	06-03-11	<b>12-23-11</b>	07-20-12	<b>12-10-12</b>	06-27-13	<b>12-16-13</b>	07-15-14	<b>01-12-15</b>
Lockheed Martin MS2	MA-004	12-13-12	01-18-13	06-15-09	<b>01-12-10</b>	06-30-10	<b>01-12-11</b>	06-16-11	<b>12-21-11</b>	05-22-12	<b>01-08-13</b>	05-29-13	<b>11-06-13</b>	07-28-14	<b>12-24-14</b>
Plate-All Plating, Inc.	MA-006	09-09-88	12-28-12	07-28-09	<b>01-08-10</b>	07-09-10	<b>01-17-11</b>	07-05-11	<b>01-06-12</b>	07-19-12	<b>12-28-12</b>	07-13-13	<b>01-17-14</b>	07-07-14	<b>01-05-15</b>
Universal Plating, Inc.	MA-007	02-22-96	12-21-12	06-29-09	<b>01-29-10</b>	06-30-10	<b>12-27-10</b>	06-08-11	<b>01-20-12</b>	07-24-12	<b>10-21-12</b>	07-26-13	<b>01-31-14</b>	08-14-14	<b>01-28-15</b>
Cornwell Quality Tools Co.	MA-009	09-20-12	11-15-12	05-19-09	<b>12-01-09</b>	05-27-10	<b>11-10-10</b>	06-14-11	<b>12-06-11</b>	05-08-12	<b>11-15-12</b>	06-24-13	<b>12-17-13</b>	06-24-14	<b>12-23-14</b>
Viasystems Cleveland, Inc.	MA-014	01-18-12	11-18-14	07-17-09	<b>01-28-10</b>	07-30-10	<b>01-31-11</b>	06-24-11	<b>12-19-11</b>	07-16-12	<b>01-23-13</b>	05-01-13	<b>11-12-13</b>	04-25-14	<b>11-14-14</b>
Meggit Aircraft Braking Systems	MA-016	04-30-09	07-06-12	07-03-09	<b>08-26-09</b>	06-24-10	<b>01-04-11</b>	06-23-11	<b>12-21-11</b>	07-05-12	<b>01-10-13</b>	06-28-13	<b>12-13-13</b>	07-02-14	<b>12-23-14</b>
H & M Metal Processing Co.	MA-017	01-05-10	12-04-12	07-03-09	<b>08-26-09</b>	06-24-10	<b>01-04-11</b>	06-23-11	<b>12-21-11</b>	07-05-12	<b>11-27-12</b>	07-31-13	<b>01-21-14</b>	06-12-14	<b>11-13-14</b>
Heritage Industrial - Kelly Ave.	MA-018	11-18-10	08-02-12			07-26-10	<b>01-31-11</b>	07-06-11	<b>01-24-12</b>	07-30-12	<b>01-31-13</b>	07-29-13	<b>01-28-14</b>	07-27-14	<b>01-06-15</b>
Coletene Whaledent	MA-020											07-31-13	<b>01-14-14</b>	07-15-14	<b>01-15-15</b>
Akron Anodizing & Coating Co.	SI-001	06-21-10	06-12-12	07-09-09	<b>01-06-10</b>	07-22-10	<b>01-06-11</b>	07-08-11	<b>01-06-12</b>	07-03-12	<b>01-17-13</b>	07-01-13	<b>01-20-14</b>	07-21-14	<b>01-05-15</b>
GMP Friction Products	SI-007	06-04-11	06-29-12	07-09-09	<b>08-19-09</b>	07-21-10	<b>12-28-10</b>	06-22-11	<b>01-10-12</b>	06-26-12	<b>01-16-13</b>	07-13-13	<b>01-31-14</b>	07-09-14	<b>01-23-15</b>
Akrom Metal Etching Co.	MI-006	12-21-11	12-10-12	06-28-09	<b>02-22-10</b>	07-29-10	<b>01-19-11</b>	07-28-11	<b>01-31-12</b>	07-30-12	<b>12-10-12</b>	07-17-13	<b>12-23-13</b>	07-23-14	<b>12-31-14</b>
Akron Steel Treating	MI-010	12-04-96	12-17-12	06-16-09	<b>01-04-10</b>	07-28-10	<b>12-21-10</b>	06-28-11	<b>01-20-12</b>	04-23-12	<b>10-10-12</b>	05-16-13	<b>11-22-13</b>	05-05-14	<b>11-18-14</b>
Heritage Industrial Finishing Div.	MI-035	06-02-09	08-02-12	07-21-09	<b>01-26-10</b>	07-26-10	<b>01-28-11</b>	07-06-11	<b>01-24-12</b>	07-30-12	<b>01-31-13</b>	07-29-13	<b>01-29-14</b>	07-27-14	<b>01-06-15</b>
Tri-County Hard Chrome	MI-077	03-25-90	08-17-12	05-01-09	<b>12-11-09</b>	06-15-10	<b>12-13-10</b>	06-15-11	<b>12-13-11</b>	06-15-12	<b>12-14-12</b>	06-14-13	<b>12-13-13</b>	06-13-14	<b>12-15-14</b>
Intgrated Roll Services	MI-087	03-25-90	01-28-13	06-02-09	<b>12-10-09</b>	05-18-10	<b>12-28-10</b>	06-28-11	<b>12-20-11</b>	06-08-12	<b>01-28-13</b>	06-26-13	<b>12-30-13</b>	07-18-14	<b>12-19-14</b>
The Martin Wheel Corp., Inc.	MI-092	06-13-12	12-17-12	07-21-09	<b>01-27-10</b>	07-16-10	<b>01-05-11</b>	07-08-11	<b>12-20-11</b>	07-16-12	<b>12-17-12</b>	07-03-13	<b>01-10-14</b>	07-23-14	<b>01-15-15</b>
Weaver Fabricating and Finishing	MI-102	N/A*	12-28-12	07-31-09	<b>01-26-10</b>	07-19-10	<b>01-14-11</b>	07-22-11	<b>01-18-12</b>	08-23-12	<b>12-28-12</b>	07-18-13	<b>01-31-14</b>	07-29-14	<b>01-15-15</b>

N/A\* = No process discharge

## SECTION 4 Mercury Pollution Minimization Program

### 4.1. Regulatory Requirement for a Mercury PMP

On September 1, 2011 the City submitted a Pretreatment Program Modification Request to revise local discharge limitations for Mercury from 0.005 mg/L to a Best Management Practice (BMP) in lieu of a numerical local limit for Mercury.

Analysis of data collected suggested a maximum allowable influent concentration (MAIC) of 35.4 ng/L was necessary to achieve the water quality standard of 1.3 ng/L of mercury in the final effluent. This corresponds to a maximum allowable headworks loading (MAHL) of 9.66 grams/day (0.02126 lbs/day), when multiplied by an average daily flow of 72.0 MGD through the Akron Water Pollution Control Station.

As is detailed below, the actual headworks concentrations and loadings averaged 45.7 ng/L and 0.02875 lbs/day during the period of data collection. Based on several years of data, the Industrial Pretreatment Program has calculated that the known industrial contributions to the Akron Publicly Owned Treatment Works (POTW) were as indicated in the following table:

<b>Table 4.1 Permitted Industrial Contribution to Headworks Mercury Loading</b> <i>Loading in pounds per day (lbs/day)</i>	
<b><i>Plant Data</i></b>	
Maximum Allowable Headworks Loading	0.02126
Measured Headworks Loading	0.02875
Excess	0.00749
<b><i>Contributions from Permitted Sources</i></b>	
Total of All Hospitals	0.00080
Total of all Permitted Industries other than Hospitals	0.00008
Total of all Permitted Sources	0.00088
Measured Headworks Loadings minus the total of all Permitted Sources	0.02787

Consequently, if all permitted sources were issued a limit of 0 ng/L, the Akron Water Pollution Control station headworks loading would be reduced to 0.02787 lbs/day, and the achievement of the water quality standard would not be expected. This does not, however, exempt the City from attempting to achieve water quality standards. Rather it obliges the City to determine the other sources of mercury and develop a Pollution Minimization Program (PMP) to reduce the mercury loading to the wastewater plant with the ultimate goal of achieving this standard.

The purpose for this section is to comply with the NPDES Permit Part II, BB, 4), which requires the City of Akron to submit an annual Pollution Minimization Program (PMP) report each year along with the permittee's annual pretreatment report. As required by the NPDES this section includes:

- a) All minimization program monitoring results for calendar year 2014,

- b) A list of potential sources of the pollutants that are subject to PMP requirements,
- c) A summary of all actions taken to meet the effluent limits for those pollutants and
- d) Any updates of the control strategy.

## **4.2. PMP Monitoring Results for Mercury**

### **4.2.1. Akron WPCS**

The Mercury Local Limits Program modification, in review, indicated a Maximum Allowable Influent Concentration (MAIC) of 34.6 ng/L, limited by the Water Quality Standard of 1.3 ng/L.

As illustrated in Table 1-4, found at the end of Section 1, influent mercury levels averaged 79.9 ng/L (130% in excess of MAIC). This is an increase from 51.9 ng/L in 2013. The corresponding effluent averaged 2.3 ng/L, which is in excess of the Water Quality Standard by nearly 77%.

The effluent samples are collected approximately sixteen hours, or one plant detention time after the influent samples. The Local Limits submittal indicated 96.4% removal efficiency as the basis for MAIC based on nine months of data collected between September of 2010 and June of 2011. Removal efficiencies for the data during 2014 averaged 97%, with a standard deviation of 1.2 % indicating that it is statistically identical to the basis removal efficiency.

The USEPA 503 Sludge Regulation limitation is 17 mg/kg. As can be seen from Table 1–5 and Figure 1-14, found at the end of Section 1, the monthly average concentration of this parameter in finished compost averaged 0.47 mg/Kg, less than 3% of the limit, with a maximum of 1.10 mg/Kg. It should be noted that in three months beginning in August, the mercury concentration in the biosolids was below the detection limit of 2.0 mg/Kg. This coincides with a switch from reporting on compost to reporting on dried and pelletized anaerobically digested biosolids. This suggests the possibility that mercury was introduced into the compost through the bulking agents used in the process.

### **4.2.2. Domestic Background Sampling**

The Mercury Local Limits program modification submitted September 1, 2011 indicated an average domestic background concentration of 25.4 ng/L based on a total of twelve samples collected in 2010 and 2011. Five separate sites were each collected once during 2010. Those five sites were collected again in 2011 along with two additional sites. An outlier, measuring 204 ng/L, from one of the sites in 2010 skewed this average. When this same site was sampled again in 2011 the sample measured 19.3 ng/L. If the outlier is not included in the analysis the average background concentration drops to 9.2 ng/L with a standard deviation of 5.9 ng/L. This concentration corresponds to a domestic loading of 0.0054 lbs/day.

During 2011 the seven samples collected averaged 7.6 ng/L, which is within one standard deviation of the overall average.

Due to staffing changes there was no background sampling conducted during calendar year 2012.

In 2013 background sampling resumed. Four samples were collected which averaged 2.62 ng/L. Two were repeats from sites previously sampled. An additional background location was initiated from which two samples were collected.

In 2014 three samples were collected, which averaged 10.3 ng/L.

### **4.3. Potential Sources of Mercury**

Of the 0.02875 lbs/day mercury loading to the wastewater plant only 0.00088 lbs/day (3.1 %) can be attributed to permitted sources and 0.00539 lbs/day (18.7%) to domestic background. The remaining 0.02248 lbs/day is from unknown sources.

As proposed in the Plan of Study submitted with the Mercury Local Limits Pretreatment Program Modification Request on September 1, 2011 the identified possible contributors are medical clinics, medical laboratories, veterinary clinics, dental offices and schools. Other possible sources are landfill leachate and the municipal water supply. Sewer cleaning activities are also a possible source of mercury, as such activities can dislodge deposits of mercury. Another suspected source is atmospheric deposition, which could have an impact both in the combined sewer areas, and also in the watershed drainage basin for Lake Rockwell, which is the main supply for drinking water to the areas served by the Akron POTW.

#### **4.3.1. Dental Offices**

Dental Offices are a potential source of mercury loading. It is the one source for which disposal of mercury contaminated wastewater is the standard practice. Highly efficient amalgam separators have been available for the past decade. Despite their availability the reality is that dentists will not be likely to acquire and install one of these devices unless they are required to do so due to cost. There are other aspects of a good dental office BMP, which are probably already practiced in varying degrees because of the low or no cost associated with such practices. Experience throughout the country has shown that dental amalgam, the primary form of mercury discharges from dental offices, largely ends up in the biosolids. Even in places where a high percentage of dental offices have installed the highly efficient amalgam separators, wastewater plants have not experienced a corresponding drop in mercury levels in their outfalls. Reductions have, instead, been notably measured in their biosolids. And so, while dental offices, as an industry sector, may be an appreciable contributor to the total mercury loading measured in the influent, they are not a significant contributor towards what is discharged into receiving waters.

#### **4.3.2. Water Supply**

The watershed from which Akron Water Supply draws water is down wind from numerous coal burning facilities, including the Toledo and Chicago areas. Any atmospheric deposition of mercury in the watershed is subject to precipitation, adding a mercury burden to the water supply.

#### **4.3.3. Sewer Cleaning**

In December of 2014 the City completed the first five-year cycle of inspecting all of the sewers and cleaning as necessary. This may result in a drop in mercury in the influent since legacy mercury in the sewers has been removed.

#### **4.4. Summary of Actions Since September 1, 2011**

##### **4.4.1. Legal Authority**

On March 19, 2013, Ohio EPA approved Program Modifications, which included changes necessary to give the Industrial Pretreatment Program the authority to issue Best Management Plans (BMPs) in general and specifically in lieu of numerical local limits for Mercury.

##### **4.4.2. BMP Development**

In order to shorten the development time of BMP's for use in the City of Akron Industrial Pretreatment Program, samples of BMP's as utilized in other communities were acquired and modified as necessary.

##### **4.4.2.1. Dental BMP**

###### 2011

In order to shorten the development time of BMP's for use in the City of Akron Industrial Pretreatment Program, samples of BMP's as utilized in other communities were acquired. Since it is considered the most likely substantial source of mercury, the Dental Office sector was the focus of BMP development during the year. A Dental Office BMP was drafted. On November 15, 2011 a Akron area Dental BMP Stakeholders Group meeting was convened at the wastewater plant for the purpose of establishing a working relationship, and to review the Draft BMP. Representatives attended this meeting from the Ohio Dental Association and the Akron Dental Society, as well as a few dentists from the area representing a variety of different practices. In addition two individuals responsible for the Dental BMP program at the Northeast Ohio Regional Sewer District attended bringing their experience as the District is considerably farther along in their development. The result of this meeting was encouraging, with a few adjustments to the Draft BMP and encouragement to pursue implementation, especially because of the impending Federal Action to mandate the use of amalgam separators. Also the City developed a strategy for potentially acquiring grant money to fund an amalgam separator rebate program to incentivize cooperation among the effected dental practices.

###### 2012

A Dental Office BMP was developed. Through a review of the data, and after lengthy discussion with Ohio EPA it was determined to be appropriate to make the use of 99% Efficient Amalgam Separator a "Strongly Recommended" rather than a "Mandatory" BMP. Sufficient evidence exists that essentially all of the mercury from dental amalgam is removed from the waste stream to the biosolids, so reducing the amount of amalgam in the sewers will have little impact on the amount of mercury being discharged to the Cuyahoga River. Since the mercury loadings in the biosolids are less than 2% of the limit for biosolids, there is no need to implement limits protective of the biosolids. A copy of the BMP is included at the end of this section.

A General Dental User Permit was developed for use in conjunction with the BMP. A copy of the Permit is included at the end of this section.

A list of Dental Users was developed with the assistance of the Akron Dental Society for the initial mailing. Also, the Industrial Pretreatment Engineer presented an update on the Akron Dental BMP Program at a meeting of the Akron Dental Society. The list of Dental Users is included at the end of this section.

## 2013

At the end of 2013 the City mailed out information packets to all dentists in the City of Akron and in the tributary areas in which the City has responsibility for the Industrial Pretreatment Program. This information included the Dental Permit, the Dental BMP Form, the Dental User Annual Report Form, and a cover letter to formally explain what was required. In addition, the electronic version of all of these documents was given to the Pretreatment Coordinator for the Department of Environmental Services of Summit County. These were passed through to their customers in areas tributary to the Akron Water Reclamation Facility making only minor adjustments. This effectively established the same dental BMP requirements for these practices.

## 2014

In 2014 information packets were distributed to dentists in the City of Fairlawn through the office of Service Director of the City of Fairlawn, since the City of Akron does not have responsibility for the pretreatment program in the City of Fairlawn.

### **4.4.2.2. Industrial User BMP**

In 2012 an Industrial User BMP was developed for the use with both Non-Significant Industries and also with permitted industries, other than hospitals. A copy of the Industrial User BMP is included at the end of this section.

In 2013 the Industrial User BMP was implemented at permitted industries identified as significant sources of mercury based on sampling conducted in 2010 as summarized below.

### **4.4.2.3. Medical Facility BMP**

A Medical Facility BMP was developed for use with veterinary clinics and medical facilities that are not currently already permitted by the City of Akron Industrial Pretreatment Program. In addition a preliminary list of medical facilities was generated. A copy of this BMP and the list of Medical Facilities is included at the end of this section.

In 2013, with the final approval of the Industrial Pretreatment Program modifications adopting BMPs as local limits, the City modified the Industrial User Permits for all four hospitals incorporating the BMP requirements into their permits.

In 2014 the City conducted enforcement actions at three of the hospitals requiring implementation of their BMPs. All of the hospitals had self-monitoring or city-monitoring mercury results in excess of 500 ng/L, which is considered indicative of a significant source. The hospitals were required to develop a plan to identify the source and take measures to abate those sources. There is an expectation that these efforts will be successful based on the experiences of similar initiatives at two of the hospitals where sources of mercury were discovered, abated resulting in a significant drop in mercury concentrations in their discharges.

### **4.4.2.4. Schools**

A "School Mercury Checklist" was developed for use in the Akron Mercury PMP. A copy of this checklist can be found at the end of this section. Also a preliminary list of schools was developed, which can also be found at the end of this section.

#### 4.4.2.5. Sampling Program

##### 4.4.2.5.1. Hospital Sampling Results

Industrial User Permits issued to hospitals require four self-monitoring sampling events each semi-annual reporting period in support of their BMP. Hospitals are sub-classified as Significant Effects Industries. This obligates the City to sample each site three times per year. There are five permitted hospitals in the Pretreatment Program. Summa Health Systems – Akron City Campus (SI-002) has one outfall. Akron General Medical Center (SI-003) has one outfall. The Children’s Hospital Medical Center of Akron (SI-005) has four outfalls. Summa Health Systems – St. Thomas Campus (SI-015) has two outfalls. Summa Health Systems – Western Reserve Hospital (SI-021) has two outfalls. During 2013, as indicated in Form AR-3 found in the Ohio EPA Forms section of this report, the City sampled two of the hospitals five times. The other two hospitals were sampled four times.

##### 4.4.2.5.2. Non-Hospital Significant Industrial User Sampling Results

In preparation for the Mercury Plan of study the City collected samples from all of the permitted industries, in addition to the hospitals, to analyze for mercury. The purpose for this effort was to screen the list for those that would merit more investigation. The majority of this sampling occurred in 2010 with one additional industry sampled in 2011.

The results of this sampling effort can be found in Table 4.2. Despite mercury concentrations considerably above the Maximum Allowable Concentration for the top five discharges, the loading total of all permitted dischargers other than hospitals is only 0.000075 lbs/day, which is less than 0.3% of the total headworks loading of mercury.

Permit	Company Name	Date	Units	Result
MA-017	H&M Metal Processing Co.	10-21-2010	ng/L	180
SI-025	Georgia-Pacific Corrugated, LLC	10-08-2010	ng/L	114
SI-004	Akron Paint & Varnish, Inc.	10-21-2010	ng/L	62.5
MI-101	Akron Electric Inc.	06-02-2011	ng/L	58.6
MI-008	Beacon Journal Publishing	10-28-2010	ng/L	37.3
MI-084	Malco Products, Inc.	10-21-2010	ng/L	27.7
MI-028	Goodyear Tire & Rubber Mix Center	10-15-2010	ng/L	21.2
SI-010	Hayes-Lemmerz International – Commercial Highway, Inc.	08-25-2010	ng/L	13.7
MI-009	Chemionics Corporation	10-08-2010	ng/L	12.8
MI-010	Akron Steel Treating	10-24-2010	ng/L	9.65
SI-007	GMP Friction Products	08-26-2010	ng/L	8.58
MA-015	OMNOVA Solutions Inc. - Akron Plant	09-02-2010	ng/L	7.90
MI-104	Akron Foundry Co - Plant 4	11-04-2010	ng/L	5.34
MI-044	Lancer Dispersions, Inc.	10-14-2010	ng/L	4.84
MI-098	Americhem, Inc.	10-08-2010	ng/L	2.98
MA-016	Meggitt Aircraft Braking Systems	11-04-2010	ng/L	2.04
SI-017	Akron Energy Systems, LLC.	10-15-2010	ng/L	1.85
MA-001	The Akron Plating Company, Inc.	08-26-2010	ng/L	1.84
MA-003	Emerald Performance Materials, LLC	10-21-2010	ng/L	1.66
MA-004	Lockheed Martin MS2 - DSS	09-20-2010	ng/L	1.53

Table 4.2. Results of Mercury Sampling at non-Hospital Permitted Industry.

Permit	Company Name	Date	Units	Result
MA-009	Cornwell Quality Tool Company	08-26-2010	ng/L	1.39
MI-020	Firestone Polymers, LLC	10-28-2010	ng/L	1.34
MA-018	Heritage Industrial Finishing - Kelly Ave Facility	10-25-2010	ng/L	1.32
MA-016	Meggitt Aircraft Braking Systems	09-24-2010	ng/L	1.13
MA-014	DDi Cleveland Corp.	09-24-2010	ng/L	0.958
SI-001	Akron Anodizing & Coating Co.	10-08-2010	ng/L	0.896
MA-002	Beringer Plating, Inc.	10-14-2010	ng/L	0.775
MI-035	Heritage Industrial Finishing Corp.	10-22-2010	ng/L	0.693
MI-006	Akron Metal Etching Company	10-28-2010	ng/L	0.620
MA-011	Akron Regional Landfill	09-24-2010	ng/L	< 0.500
MI-007	Americhem Inc.	10-28-2010	ng/L	< 0.500
MI-092	The Martin Wheel Corp, Inc.	10-14-2010	ng/L	< 0.500
MI-097	Akron Foundry Company	10-15-2010	ng/L	< 0.500
SI-012	The Hygenic Corporation	10-14-2010	ng/L	< 0.500
SI-020	Ashland Chemical	10-15-2010	ng/L	< 0.500

#### 4.4.2.6. Dental Practice Influenced Sewer Samples

During the third quarter of 2011, the City identified eight locations in the collection system that would be impacted by dental facilities. The nature of the sites was varied as to location throughout the city, size of sewer, and number of dentists tributary to the sample location. This was an attempt to account for potential differences.

The purpose for this effort was two-fold. First, this established a base line of mercury concentrations so that reductions resulting from a proposed Dental BMP Program could be observed. Secondly, this data would provide information to estimate the magnitude of mercury loading that could be attributed to dental facilities and thus a perspective on how much benefit could result from controlling this source.

In 2013 the City collected a background sample from four of these locations.

Date	Hg-001	Hg-002	Hg-003	Hg-004	Hg-005	Hg-006	Hg-007	Hg-008
09/16/11	> 5,000	226	67	1,498	660	288	961	> 5,000
09/20/11	> 5,000	> 5,000	230	956	404	284	356	2,375
7/17/2013	162	2						655
7/24/2013				3				

#### 4.4.2.7. Unaccounted Mercury Source Investigations

##### 4.4.2.7.1. Atmospheric Deposition

According to the National Atmospheric Deposition Program, mercury reaches the surface water primarily through atmospheric deposition, both wet and dry. Wet deposition is pollution, washed out of the atmosphere by rain. Dry deposition is pollutants that are deposited to the ground,

trees, etc. from the atmosphere. Estimates suggest mercury wet deposition accounts for 50% to 90% of the mercury load to most inland water bodies and estuaries in the U.S. Elemental ( $\text{Hg}^0$ ), divalent ( $\text{Hg}^{+2}$ ), and particulate mercury ( $\text{Hg}_p$ ) are all important in both wet and dry deposition, most likely dominated by the  $\text{Hg}_p$  and  $\text{Hg}^{+2}$  forms, since  $\text{Hg}^0$  is only slightly soluble in water and has very low deposition velocities. Wet deposition rates are variable, and tend to have summer maximums. Dry deposition rates to forest canopies may be higher than wet deposition rates in terrestrial ecosystems.<sup>1</sup>

Sampling conducted at Akron Water Supply addressed in Paragraph 4.4.2.7.2 certainly indicates this phenomenon is having an impact.

Additional mercury, due to atmospheric deposition is expected to reach the plant through the Combined Sewer area. There hasn't been sampling to demonstrate this assertion, but background sampling in the future may be timed to include sampling during wet weather. In addition the WRF lab is considering conducting atmospheric deposition tests.

#### **4.4.2.7.2. Akron Water Supply Sampling**

At the end of 2011, single samples were collected at the mouth and at the dam of Lake Rockwell, the immediate source from which Akron Water Supply draws its water for treatment. Mercury was found at 127 ng/L for the sample collected at the mouth, and at 86 ng/L for the sample collected at the dam.

Further sampling was done of finished tap water. A single sample was collected at the water treatment plant, just prior to the distribution pumps. Mercury was measured in this sample at 51 ng/L. Another sample was collected from the tap at the Akron Water Pollution Control Station. Mercury was measured in this sample at 21 ng/L. If these results are combined the average mercury concentration in the water delivered to the city is 36 ng/L. By reference, and to re-iterate, the Maximum Allowable Influent Concentration for mercury is 35.6 mg/L. The Water Plant processes an average of 35 MGD of which 29 MGD is in areas served by the Akron POTW. Thus an average daily loading of 0.0087 lbs/day is attributed to the water supply. The data also suggests that the mercury comes from the watershed and is a result of atmospheric deposition.

This data also supports the theory that atmospheric deposition of mercury in combined sewer areas is another real but uncontrollable source of mercury to the WRF.

#### **4.4.2.7.3. Domestic Background Sampling**

Since 2010 the City of Akron has been testing samples from domestic background sampling locations throughout the City for mercury utilizing EPA Method 1631. The eight sites were selected to exclude industrial waste and discharges from dental offices. The results are tabulated below. If the 10/19/2011 result at BG-05 is discounted as an atypical outlier the average background concentration is 8.24 ng/L for a domestic loading of 0.00482 lbs/day when multiplied by the domestic/commercial volume usage of 70.2 MGD

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<sup>1</sup> © 2012 National Atmospheric Deposition Program, [Hhttp://nadp.sws.uiuc.edu/MDN/why.aspx](http://nadp.sws.uiuc.edu/MDN/why.aspx)

<b>Table 4.4 Domestic/Commercial Background Site Results</b>			
<b>Site</b>	<b>Date</b>	<b>Units</b>	<b>Result</b>
BG-001			
	10-22-2010	ng/L	8.4
	05-31-2011	ng/L	1.41
	06-20-2013	ng/L	4.91
BG-002			
	10-22-2010	ng/L	16.2
	05-31-2011	ng/L	6.73
	08-01-2014	ng/L	1.3
BG-003			
	05-31-2011	ng/L	12.1
	08-07-2014	ng/L	21.5
BG-004			
	10-21-2010	ng/L	12.5
	05-31-2011	ng/L	9.41
	06-20-2013	ng/L	< 0.5
BG-005			
	10-19-2010	ng/L	204
	05-31-2011	ng/L	19.3
BG-006			
	05-31-2011	ng/L	2.04
BG-007			
	10-22-2010	ng/L	11.2
	05-31-2011	ng/L	1.96
BG-008			
	07-17-2013	ng/L	2.73
	08-01-2014	ng/L	8.15

#### **4.5. Control Strategy Updates**

##### **4.5.1. BMP Implementation**

###### **4.5.1.1. Dental BMP**

During 2015 the City will continue to implement the Dental BMP..

###### **4.5.1.2. Hospital BMP**

During 2015 the City will continue to implement the Hospital Mercury BMP.

###### **4.5.1.3. Medical Facility BMP**

During 2015 the City will begin implementation of the use of the Medical Facility BMP at veterinary clinics and at medical facilities not already permitted, by the Industrial Pretreatment Program.

#### **4.5.1.4. Industrial User BMP**

During 2015 the City will implement the use of the Industrial User BMP at all permitted industries in the course of the inspection cycle. Also, these BMPs will be sent to the Non-Significant Industries required to update their information this year.

#### **4.5.2. Sampling Efforts**

The City has budgeted funds for low-level mercury tests for the year 2015. With this budget the City will repeat background sampling and dental impacted sewer sampling to further establish base line conditions to enable tracking effectiveness of the initiatives. In addition the city will re-sample drinking water samples, and those industries that had results in excess of MAIC.

## **SECTION 5 PROGRAM EVALUATION**

### **5.1. Approved Program Components**

This review consists of evaluating the legal authority (local ordinance), changes to State and Federal programs, operating procedures, finances and local limitations.

#### **Legal Authority**

The legal authority for the local, City of Akron Pretreatment Program, is provided in the Code of Ordinances of the City of Akron, Chapter 50.44 through 50.99, 1985 as amended and/or supplemented in 1991 and 1994. The Code provides authority to meet the original program requirements along with revisions stemming from the Pretreatment Implementation Review Task Force revisions of 1985 and the Domestic Sewage Study of 1986. It also incorporated the Enforcement Response Guide (ERG).

The Code was modified in 1994 to include provisions for stormwater management per the stormwater application requirements. These provisions aid in the enforcement of the Illicit Discharge Elimination Program by prohibiting discharges to the municipal storm sewer system not composed entirely of stormwater without authorization from the State of Ohio.

The Code was also modified in 1994 to include provisions for regulating tributary communities. The Tributary Community Discharge Program was implemented through the issuance of community discharge permits. The permits delineate the annual average rate and peak design flow which can be discharged to a given point of discharge or meter station, the requirement to eliminate separate sanitary sewer overflows up to the specific design storm event, peak combined sewer flows, the elimination of dry weather combined sewer overflows, induction and control of wet weather combined sewer overflows and best management practices.

The code was modified again in September 2006 to include further provisions for stormwater management. A new section entitled "Erosion and Sediment Control; Post-Construction Storm Water Quality" was enacted to develop, implement and enforce a program to reduce pollutants in stormwater runoff from construction activities. The section contains requirements that must be completed prior to undertaking soil disturbing activities; including the completion of a Stormwater Pollution Prevention Plan, descriptions of the Best Management Practices used during active construction and post-construction and penalties for non-compliance.

Code modifications in 2013 incorporated pretreatment streamlining regulations and a new section titled "Discharge criteria for fats, oils and grease" to designate authority to regulate and control the discharges from food service establishments in the sewer system. These changes also required modifications to the ERG.

No additional changes to the Code are required at this time.

## **State and Federal Programs**

Future changes that may require program modifications include, but are not limited to the following:

- Ohio EPA implementation of the Water Quality Guidance for the Great Lakes System, (GLI)
- Clean Water Act Re-authorization,
- USEPA and Ohio EPA Combined Sewer Overflow Control Strategies,
- Ohio EPA Antidegradation Policy,
- Ohio EPA Municipal Storm Water Permit for the City of Akron, Effective February 1, 1998,

## **Operating Procedures**

General guidance for operating procedures was provided in the original program and the Enforcement Management System of May 21, 1991. These were modified in 2012 with these modifications approved by Ohio EPA in 2013. These documents provide adequate guidance at this time.

## **Finances**

The financing for the City of Akron Pretreatment Program is included in the budget of the Akron Water Reclamation Services, which is supported by industrial user fees. The Industrial Users, as classified by the accounting group, paid a Field Monitoring surcharge at a rate of \$0.603 per thousand gallons. This surcharge is reviewed and adjusted annually along with sewer user fees.

## **Local Limitations and Pretreatment Streamlining**

Local limitations were previously discussed in detail. Ohio EPA approved the revisions of May 1995 on September 26, 1995. Program Modification requests submitted to Ohio EPA on March 1, 2011 to incorporate changes to the local limitations, and also to incorporate pretreatment streamlining regulations were approved in 2013. The Ordinance, Enforcement Response Guide, and the Industrial User Permits were all modified to implement the changes. Another change to local limits was submitted to and approved by Ohio EPA in 2013.

### **5.2. Accomplishments**

The following is a list of major accomplishments for the Industrial Pretreatment Program in 2014. A detailed review is provided in the previous sections of this report.

- The city collected \$11,700 in fines from 6 industrial users.
- The calendar year 2014 annual inspections were conducted on schedule and in a professional manner.

- Met all regulatory and program requirements throughout calendar year 2014.

The Program's excellence, demonstrated in this Annual Report, is the result of a team effort of the Program staff (past and present). The City of Akron's Industrial Pretreatment Program's mission is to:

***"... prevent  
interference,  
pass-through  
and  
sludge contamination  
while meeting  
regulatory requirements ..."***

**PRETREATMENT PERFORMANCE SUMMARY**

POTW:	<b>City of Akron</b>		
NPDES PERMIT NO.:	<b>OEPA3PF00000*ND</b>		
REPORTING PERIOD:	<b>January 1, 2014</b>	TO	<b>December 31, 2014</b>
TOTAL SIGNIFICANT INDUSTRIAL USERS (SIUs):			<b>53</b>
TOTAL CATEGORICAL INDUSTRIAL USERS (Including Non-Discharging):			<b>26</b>
TOTAL SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USERS:			<b>27</b>

<b>COMPLIANCE MONITORING PROGRAM</b>	
# OF EFFECTIVE CONTROL DOCUMENTS	<b>53</b>
# OF SIUs INSPECTED	<b>53</b>
# OF SIUs SAMPLED	<b>43</b>

<b>SIGNIFICANT NONCOMPLIANCE ASSESSMENT (SNC)</b>	
# OF SIUs IN SNC (Categorical/Non-Categorical)	<b>2/1</b>
# OF SIUs IN SNC FOR SAMPLING VIOLATIONS	<b>3</b>
# OF SIUs IN SNC FOR REPORTING VIOLATIONS	<b>0</b>
# OF SIUs IN SNC FOR COMPLIANCE SCHEDULE VIOLATIONS	<b>0</b>

<b>ENFORCEMENT ACTIVITY</b>	
# OF SHOW-CAUSE HEARINGS AND ADMINISTRATIVE ADJUSTMENT HEARINGS	<b>0</b>
# OF COMPLIANCE SCHEDULES ISSUED	<b>0</b>
# OF ADMINISTRATIVE ORDERS ISSUED	<b>0</b>
# OF CIVIL SUITS FILED	<b>0</b>
# OF CRIMINAL SUITS FILED	<b>0</b>
AMOUNT OF PENALTIES COLLECTED (Total dollars/# IUs assessed) Includes recoverable costs	<b>\$11,700/6</b>
# OF FACILITIES PUBLISHED	<b>3</b>

# INDUSTRIAL USER INVENTORY AND MONITORING

Page 1 of 6

POTW: City of Akron

PERIOD COVERED: January 1, 2014 to December 31, 2014

FACILITY NAME & ADDRESS	APPLICABLE STANDARDS	POTW IU MONITORING		IU SELF MONITORING	
		# OF INSPECTIONS	# SAMPLE EVENTS	# SAMPLE EVENTS	REPORTING FREQUENCY
MA-001 The Akron Plating Co. 1774 Hackberry Street Akron, Ohio 44301	413	1	8	8	2
MA-002 Beringer Plating, Inc. 1211 DeValera Ave. Akron, Ohio 44310	433	1	8	15	2
MA-003 Emerald Performance Materials, LLC 240 W. Emerling Ave. Akron, Ohio 44301	414	1	9	8	2
MA-004 Lockheed Martin MST 1210 Massillon Road Akron, Ohio 44315	433	1	8	8	2
MA-006 Plate-All Metal Co. 1210 DeValera Avenue Akron, Ohio 44310	413 Non-Discharging	1	0	2	2
MA-007 Universal Plating, Inc. 478 Morgan Avenue Akron, Ohio 44311	413 Non-Discharging	1	0	2	2
MA-008 OMNOVA Solutions, Inc. Mogadore Plant 165 S. Cleveland Avenue Mogadore, Ohio 44260	414	1	9	8	2
MA-009 Cornwell Quality Tool Co. 200 N. Cleveland Avenue Mogadore, Ohio 44260	433	1	8	8	2
MA-011 Akron Regional Landfill, Inc. 1585 Hardy Road Akron, Ohio 44313	Local	1	2	8	2
MA-014 Viasystems Technologies, LLC. 7 Ascot Parkway Cuyahoga Falls, Ohio 44223	433	1	8	8	2

# INDUSTRIAL USER INVENTORY AND MONITORING

POTW: City of Akron

PERIOD COVERED: January 1, 2014 to December 31, 2014

FACILITY NAME & ADDRESS		APPLICABLE STANDARDS	POTW IU MONITORING		IU SELF MONITORING	
			# OF INSPECTIONS	# SAMPLE EVENTS	# SAMPLE EVENTS	REPORTING FREQUENCY
MA-015 OMNOVA Solutions, Inc. Akron Plant 1376 Techway Drive Akron, Ohio 44306		414	1	8	8	2
MA-016 Meggitt Aircraft Braking Systems 1204 Massillon Road Akron, Ohio 44315	001	433	1	8	8	2
	002	433		8	12	3
MA-017 H & M Metal Processing 1414 Kenmore Blvd. Akron, Ohio 44314		433	1	7	8	2
MA-018 Heritage Industrial Finishing Kelly Avenue Facility 171 Kelly Avenue Akron, Ohio 44306		433	1	0	2	2
MA-020 Coltene Whaledent 235 Ascot Parkway Cuyahoga Falls, Ohio 44223		433	1	7	15	2
SI-001 Akron Anodizing & Coating Co. A Division of Russell Products 1066 Home Avenue Akron, Ohio 44310		413	1	8	8	2
SI-002 Summa Health Systems Akron City Campus 525 E. Market Street Akron, Ohio 44304		Local	1	4	8	2
SI-003 Akron General Medical Center 400 Wabash Avenue Akron, Ohio 44307		Local	1	4	8	2

# INDUSTRIAL USER INVENTORY AND MONITORING

POTW: City of Akron

PERIOD COVERED: January 1, 2014 to December 31, 2014

FACILITY NAME & ADDRESS		APPLICABLE STANDARDS	POTW IU MONITORING		IU SELF MONITORING	
			# OF INSPECTIONS	# SAMPLE EVENTS	# SAMPLE EVENTS	REPORTING FREQUENCY
SI-004 Akron Paint & Varnish 1390 Firestone Pkwy. Akron, Ohio 44301		Local	1	2	2	2
SI-005 Children's Hospital Medical Center 281 Locust Street Akron, Ohio 44308	001	Local	1	4	8	2
	002	Local		4	8	2
	003	Local		4	8	2
	004	Local		4	8	2
SI-007 GMP Friction Products 130 Elinor Avenue Akron, Ohio 44310		433	1	8	8	2
SI-010 Hayes Lemmerz International, Inc. Akron Operations 428 Seiberling Street Akron, Ohio 44306		Local	1	8	48	12
SI-011 The Goodyear Tire & Rubber Co Plant #5 R & D 1452 E. Archwood Ave Akron, Ohio 44306		Local	1	0	8	2
SI-012 The Hygenic Corp. 1245 Home Avenue Akron, Ohio 44310		Local	1	8	8	2
SI-014 Country Pure Foods, Inc. 681 W. Waterloo Road Akron, Ohio 44314		Local	1	3	12	12
SI-015 Summa Health Systems St. Thomas Campus 444 N. Main Street Akron, Ohio 44310	001	Local	1	4	8	2
	002	Local			8	2
SI-017 Akron Energy Systems, LLC. 226 Opportunity Pkwy. Akron, Ohio 44307		Local	1	8	12	2

# INDUSTRIAL USER INVENTORY AND MONITORING

POTW: City of Akron

PERIOD COVERED: January 1, 2014 to December 31, 2014

FACILITY NAME & ADDRESS		APPLICABLE STANDARDS	POTW IU MONITORING		IU SELF MONITORING	
			# OF INSPECTIONS	# SAMPLE EVENTS	# SAMPLE EVENTS	REPORTING FREQUENCY
SI-020 Ashland Inc. 200 Darrow Road Akron, Ohio 44305		Local	1	3	8	2
SI-021	001	Local	1	4	8	2
	002	Local		4	8	2
SI-025 Georgia Pacific 3265 Gilchrist Rd. Mogadore, Ohio 44260		Local	1	5	8	2
SI-027 Alcon Tool Company 574 Lafollette Street Akron, OH 44311		Local	1	5	8	2
SI-028 Goodyear Tire & Rubber Co., Plant #3, R & D. 1452 E. Archwood Ave. Akron, Ohio 44306	001	Local	1	2	8	2
	002	Local		2	8	2
	003	Local		2	8	2
MI-006 Akron Metal Etching 463 Locust Street Akron, Ohio 44307		413	1	6	8	2
MI-007 Americhem, Inc. 2000 Americhem Way Cuyahoga Falls, Ohio 44221		Local	1	2	8	2
MI-008 Beacon Journal Publishing 44 E. Exchange Street Akron, Ohio 44328		Local	1	0	0	0
MI-009 Chemionics Corp. 390 S. Munroe Falls Rd. Akron, Ohio 44278		Local	1	5	8	2

# INDUSTRIAL USER INVENTORY AND MONITORING

POTW: City of Akron

PERIOD COVERED: January 1, 2014 to December 31, 2014

FACILITY NAME & ADDRESS	APPLICABLE STANDARDS	POTW IU MONITORING		IU SELF MONITORING	
		# OF INSPECTIONS	# SAMPLE EVENTS	# SAMPLE EVENTS	REPORTING FREQUENCY
MI-010 Summit Heat Treating Morgan Avenue Akron, Ohio 44311	Local	1	6	8	2
MI-020 Firestone Polymers, LLC 381 W. Wilbeth Road Akron, Ohio 44301	Local	1	2	2	2
MI-028 The Goodyear Tire & Rubber Co. Goodyear Mix Center 1080 River Street Akron, Ohio 44305	Local	1	4	8	2
MI-035 Heritage Industrial Finishing 1874 Englewood Ave. Akron, Ohio 44312	433	1	6	12	2
MI-077 Tri-County Hard Chrome 181 Potomac Avenue Tallmadge, Ohio 44278	413 Non-Discharging	1	0	2	2
MI-084 Malco Products, Inc. 393 W. Wilbeth Road Akron, Ohio 44301	Local	1	2	8	2
MI-086 Grimco, Inc. 861 E. Tallmadge Ave. Akron, Ohio 44310	465 Non-Discharging	1	0	2	2
MI-087 Integrated Roll Services 1566 Firestone Pkwy. Akron, Ohio 44301	433 Non-Discharging	1	0	2	2
MI-089 Accu-Chrome A Division of Russell Products Co 275 North Forge Street Akron Ohio 44310	Local	1	3	18	12
MI-092 Martin Wheel Co., Inc. 342 West Avenue Tallmadge, Ohio 44278	433	1	8	8	2

# INDUSTRIAL USER INVENTORY AND MONITORING

POTW: City of Akron

PERIOD COVERED: January 1, 2014 to December 31, 2014

FACILITY NAME & ADDRESS	APPLICABLE STANDARDS	POTW IU MONITORING		IU SELF MONITORING	
		# OF INSPECTIONS	# SAMPLE EVENTS	# SAMPLE EVENTS	REPORTING FREQUENCY
MI-097 Akron Foundry Corporation 2728 Wingate Avenue Akron, Ohio 44314	464 <u>Non-Discharging</u> Local	1	6	8	2
MI-098 Americhem, Inc. Steels Corners Facility 155 East Steels Corners Rd. Cuyahoga Falls, Ohio 44224	Local	1	5	8	2
MI-101 Akron Electric, Inc. 1025 Eagon Street Barberton, Ohio 44203	Local	1	3	8	2
MI-102 Weaver Fabricating and Finishing 2144 Manchester Road Akron, Ohio 44314	433 Non-Discharging	1	0	2	2
MI-103 King Model/King Castings 365 Kenmore Blvd. Akron, Ohio 44314	464.15(a) Non-Discharging	1	0	2	2
MI-104 Akron Foundry Co. – Plant # 4 1434 West Waterloo Road Barberton, Ohio 44203	Local	1	1	2	2
MI-106 Auris Noble LLC. – Voris Plant 130 East Voris Street – Unit C Akron, Ohio 44203	421 Subpart X Non-Discharging	2	0	1	1
Total Number of Permitted Industries EOY 2014		53			

# SIGNIFICANT INDUSTRIAL USERS LIST

POTW: **City of Akron**

**December 31, 2014**

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Facility name and address	SIU Code	SIU Criteria	Delist (Y/N)	Reason for delisting
<b>The Akron Plating Company, Inc.</b> 1774 Hackberry Street Akron, Ohio 44301	MA-001	A	N	
<b>Beringer Plating, Inc.</b> 1211 DeValera Avenue Akron, Ohio 44310	MA-002	A	N	
<b>Emerald Performance Materials, LLC.</b> 240 W. Emerling Avenue Akron, Ohio 44301	MA-003	A	N	
<b>Lockheed Martin MST</b> 1210 Massillon Road Akron, Ohio 44315-0001	MA-004	A	N	
<b>The Plate-All Metal Company</b> 1210 DeValera Avenue Akron, Ohio 44310	MA-006	A	N	
<b>Universal Plating, Inc.</b> 478 Morgan Avenue Akron, Ohio 44311-2470	MA-007	A	N	
<b>OMNOVA Solutions, Inc. Mogadore Plant</b> 165 South Cleveland Avenue Mogadore, Ohio 44260-1505	MA-008	A	N	
<b>Cornwell Quality Tool Company</b> 200 N. Cleveland Avenue Mogadore, Ohio 44260-1205	MA-009	A	N	
<b>Akron Regional Landfill, Inc.</b> 1585 Hardy Road Akron, Ohio 44313	MA-011	D	N	
<b>Viasystems Technologies, LLC.</b> 7 Ascot Parkway Cuyahoga Falls, Ohio 44223	MA-014	A	N	
<b>OMNOVA Solutions, Inc.: Akron Plant</b> 1380 Techway Drive Akron, Ohio 44306	MA-015	A	N	
<b>Meggitt Aircraft Braking Systems</b> 1204 Massillon Road Akron, Ohio 44306-4186	MA-016	A	N	

SIU Criteria

A = Categorical industry.

B = Process flow of 25,000 gpd or greater.

C = Process waste stream makes up 5% or more of hydraulic or organic capacity of POTW.

D = Discharge has reasonable potential to violate pretreatment standards.

## SIGNIFICANT INDUSTRIAL USERS LIST

POTW: **City of Akron**

**December 31, 2014**

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Facility name and address	SIU Code	SIU Criteria	Delist (Y/N)	Reason for delisting
<b>H and M Metal Processing Co.</b> 1414 Kenmore Blvd. Akron, Ohio 44301	MA-017	A	N	
<b>Heritage Industrial Finishing, Inc.</b> <b>Kelly Avenue Facility</b> 171 Kelly Avenue Akron, Ohio 44306	MA-018	A	N	
<b>Coletene Whaledent</b> 235 Ascot Parkway Cuyahoga Falls, Ohio 44223 Arthur McNulty	MA-020	A	N	
<b>Akron Anodizing &amp; Coating Company</b> <b>A Division of Russell Products</b> 1066 Home Avenue Akron, Ohio 44310	SI-001	A	N	
<b>Summa Health Systems</b> <b>Akron City Campus</b> 525 E. Market Street Akron, Ohio 44304-1619	SI-002	B	N	
<b>Akron General Medical Center</b> 1 Akron General Avenue Akron, Ohio 44307	SI-003	B	N	
<b>Akron Paint &amp; Varnish, Inc.</b> 1390 Firestone Parkway Akron, Ohio 44301	SI-004	D	N	
<b>Children's Hospital Medical Center of Akron</b> One Perkins Square Akron, Ohio 44308-1062	SI-005	B	N	
<b>GMP Friction Products</b> 130 Elinor Avenue Akron, Ohio 44305	SI-007	A	N	
<b>Hayes Lemmerz International, Inc</b> <b>Akron Operations</b> 428 Seiberling Street Akron, Ohio 44306-3282	SI-010	D	N	
<b>The Goodyear Tire &amp; Rubber Company,</b> <b>Plant #5 R &amp; D</b> 1452 E. Archwood Avenue Akron, Ohio 44306	SI-011	D	N	

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## SIGNIFICANT INDUSTRIAL USERS LIST

POTW: **City of Akron**

**December 31, 2014**

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Facility name and address	SIU Code	SIU Criteria	Delist (Y/N)	Reason for delisting
<b>The Hygenic Corporation</b> 1245 Home Avenue Akron, Ohio 44310	SI-012	D	N	
<b>Country Pure Foods, Inc.</b> 681 W. Waterloo Rd. Akron, Ohio 44314	SI-014	D	N	
<b>Summa Health System St. Thomas Campus</b> 444 North Main Street Akron, Ohio 44310-3110	SI-015	B	N	
<b>Akron Energy Systems, LLC.</b> 226 Opportunity Parkway Akron, Ohio 44307	SI-017	B	N	
<b>Ashland Inc</b> 200 Darrow Road, Akron, Ohio 44305	SI-020	D	N	
<b>Summa Western Reserve Hospital LLC.</b> 1900 23rd Street Cuyahoga Falls, Ohio 44223	SI-021	B	N	
<b>Georgia-Pacific Currugated LLC.</b> 3265 Gilchrist Rd. Mogadore, Ohio 44260	SI-025	B	N	
<b>Alcon Tool Company</b> 565 Lafollette Street Akron, Ohio 44311	SI-027	D	N	
<b>The Goodyear Tire &amp; Rubber Company, Plant #3, R &amp; D</b> 1485 E. Archwood Avenue Akron, Ohio 44306	SI-028	D	N	
<b>Akron Metal Etching Company</b> 463 Locust Street Akron, Ohio 44307	MI-006	A	N	
<b>Americhem, Inc.</b> 2000 Americhem Way Cuyahoga Falls, Ohio 44222-0375	MI-007	D	N	
<b>Beacon Journal Publishing</b> 44 E. Exchange Street Akron, Ohio 44328	MI-008	D	N	

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## SIGNIFICANT INDUSTRIAL USERS LIST

POTW: **City of Akron**

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Facility name and address	SIU Code	SIU Criteria	Delist (Y/N)	Reason for delisting
<b>Chemionics Corp.</b> 390 Munroe Falls Road Tallmadge, Ohio 44278-3399	MI-009	B	N	
<b>Summit Heat Treating Co.</b> 336 Morgan Avenue Akron, Ohio 44311	MI-010	A	N	
<b>Firestone Polymers, LLC.</b> 381 W. Wilbeth Road Akron, Ohio 44301	MI-020	D	N	
<b>The Goodyear Tire &amp; Rubber Goodyear Mix Center</b> 1080 River Street Akron, Ohio 44305	MI-028	B	N	
<b>Heritage Industrial Finishing</b> 1874 Englewood Avenue Akron, Ohio 44312-1095	MI-035	A	N	
<b>Tri-County Hard Chrome</b> 181 Potomac Avenue Tallmadge, Ohio 44278	MI-077	A	N	
<b>Malco Products, Inc.</b> 393 W. Wilbeth Road Akron, Ohio 44301	MI-084	D	N	
<b>Grimco, Inc.</b> 861 E. Tallmadge Avenue Akron, Ohio 44310	MI-086	A	N	
<b>Integrated Roll Services</b> 1566 Firestone Parkway Akron, Ohio 44301	MI-087	A	N	
<b>Accu-Chrome</b> A Division of Russell Products Co 275 North Forge Street Akron Ohio 44310	MI-089	A	N	
<b>The Martin Wheel Corp., Inc.</b> 342 West Avenue Tallmadge, Ohio 44278	MI-092	A	N	

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## SIGNIFICANT INDUSTRIAL USERS LIST

POTW: **City of Akron**

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Facility name and address	SIU Code	SIU Criteria	Delist (Y/N)	Reason for delisting
<b>Akron Foundry Corporation</b> 2728 Wingate Avenue Akron, Ohio 44314	MI-097	A	N	
<b>Americhem, Inc.</b> <b>Steels Corner Facility</b> 155 East Steels Corner Rd. Cuyahoga Falls, Ohio 44224	MI-098	D	N	
<b>Akron Electric, Inc.</b> 1025 Eagon Street Barberton, Ohio 44203-1603	MI-101	D	N	
<b>Weaver Fabricating and Finishing</b> 2144 Manchester Road Akron, Ohio 44314	MI-102	A	N	
<b>King Model</b> <b>King Castings</b> 365 Kenmore Blvd. Akron, Ohio 44314	MI-103	A	N	
<b>Akron Foundry Corporation – Plant #4</b> 1434 West Waterloo Road Barberton, Ohio 44203	MI-104	D	N	
<b>Auris Noble LLC - Voris Plant</b> 130 East Voris Street – Unit C <b>Akron, Ohio 44311</b>	MI-106	D	N	

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INDUSTRIAL PRETREATMENT MODIFICATIONS  
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POTW: **City of Akron**

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MA-001</b> <b>Akron Plating Co., Inc.</b> 1774 Hackberry Akron, Ohio 44301 Jennifer & Julie Ormsby	Electroplating, electropolishing, polishing, hard and decorative chrome plating, zinc, copper, and nickel plating. Copper plating for Meggit Aircraft Braking Systems. Zinc chromate line.	MA	3,000	Scrubber water goes into pretreatment system, and the pretreatment system effluent may contain Cr, CN, Pb, Ni, Zn, Cu. Sanitary goes out separately.	40 CFR 413.14 (b)
<b>MA-002</b> <b>Beringer Plating, Inc.</b> 1211 DeValera Avenue Akron, Ohio 44310 James Beringer, Jr	Electroplating and metal finishing. Includes copper, nickel, zinc, cadmium, zinc phosphate and aluminum chromating. Black oxide line is 35 gallon tank scale.	MA	11,512	Effluent from pretreatment system contains: Cd, Cr, Cu, CN, Pb, Ni, Zn, Fe. PH is controlled between 9.5 to 10.5.	40 CFR 433
<b>MA-003</b> <b>Emerald Performance Materials, LLC.</b> 240 West Emerling Avenue Akron, Ohio 44301 Scott Magee	Manufacturer of synthetic rubber latex, polymers, resins and rubber organic chemicals.	MA	994,800	Acrylonitrile 81,168 lbs., aniline 28,732 lbs., styrene 353 lbs., diphenylamine 9 lbs. (all amounts given in lbs./year) 2013 amounts.	40 CFR 414 OCPSF
<b>MA-004</b> <b>Lockheed Martin MST</b> 1210 Massillon Road Akron, Ohio 44315 Jack H. Nearhoof	Assemble & test circuit boards, chemfilming, aluminum conversion coating, manufacture defense hardware & machining of aluminum and steel.	MA	49,219	Rinses from metal plating, chemical lab, pH, metals.	40 CFR 433.17 PSNS
<b>MA-006</b> <b>Plate-All Metal Co.</b> 1210 DeValera Avenue Akron, Ohio 44310 John Burg	Metal plating, industrial hard chrome of passenger and truck tire molds and related parts.	MA	91	No regulated discharge. Non-contact cooling water and sanitary only.	40 CFR 413 Non-discharging

MA = Major Effects, SI = Significant Effects, MI = Minor Effects

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MA-007</b> <b>Universal Plating, Inc.</b> 478 Morgan Avenue Akron, Ohio 44311 Jeffrey W. Melton	Electroplating & industrial hard chrome, brass, electroless nickel (used in decorative chrome). Job shop. Pieces up to 10,000 #s (5tons). Piecework – manual batch type processing.	MA	100	None. No regulated discharge.	40 CFR 413 Non-discharging
<b>MA-008</b> <b>OMVOVA Solutions, Inc.</b> <b>Mogadore Plant</b> 165 So. Cleveland Avenue Mogadore, Ohio 44260 Frederick M. Burgett	Manufactures carboxylated styrene-butadiene rubber (SBR) latex and coatings, carboxylated styrene-butadiene acrylonitrile (SBA) and styrene acrylic latex.	MA	188,900	Process wastewater, pH VOCs, COD, BOD. IU cleans up to 5 railcars per day on first and second shift.	40 CFR 414 & 428
<b>MA-009</b> <b>Cornwell Quality Tools Co.</b> 200 N. Cleveland Avenue Mogadore, Ohio 44260-1205 Craig Croley	Manufacturer of professional mechanic hand tools.	MA	3,639	Pretreated wastewater from nickel plating, black oxide and vibratory processes.	40 CFR 433.15 PSES.
<b>MA-011</b> <b>Akron Regional Landfill, Inc.</b> 1585 Hardy Road Akron, Ohio 44313 Tim Haaf	Solid waste landfill (Closed).	MA	1,826	The line is to discharge leachate from the landfill.	Landfill
<b>MA-014</b> <b>Viasystems Technologies, LLC.</b> 7 Ascot Parkway Cuyahoga Falls, Ohio 44223 Clyde Earp	Manufacture printed circuit boards.	MA	30,000	Silver (trace amount). Lead, copper and nickel. IU states that there is no chromium or zinc processed at this facility.	40 CFR 433.17

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INDUSTRIAL PRETREATMENT MODIFICATIONS  
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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MA-015</b> <b>OMVOVA Solutions, Inc.</b> <b>Akron Plant</b> 1380 Tech Way Drive Akron, Ohio 44306-2572 Fredrick Burgett	Manufacturer of thermoplastic elastomers, synthetic resin, reinforcing resins, electrical grade resins, paint resins and toner resins.	MA	141,300	OCPSF chemicals, ethylbenzene (impurity in styrene), surfactants, spent coagulants, sodium sulfate, toluene, styrene, 2-EHA (trace amounts), NaOH, aluminum sulfate, butyl acrylate and chloroform.	40 CFR 414.85 OCPSF
<b>MA-016</b> <b>Meggitt Aircraft Braking Systems</b> 1204 Massillon Road Akron, Ohio 44306-4186 Luke Durudogan	MABSC is a manufacturer of aircraft wheels, brakes and carbon brake components. The process includes machining, anodizing, phosphating, painting and sub-assembly.	MA	92,250	Surfactants from degrease and deburring operations. Rinses from plating.	40 CFR 433.17 PSNS
<b>MA-017</b> <b>H and M Metal Processing Co.</b> 1414 Kenmore Blvd. Akron, Ohio 44301 Robert S. McMillen	Carbon nitriding, air heat treating and black oxide.	MA	5,600	Rinse water and cleanup, salts, small amounts of metals from workpeice.	40 CFR 433.17 PSNS
<b>MA-018</b> <b>Heritage Industrial Finishing, Inc.</b> <b>Kelly Avenue Facility</b> 171 Kelly Avenue Akron, Ohio 44306 Nick Pamboukis	Wet spray, powder coating and sandblasting.	MA	2,900	Treated wastewater discharge from pretreatment system contains metals and a pH of 10.	40 CFR 433.17 PSNS

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MA-020</b> <b>Coletene Whaledent</b> 235 Ascot Parkway Cuyahoga Falls, Ohio 44223 Arthur McNulty	Developer and manufacturer of high precision impression and filling materials, drill bits and related items for the dental industry.	MA	2,511	pH range from 6.5 - 10.3 S.U., Lead, Cadmium, Iron, Cobalt, Copper, Nickel, Zinc, Molybdenum <1 ppm.	40 CFR 433.17 PSNS
<b>SI-001</b> <b>Akron Anodizing &amp; Coating Co.</b> 1066 Home Avenue Akron, Ohio 44310 Robert E. Evans	Metal coater, anodizing (electric current) on aluminum, alodining (applying chromate to surface of aluminum), polyurethane spray coating of metal parts (Falholt). Zinc and manganese phosphating on steel.	MA	7,064	Low levels of chromium, zinc, manganese, aluminum, lead, and copper.	40 CFR 413 Subpart D and E
<b>SI-002</b> <b>Summa Health Systems Akron City Campus</b> 525 E. Market Street Akron, Ohio 44309 Jason P. Niehaus	Acute health care facility. Paris Health Care performs laundry services for all Summa Hospitals.	MA	84,194	Labs, laundry, boiler blowdown, dietary (food grease and garbage disposal), conventionals, possible infectious waste, sterilization water, and cooling towers.	Local
<b>SI-003</b> <b>Akron General Medical Center</b> 1 Akron General Avenue Akron, Ohio 44307 Joseph Plavecski	511 bed hospital. AGMC laundry department cleans mop heads and shop rags only. Laundry is outsourced.	MA	134,000	Typical hospital wastes – pH, conventionals. Dry lab packs used for lab work. Radioactive material from excreta. Seven grease traps are located in the facility. Six in the kitchen and one in the basement under the snack shop.	Local
<b>SI-004</b> <b>Akron Paint &amp; Varnish, Inc.</b> 1390 Firestone Parkway Akron, Ohio 44301 Mike Summers	Adhesives for tire ply assembly, solvent based paints, water based paints and adhesives, industrial marking inks, and industrial crayons.	SI	2,025	Clean-up of latex paint batch tanks would contain: latex paint, pigments, BOD, COD, TSS, TDS, color, small traces of alcohol based solvents.	Local

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>SI-005</b> <b>Children's Hospital Medical Center of Akron</b> One Perkins Square Akron, Ohio 44308-1062 Linda Gentile	Pediatrics hospital, regional burn unit, neo-natal intensive care facility and research.	MA	130,869	Typical hospital wastes – pH and conventionals.	Local
<b>SI-007</b> <b>GMP Friction Products</b> 130 Elinor Avenue Akron, Ohio 44305 Tom Chaya	Manufacture copper powder, copper plating on steel, metallurgical laboratory.	MA	14,136	Discharge from both PT systems – pH, Cu, CN, Pb from powder product.	40 CFR 433.15
<b>SI-010</b> <b>Hayes Lemmerz International, Inc. Akron Operations</b> 428 Seiberling Street Akron, Ohio 44306-3282 Derek Hostetter	Manufacture commercial highway rims for trucks, buses, and military vehicles.	MI	39,700	Zn, Ni, pH, conventionals discharged from neutralized alkaline cleaner sump, oil & grease, contact cooling.	Local
<b>SI-011</b> <b>The Goodyear Tire &amp; Rubber Company, Plant #5 R &amp; D</b> 1452 E. Archwood Avenue Akron, Ohio 44306 Eric Castner	Intermittent polymer R & D in rubber and resins by solution or emulsion polymerization. Full time staff reactivated in June 2007.	SI	550	Hexane (PPM), ethylene glycol (rare and intermittently).	Local

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>SI-012</b> <b>The Hygenic Corporation</b> 1245 Home Avenue Akron, Ohio 44310 John Toney	Manufacturer of specialized polymer products for the medical field. Supplies raw material to other manufacturers in the dental field as of 1/97.	SI	38,908	Effluent from pretreatment, contact cooling water from tubing extruders, floor clean-up water, and cleaning of compounding equipment.	Local
<b>SI-014</b> <b>Country Pure Foods, Inc.</b> 681 W. Waterloo Rd. Akron, Ohio 44314 Jim Powers	Processing and packaging of citrus juices and other fruit drinks. Institutional and retail sales.	SI	31,650	Clean-up water contains: pH, BOD, COD, TSS, TDS, alkaline cleaners, and acid cleaners.	Local
<b>SI-015</b> <b>Summa Health Systems</b> <b>St. Thomas Campus</b> 444 North Main Street Akron, Ohio 44310 Jason P. Niehaus	General hospital services rated at 200 beds. Occupancy averages at 130 patients. Specialty services include: Orthopedic surgery, psychiatric unit and regional hand re-attachment center.	MA	39,391	Lab wastes, laundry, boiler blowdown, dietary (food grease and garbage disposal), conventionals, possible infectious waste, sterilization water, and cooling towers.	Local
<b>SI-017</b> <b>Akron Energy Systems, LLC.</b> 226 Opportunity Parkway Akron, Ohio 44307 Marc Divis	Primarily engaged in production and distribution of steam and hot water by use of wood chips, coal, waste oil, natural gas and tire derived fuel (TDF).	SI	35,000	Blowdown, backwash, conventionals, and noncontact cooling (emergency discharge to sanitary sewer if system fails).	Local
<b>SI-020</b> <b>Ashland Inc.</b> 200 Darrow Road Akron, Ohio 44305 James E. Vondracek	No manufacturing or processing. Permit issued for discharge of treated, contaminated groundwater.	SI	15,000	Low levels of residual VOCs after treatment of contaminated groundwater.	Local

MA = Major Effects, SI = Significant Effects, MI = Minor Effects

Form: AR-4

INDUSTRIAL PRETREATMENT MODIFICATIONS  
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POTW: **City of Akron**

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>SI-021</b> <b>Summa Western Reserve Hospital LLC.</b> 1900 23rd Street Cuyahoga Falls, Ohio 44223 Jill N. Hiner	General hospital services with in-house laundry for mop heads and rags only. All laundry equipment has been removed except for two washers and one dryer. All other laundry sent to Paris Laundry Service.	SI	35,605	Boiler blowdown, laundry discharge, cooling water blowdown and formaldehyde.	Local
<b>SI-025</b> <b>Georgia-Pacific Corrugated LLC.</b> 3265 Gilchrist Rd. Mogadore, Ohio 44260-1247 Kevin Conley	Linerboard and medium papers are formed into corrugated board on the corrugating machine using a cornstarch based adhesive. The corrugated board is then printed with water based inks and converted to flattened boxes.	SI	38,250	Starch (BOD), boron (borax), surfactants, pH, water based inks.	Local
<b>SI-027</b> <b>Alcon Tool Company</b> 565 Lafollette Street Akron, Ohio 44311 Charles Rankin	Manufacturer of industrial tooling. Processes for steel include: milling, turning, grinding and heat treating. Aluminum tooling.	SI	4,270	Discharge from burnishers contain heavy metals.	Local
<b>SI-028</b> <b>The Goodyear Tire &amp; Rubber Company, Plant #3, R &amp; D</b> 1485 E. Archwood Avenue Akron, Ohio 44306 Eric Castner	R & D for Polymer Technology - development of new polymers by emulsion and solution polymerization techniques & polymer additives in research laboratories and bench scale.	SI	12,690	Acrylates, Styrene, Butadiene, Isoprene, Cyclohexane, Hexane in ppm, salts (NaCl etc ) in ppm, acids (sulfuric) in ppm, ethylene glycol and propylene glycol (rare and intermittently).	Local

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MI-006</b> <b>Akron Metal Etching Co.</b> 463 Locust Street Akron, Ohio 44307 Lee Eisinger	Chemical etching of designs and patterns into molds for the rubber, plastics, die casting, and specialty products industries (photo etch and ferric chloride etch). Glass bead blasting. Majority of nitric acid dow etching on magnesium plates is subbed out.	MA	300	Effluent from PT has pH, Cd, Cr, Pb, Cu, Ni, Zn. Ajax & Dye nearly eliminated.	40 CFR 413.64(b)
<b>MI-007</b> <b>Americhem, Inc.</b> 2000 Americhem Way Cuyahoga Falls, Ohio 44221 Linda Boyett	IU has converted building to a customer design & development facility and corporate headquarters. Production is at a pilot scale.	MA	2,000	Effluent from pretreatment may contain suspended metals, chromium oxide.	Local
<b>MI-008</b> <b>Beacon Journal Publishing</b> 44 E. Exchange Street Akron, Ohio 44328 Michael Dean	Newspaper publishing.	MI	3,114	Discharges from plate wash (water soluble maintenance oils), plate processors, pretreatment discharge of ink washes.	Local
<b>MI-009</b> <b>Chemionics Corp.</b> 390 Munroe Falls Road Tallmadge, Ohio 44278 Jim Ferguson	Formulate and mix latex and synthetic latex (surgical products) and plastisol (liquid plastic) compounds.	MI	1,400	Cooling water, floor cleaning, steam condensate and descaler.	Local
<b>MI-010</b> <b>Akron Steel Treating, Inc.</b> 336 Morgan Avenue Akron, Ohio 44311 Joe Powell	Commercial heat treating. Steel is treated in salt baths, aluminum is treated in air furnaces. Steel lines are automated. Tempering. Blast cleaning (shot peening).	MA	1,290	Rinse water may contain low levels of nitrates and metals.	Local

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MI-020</b> <b>Firestone Polymers, LLC</b> 381 W. Wilbeth Road Akron, Ohio 44301 Robert Handlos	Research and development in solvent based synthetic rubber and natural latex	MI	6,769	Sodium chloride from softeners, some particles of solid rubber, lab sinks.	Local
<b>MI-028</b> <b>The Goodyear Tire &amp; Rubber, Mix Center</b> 1080 River Street Akron, Ohio 44305 Ellis Jones	Rubber compounding and mixing.	MA	52,250	Calcium stearate, low levels of zinc, silicates, clay fines.	Local
<b>MI-035</b> <b>Heritage Industrial Finishing, Inc.</b> 1874 Englewood Avenue Akron, Ohio 44312-1095 Nick Pamboukis	Use of chromate conversion coating 0.5% (a.k.a. alodining). Zinc phosphating of steel (99.5%).	MA	1,360	Effluent from pretreatment of zinc phosphate and chrome conversion coating lines. Contains zinc, chrome and nickel.	40 CFR 433
<b>MI-077</b> <b>Tri-County Hard Chrome, Inc.</b> 181 Potomac Avenue Tallmadge, Ohio 44278 Scott Parslow	Industrial hard chrome plating of extruder screws and piston rods.	MI	25	No regulated process flow discharge. Sanitary discharge only.	40 CFR 413 Non-discharging
<b>MI-084</b> <b>Malco Products, Inc.</b> 393 W. Wilbeth Road Akron, Ohio 44301 Stuart Glauberman	Blend and package specialty consumer cleaning products (Mr. Clean, Fantastick bleach, Spic & Span, Dawn, Draino, Liquid Plummer, Raid).	MI	1,400	Color, COD, MBAS, TSS, oil and grease, pH.	Local

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MI-086</b> <b>Grimco, Inc.</b> 861 E. Tallmadge Avenue Akron, Ohio 44310 Rob Peters	Manufacture aluminum blanks and reflective signs for highway and traffic control use. Raw aluminum is mechanically leveled and sheared to specifications. Smaller pieces are recoiled and fed to the mini-blanking lines.	MI	375	Very small amount of rinse water from soap cleaning process (smut from aluminum).	40 CFR 465.35 Non-Discharging
<b>MI-087</b> <b>Integrated Roll Services</b> 1566 Firestone Parkway Akron, Ohio 44301 Robert Hiler	Hard chrome plating of cylindrical steel rollers for mechanical presses used in the steel mill industry. IU prepares the surface of the rollers for plating process with grinding and EDT (Electrical Discharge Texturing).	MI	200	No regulated discharge. Sanitary discharge only.	40 CFR 433 Non-Discharging
<b>MI-092</b> <b>The Martin Wheel Co., Inc.</b> 342 West Avenue Tallmadge, Ohio 44278 Thomas Hartmann	Manufacturer of small steel wheels for lawn and garden and light industrial uses. IU assembles wheels with purchased tires and sells the assembled units. IU also warehouses parts, packages tire tubes and foam fills tires.	MA	5,250	Small continuous discharges from cleaner, rinse, and sealer. Batch discharge of 267 gallons from the Hurricane parts washer after oil skimming (monthly).	40 CFR 433.17
<b>MI-097</b> <b>Akron Foundry Corporation</b> 2728 Wingate Avenue Akron, Ohio 44314 Michael Ostich	Aluminum foundry – job shop	MA	2,865	A minor volume of of photo finishing wastewater.	40 CFR 464 Subpart A

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MI-098</b> <b>Americhem, Inc.</b> <b>Steel Corners Facility</b> 155 East Steels Corner Rd. Cuyahoga Falls, Ohio 44224 Linda Boyett	Blends raw color pigments containing metal from compound to obtain a concentrated color dispersion to be used by customers in blends for their final products. Primarily supplies the automotive industry with engineering resins.	SI	12,000	Effluent from the pretreatment system may contain suspended metals, chromium oxide and iron oxide	Local
<b>MI-101</b> <b>Akron Electric, Inc.</b> 1025 Eagon Street Barberton, Ohio 44203-1603 Michael Ostich	Machine and assemble aluminum castings.	SI	1,425	Cr, Cu, Zn, Ni, Oil & grease.	Local
<b>MI-102</b> <b>Weaver Fabricating and Finishing</b> 2144 Manchester Road Akron, Ohio 44314 James Lauer	Steel and aluminum sheets are cut, bent, welded and powder coated. Job shop.	MI	900	No regulated process flow discharge. Sanitary and noncontact cooling discharge only.	40 CFR 433 Non-discharging
<b>MI-103</b> <b>King Model/King Castings</b> 365 Kenmore Blvd. Akron, Ohio 44301 Frank Noffsinger	Manufacturer of machined models and aluminum castings for tire molds.	MI	2,067	Gypsum plaster.	40 CFR 464(a) Non-discharging

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PERMIT ID FACILITY NAME FACILITY ADDRESS AUTHORIZED REPRESENTATIVE	PROCESS DESCRIPTION	LOCAL CLASS	FLOW RATE (GPD)	POLLUTANTS	APPLICABLE STANDARD
<b>MI-104</b> <b>Akron Foundry Company – Plant #4</b> 1434 West Waterloo Road Barberton, Ohio 44203 Michael Ostich	Heat treating, welding, box washer, assembly and shipping of aluminum products manufactured at AFC Plant #1.	MI	1,025	Cu, traces of Pb, Zn, pH, oil & grease.	Local.
<b>MI-106</b> <b>Auris Noble LLC – Voris Plant</b> 130 East Voris St. – Unit C Akron, Ohio 44311 Lou Britton	Melt and assay of high purity precious metals.	MI	170	No regulated discharge. Sanitary discharge only.	40 CFR 421(x) Non-discharging

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Form: AR-4

## GENERAL MONITORING INFORMATION

POTW: City of Akron PERIOD COVERED: January 1, 2014 to December 31, 2014

INDUSTRIAL USER CLASSIFICATION	POTW INDUSTRIAL USER MONITORING		INDUSTRIAL USER SELF MONITORING	
	INSPECTION FREQ	SAMPLING FREQ	SAMPLING FREQ	REPORTING FREQ
<p><i>The following general Compliance Monitoring guidance by the City of Akron was proposed in the Enforcement Management System Submitted to Ohio EPA on October 15, 1990, resubmitted in January 1991 per Ohio EPA comments, and approval by Ohio EPA on May 21, 1991:</i></p>				
Significant Industrial User (SIU)				
Major Effects	Annual	6 days/yr.	2-8 days/yr.	Semi-Annual
Significant Effects	Annual	3 days/yr.	2-8 days/yr.	Semi-Annual
Minor Effects	Annual	2 days/yr.	2-8 days/yr.	Semi-Annual
Nonsignificant Industrial User (NS)	As Needed	As Needed	As Needed	Triennial
<p><i>The Significant Industrial Users will be required to meet the following sampling requirements:</i></p>				
Regulated Pollutants	Discharged	4 samples/semi-annually		
Categorical Regulated Pollutants				
TTO w/TOMP	Not Discharged	1 sample/semi-annually		
TTO wo/TOMP				
		1 sample/5 yrs.		
		1 sample/yr.		
<p><i>Generally, UST remediations require to obtain a permit (more than 6 months duration) will be required to perform the following monitoring</i></p>				
Significant IU UST	Semi-Annual	2 days/yr.	12 days/yr	Monthly



OHIO ENVIRONMENTAL PROTECTION AGENCY  
Division of Water Pollution Control

Pretreatment Priority Pollutant Reporting Form

POTW: Akron Water Reclamation Facility

LABORATORY: Precision Analytical, Inc., 4450 Johnston Pkwy, Cleveland, OH 44128

SAMPLING:

	DATE	TIME
INFLUENT	<u>07/22-07/23/2014</u>	<u>See comments</u>
EFFLUENT	<u>07/22-07/23/2014</u>	<u>See comments</u>
SLUDGE 1	<u>07/23/2014</u>	<u>12:00 (g)</u>
SLUDGE 2		

SAMPLING LOCATION:

INFLUENT	<u>Influent Sampling Station, prior to Bar Screens</u>
EFFLUENT	<u>Plant Effluent Sampling Station – post Chlorination</u>
SLUDGE 1	<u>Compost Facility – belt cake</u>
SLUDGE 2	

TYPE OF SAMPLE: (BE SPECIFIC)

HEAVY METALS

Influent – Flow based Composite (c)  
Effluent – Flow based Composite (c)  
Sludge1 – Grab (g)

ORGANICS

VOLATILES

Influent – Grab (g)  
Effluent – Grab (g)  
Sludge1 – Grab (g)

EXTRACTABLES

Influent – Flow based Composite (c)  
Effluent – Flow based Composite (c)  
Sludge1 – Grab (g)

OTHER

Influent – Grab (g), Effluent – Grab (g), Sludge1 – Grab (g)

PERCENT SLUDGE SOLIDS: SLUDGE 1 28.5 % SLUDGE 2 N/A

COMMENTS: SAMPLE COLLECTION DETAILS  
Influent grab samples: VOC, cyanide and Hg – 7/22 @ 14:00.  
Effluent grab samples: VOC, cyanide and Hg – 7/23 @ 07:00.  
Semi-volatile and metals samples - 24-hr flow composite samples  
initiated as follows. Influent 7/22 @ 06:45 to 7/23 @ 06:45. Effluent 7/22  
@ 07:00 to 7/23 @ 07:00

POTW PRETREATMENT CONTACT:

Frederick A. Neugebauer, P.E., Industrial Pretreatment Engineer  
Name and title (please print)

Frederick A. Neugebauer  
Signature

13 May 2015  
Date

CAS#	POLLUTANT	INFLUENT ug/L	EFFLUENT ug/L	SLUDGE (1) mg/kg dry	SLUDGE (2) mg/kg dry
Heavy Metals (13)					
7440-36-0	Antimony	AA ( 3.15 )	AA ( 3.15 )	3.68 ( 0.288 )	( )
7440-38-2	Arsenic	AA ( 1.98 )	AA ( 1.98 )	8.59 ( 0.665 )	( )
7440-41-7	Beryllium	AA ( 1.2 )	AA ( 1.20 )	AA ( 0.04 )	( )
7440-43-9	Cadmium	AA ( 0.044 )	AA ( 0.044 )	AA ( 0.177 )	( )
7440-47-3	Chromium	2.18 ( 0.112 )	1.28 ( 0.112 )	27.1 ( 0.061 )	( )
7440-50-8	Copper	31.8 ( 5.84 )	AA ( 5.84 )	209 ( 0.369 )	( )
7439-92-1	Lead	1.97 ( 0.174 )	AA ( 0.174 )	46.2 ( 0.164 )	( )
7439-97-6	Mercury	AA ( 0.004 )	AA ( 0.004 )	0.633 ( 0.016 )	( )
7440-02-0	Nickel	AA ( 1.84 )	AA ( 1.84 )	14.3 ( 0.453 )	( )
7782-49-2	Selenium	AA ( 3.56 )	AA ( 3.56 )	AA ( 0.655 )	( )
7440-22-4	Silver	AA ( 1.34 )	AA ( 1.34 )	2.7 ( 0.301 )	( )
7440-28-0	Thallium	AA ( 1.74 )	AA ( 1.74 )	3.4 ( 0.169 )	( )
7440-66-6	Zinc	854 ( 3.72 )	41.3 ( 3.72 )	940 ( 0.301 )	( )

Volatiles (28)		INFLUENT ug/L	EFFLUENT ug/L	SLUDGE (1) mg/kg dry	SLUDGE (2) mg/kg dry
107-02-8	Acrolein	AA ( 21.3 )	AA ( 21.3 )	AA ( 0.51 )	( )
107-13-1	Acrylonitrile	1120 ( 134 )	AA ( 26.8 )	AA ( 0.40 )	( )
71-43-2	Benzene	AA ( 4.01 )	AA ( 4.01 )	AA ( 0.03 )	( )
75-25-2	Bromoform	AA ( 1.00 )	AA ( 1.00 )	AA ( 0.02 )	( )
56-23-5	Carbon tetrachloride	AA ( 3.08 )	AA ( 3.08 )	AA ( 0.03 )	( )
108-90-7	Chlorobenzene	AA ( 1.65 )	AA ( 1.65 )	AA ( 0.03 )	( )
124-48-1	Chlorodibromomethane	AA ( 2.33 )	AA ( 2.33 )	AA ( 0.02 )	( )
75-00-3	Chloroethane	AA ( 6.73 )	AA ( 6.73 )	AA ( 0.03 )	( )
110-75-8	2-Chloroethyl vinyl ether	AA ( 50 )	AA ( 50.0 )	AA ( 0.68 )	( )
67-66-3	Chloroform	6.04 ( 2.83 )	AA ( 2.83 )	AA ( 0.04 )	( )
75-27-4	Dichlorobromomethane	AA ( 1.94 )	AA ( 1.94 )	AA ( 0.02 )	( )
75-34-3	1,1-Dichloroethane	AA ( 5.00 )	AA ( 5.00 )	AA ( 0.04 )	( )
107-06-2	1,2-Dichloroethane	AA ( 4.85 )	AA ( 4.85 )	AA ( 0.03 )	( )
75-35-4	1,1-Dichloroethylene	AA ( 3.00 )	AA ( 3.00 )	AA ( 0.03 )	( )
78-87-5	1,2-Dichloropropane	AA ( 2.83 )	AA ( 2.83 )	AA ( 0.02 )	( )
542-75-6	1,3-Dichloropropylene	AA ( 5.00 )	AA ( 5.00 )	AA ( 0.07 )	( )
100-41-4	Ethyl benzene	AA ( 1.77 )	AA ( 1.77 )	0.092 ( 0.02 )	( )
74-83-9	Methyl bromide	AA ( 5.00 )	AA ( 5.00 )	AA ( 0.06 )	( )
74-87-3	Methyl chloride	12.6 ( 1.59 )	AA ( 1.59 )	AA ( 0.08 )	( )
75-09-2	Methylene chloride	12.6 ( 1.59 )	AA ( 1.59 )	AA ( 0.06 )	( )
79-34-5	1,1,2,2-Tetrachloroethane	AA ( 1.49 )	AA ( 1.49 )	AA ( 0.01 )	( )
127-18-4	Tetrachloroethylene	AA ( 2.75 )	AA ( 2.75 )	AA ( 0.04 )	( )
108-88-3	Toluene	AA ( 2.31 )	AA ( 2.31 )	6.07 ( 0.70 )	( )
156-60-5	1,2-trans-Dichloroethylene	AA ( 6.52 )	AA ( 6.52 )	AA ( 0.03 )	( )
71-55-6	1,1,1-Trichloroethane	AA ( 3.90 )	AA ( 3.90 )	AA ( 0.03 )	( )
79-00-5	1,1,2-Trichloroethane	AA ( 2.84 )	AA ( 2.84 )	AA ( 0.03 )	( )
79-01-6	Trichloroethylene	AA ( 2.50 )	AA ( 2.5 )	AA ( 28.80 )	( )
75-01-4	Vinyl chloride	AA ( 1.95 )	AA ( 1.95 )	AA ( 26.40 )	( )

Base Neutrals (46)		INFLUENT ug/L	EFFLUENT ug/L	SLUDGE (1) mg/kg dry	SLUDGE (2) mg/kg dry
83-32-9	Acenaphthene	AA ( 2.01 )	AA ( 2.01 )	AA ( 7.09 )	( )
208-96-8	Acenaphthylene	AA ( 2.01 )	AA ( 2.01 )	AA ( 7.09 )	( )
120-12-7	Anthracene	AA ( 2.00 )	AA ( 2.00 )	AA ( 4.90 )	( )
92-87-5	Benzidine	AA ( 12.3 )	AA ( 12.3 )	AA ( 27.1 )	( )
56-55-3	Benzo [a] anthracene	AA ( 1.88 )	AA ( 1.88 )	AA ( 4.81 )	( )
50-32-8	Benzo [a] pyrene	AA ( 2.07 )	AA ( 2.07 )	AA ( 4.89 )	( )
205-99-2	3,4-Benzofluoranthene	AA ( 2.63 )	AA ( 2.63 )	AA ( 5.73 )	( )

CAS#	POLLUTANT	Base Neutrals (cont.)			
		INFLUENT ug/L	EFFLUENT ug/L	SLUDGE (1) mg/kg dry	SLUDGE (2) mg/kg dry
191-24-2	Benzo(ghi)perylene	AA ( 2.65 )	AA ( 2.65 )	AA ( 4.59 )	( )
207-08-9	Benzo (k) fluoranthene	AA ( 2.4 )	AA ( 2.40 )	AA ( 5.1 )	( )
111-91-1	Bis(2-chloroethoxy)methane	AA ( 2.78 )	AA ( 2.78 )	AA ( 9.98 )	( )
111-44-4	Bis(2-chloroethyl)ether	AA ( 2.69 )	AA ( 2.69 )	AA ( 13.1 )	( )
108-60-1	Bis(2-chloroisopropyl)ether	AA ( 2.30 )	AA ( 2.30 )	AA ( 13.2 )	( )
117-81-7	Bis(2-ethylhexyl)phthalate	AA ( 2.40 )	AA ( 2.40 )	35.4 ( 4.34 )	( )
101-55-3	4-Bromophenyl phenyl ether	AA ( 2.20 )	AA ( 2.20 )	AA ( 5.41 )	( )
85-68-7	Butyl benzyl phthalate	AA ( 3.65 )	AA ( 3.65 )	AA ( 5.03 )	( )
91-58-7	2-Chloronaphthalene	AA ( 2.82 )	AA ( 2.82 )	AA ( 8.09 )	( )
7005-72-3	4-Chlorophenyl phenyl ether	AA ( 2.41 )	AA ( 2.41 )	AA ( 6.31 )	( )
218-01-9	Chrysene	AA ( 2.09 )	AA ( 2.09 )	AA ( 4.09 )	( )
53-70-3	Dibenzo(a,h)anthracene	AA ( 2.44 )	AA ( 2.44 )	AA ( 4.19 )	( )
95-50-1	1,2-Dichlorobenzene	AA ( 3.27 )	AA ( 3.27 )	AA ( 12.6 )	( )
541-73-1	1,3-Dichlorobenzene	AA ( 3.26 )	AA ( 3.26 )	AA ( 12.7 )	( )
106-46-7	1,4-Dichlorobenzene	AA ( 3.62 )	AA ( 3.62 )	AA ( 12.7 )	( )
91-94-1	3,3'-Dichlorobenzidine	AA ( 5.63 )	AA ( 5.63 )	AA ( 13.7 )	( )
84-66-2	Diethyl phthalate	AA ( 9.36 )	AA ( 9.36 )	AA ( 5.25 )	( )
131-11-3	Dimethyl phthalate	AA ( 6.26 )	AA ( 6.26 )	AA ( 5.83 )	( )
84-74-2	Di-n-butyl phthalate	AA ( 6.43 )	AA ( 6.43 )	AA ( 4.37 )	( )
121-14-2	2,4-Dinitrotoluene	AA ( 2.11 )	AA ( 2.11 )	AA ( 4.70 )	( )
606-20-2	2,6-Dinitrotoluene	AA ( 2.06 )	AA ( 2.06 )	AA ( 6.04 )	( )
117-84-0	Di-n-octyl phthalate	AA ( 2.76 )	AA ( 2.76 )	AA ( 5.94 )	( )
122-66-7	1,2-Diphenylhydrazine	AA ( 1.99 )	AA ( 1.99 )	AA ( 6.57 )	( )
206-44-0	Fluoranthene	AA ( 1.81 )	AA ( 1.81 )	AA ( 4.02 )	( )
86-73-7	Fluorene	AA ( 1.97 )	AA ( 1.97 )	AA ( 6.31 )	( )
118-74-1	Hexachlorobenzene	AA ( 2.97 )	AA ( 2.97 )	AA ( 5.19 )	( )
87-68-3	Hexachlorobutadiene	AA ( 3.06 )	AA ( 3.06 )	AA ( 11.5 )	( )
77-47-4	Hexachlorocyclopentadiene	AA ( 2.40 )	AA ( 2.40 )	AA ( 7.36 )	( )
67-72-1	Hexachloroethane	AA ( 3.74 )	AA ( 3.74 )	AA ( 13.1 )	( )
193-39-5	Indeno (1,2,3-cd) pyrene	AA ( 2.11 )	AA ( 2.11 )	AA ( 4.12 )	( )
78-59-1	Isophorone	AA ( 2.11 )	AA ( 2.11 )	AA ( 8.20 )	( )
91-20-3	Naphthalene	AA ( 2.95 )	AA ( 2.95 )	AA ( 10.6 )	( )
98-95-3	Nitrobenzene	AA ( 2.87 )	AA ( 2.87 )	AA ( 11.8 )	( )
62-75-9	N-nitrosodimethylamine	AA ( 1.29 )	AA ( 1.29 )	AA ( 14.3 )	( )
621-64-7	N-nitrosodi-n-propylamine	AA ( 2.67 )	AA ( 2.67 )	AA ( 10.8 )	( )
86-30-6	N-nitrosodiphenylamine	AA ( 3.97 )	AA ( 3.97 )	AA ( 8.88 )	( )
85-01-8	Phenanthrene	AA ( 1.78 )	AA ( 1.78 )	AA ( 5.20 )	( )
129-00-0	Pyrene	AA ( 2.15 )	AA ( 2.15 )	AA ( 4.93 )	( )
120-82-1	1,2,4-Trichlorobenzene	AA ( 8.10 )	AA ( 8.10 )	AA ( 17.0 )	( )

CAS#	POLLUTANT	Acids (11)			
		INFLUENT ug/L	EFFLUENT ug/L	SLUDGE (1) mg/kg dry	SLUDGE (2) mg/kg dry
95-57-8	2-Chlorophenol	AA ( 2.29 )	AA ( 2.29 )	AA ( 10.8 )	( )
120-83-2	2,4-Dichlorophenol	AA ( 1.84 )	AA ( 1.84 )	AA ( 7.78 )	( )
105-67-9	2,4-Dimethylphenol	AA ( 9.01 )	AA ( 9.01 )	AA ( 9.72 )	( )
534-52-1	4,6-Dinitro-o-cresol	AA ( 1.40 )	AA ( 1.40 )	AA ( 3.73 )	( )
51-28-5	2,4-Dinitrophenol	AA ( 3.50 )	AA ( 3.50 )	AA ( 3.35 )	( )
88-75-5	2-Nitrophenol	AA ( 2.44 )	AA ( 2.44 )	AA ( 9.30 )	( )
100-02-7	4-Nitrophenol	AA ( 1.94 )	AA ( 1.94 )	AA ( 7.30 )	( )
59-50-7	p-Chloro-m-cresol	AA ( 2.31 )	AA ( 2.31 )	AA ( 6.78 )	( )
87-86-5	Pentachlorophenol	AA ( 2.03 )	AA ( 2.03 )	AA ( 3.36 )	( )
108-95-2	Phenol	AA ( 8.24 )	AA ( 8.24 )	AA ( 9.93 )	( )
88-06-2	2,4,6-Trichlorophenol	AA ( 2.08 )	AA ( 2.08 )	AA ( 6.94 )	( )

CAS#	POLLUTANT	INFLUENT ug/L	EFFLUENT ug/L	SLUDGE (1) mg/kg dry	SLUDGE (2) mg/kg dry
Pesticides (26)					
309-00-2	Aldrin	AA ( 0.014 )	AA ( 0.014 )	AA ( 0.0017 )	( )
319-84-6	Alpha-BHC	AA ( 0.015 )	AA ( 0.015 )	AA ( 0.002 )	( )
319-85-7	Beta-BHC	AA ( 0.019 )	AA ( 0.019 )	AA ( 0.018 )	( )
319-86-8	Delta-BHC	AA ( 0.013 )	AA ( 0.013 )	AA ( 0.0026 )	( )
58-89-9	Gamma-BHC	AA ( 0.011 )	AA ( 0.011 )	AA ( 0.0019 )	( )
57-74-9	Chlordane	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.0015 )	( )
50-29-3	4,4-DDT	AA ( 0.014 )	AA ( 0.014 )	AA ( 0.0043 )	( )
72-55-9	4,4-DDE	AA ( 0.018 )	AA ( 0.018 )	AA ( 0.0015 )	( )
72-54-8	4,4-DDD	AA ( 0.016 )	AA ( 0.016 )	AA ( 0.0025 )	( )
60-57-1	Dieldrin	AA ( 0.013 )	AA ( 0.013 )	0.0 ( 0.0017 )	( )
959-98-8	Alpha endosulfan	AA ( 0.015 )	0.0446 ( 0.015 )	AA ( 0.0018 )	( )
33213-65-9	Beta endosulfan	AA ( 0.018 )	0.0751 ( 0.018 )	AA ( 0.0022 )	( )
1031-07-8	Endosulfan sulfate	AA ( 0.012 )	0.052 ( 0.012 )	AA ( 0.0035 )	( )
72-20-8	Endrin	AA ( 0.023 )	0.127 ( 0.023 )	AA ( 0.003 )	( )
7421-93-4	Endrin aldehyde	AA ( 0.022 )	AA ( 0.022 )	AA ( 0.0025 )	( )
7-44-8	Heptachlor	AA ( 0.012 )	AA ( 0.012 )	AA ( 0.0024 )	( )
1024-57-3	Heptachlor epoxide	0.0673 ( 0.014 )	AA ( 0.014 )	AA ( 0.0025 )	( )
53469-21-9	PCB-1242	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.039 )	( )
11097-69-1	PCB-1254	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.038 )	( )
11104-28-2	PCB-1221	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.058 )	( )
11141-16-5	PCB-1232	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.13 )	( )
12672-29-6	PCB-1248	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.043 )	( )
11096-82-5	PCB-1260	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.054 )	( )
12674-11-2	PCB-1016	AA ( 1.25 )	AA ( 1.25 )	0.9 ( 0.133 )	( )
8001-35-2	Toxaphene	AA ( 1.25 )	AA ( 1.25 )	AA ( 0.0015 )	( )
1764-01-6	2,3,7,8-Tetrachloro-dibenzo-p-dioxin	Negative ( screen )	Negative ( screen )	Negative ( screen )	( )
Miscellaneous					
1332-21-4	Asbestos: (1)	( )	( )	( )	( )
	Chrysotile	( )	( )	( )	( )
	Amphibole	( )	( )	( )	( )
57-12-5	Cyanide, Total	AA ( 0.009 )	AA ( 0.009 )	3.5 ( 3.0 )	( )

AW: Sample not logged in; no analysis performed at laboratory.

DATA SUBSTITUTION CODES

AA	Below detectable limit
AB	Analytical data lost
AE	Analytical data not valid - provide explanation
AH	Sample not take - provide explanation
AJ	Above range of sampling equipment
AP	Laboratory accident
AQ	Sample too old to analyze
AR	Headspace in sample
AS	Broken/leaked in transit
AT	Improperly preserved
AV	Insufficient volume
AW	Other - explain

(1) REPORT ONLY IF REQUIRED BY NPDES PERMIT(S), PART II, OTHER REQUIREMENTS.

**PRECISION ANALYTICAL, INC.**

4450 JOHNSTON PARKWAY, UNIT B • CLEVELAND, OH 44128  
 (216) 663-0808 • FAX (216) 663-0656

LABORATORY WORK ORDER #

1407560

Check if same as Report To

REPORT TO: CONTACT & COMPANY: **GIL STADLER - AKRON WRF**  
 ADDRESS: **2460 Akron-Peninsula Rd.** STATE: **OH** ZIP CODE: **44313**  
 CITY: **AKRON** PHONE NO.: **330-375-2963 ext. 724** FAX NO.: **330-375-2966**  
 PROJECT NAME/NUMBER: **PRIORITY POLLUTANTS** QUOTE #: **P1400012**  
 MATRIX: **WW**

Turnaround Time:  Std. Rush:  1 Day  2 Day  3 Day Authorizing signature  
 Special Instructions & QC Requirements (additional charge for QC):  
 TEMP (°C) **5**  
 VISIBILITY (circle) YES NO  
 Sample Disposal (A fee will be assessed if samples are retained longer than 1 month & disposed of by lab)  
 Return To Client  Disposal By Lab  Archive For Months

NO.	CUSTOMER SAMPLE IDENTIFICATION	SAMPLE DATE	SAMPLE TIME	NO. OF CONT.	NO. OF CONT.	MATRIX	ANALYSIS REQUESTED	DRY WEIGHT	YES	NO
1	RAW INFLUENT	7/22/14	0645	1	1	WW	VOC, PCB, SVOC, Metals E200.7, Hg			
2	11	11	0645	1	1	WW				
3	11	11	0645	1	1	WW				
4	11	11	0645	1	1	WW				
5	11	11	1400	2	2	WW				
6	11	11	1400	1	1	WW				
7	RAW DW SAMPLE BLANK	7/22/14	1400	1	1	WW				
8	RAW INFLUENT	7/22/14	1400	1	1	WW				
9										
10										
11										
12										
13										

Relinquished by: (Signature) **Rob Katsmark** Date Time **7/24/14 11:30**  
 Relinquished by: (Signature) **Christina** Date Time **7/24/14 12:40**

\* Same sample for both plant & priority pollutants

# PRECISION ANALYTICAL, INC.

4450 JOHNSTON PARKWAY, UNIT B • CLEVELAND, OH 44128  
 (216) 663-0808 • FAX (216) 663-0656

LABORATORY WORK ORDER #

4055 1407560

Check if same as Report To

REPORT TO: CONTACT & COMPANY GIL STANLEY - AKRON WRF		STATE OH		ZIP CODE 44313											
ADDRESS 2460 AKRON - PENINSULA RD.		STATE		ZIP CODE											
CITY AKRON		PHONE NO.		FAX NO.											
PHONE NO. 330-375-2963 ext. 7124		PROJECT NAME/NUMBER PRIORITY POLLUTANTS		QUOTE # P. P.P.											
EMAIL		TURNAROUND TIME: <input type="checkbox"/> Std. Rush: <input type="checkbox"/> 1 Day <input type="checkbox"/> 2 Day <input type="checkbox"/> 3 Day Authorizing signature		ANALYSIS REQUESTED											
SPECIAL INSTRUCTIONS & QC REQUIREMENTS (additional charge for QC):		TEMP (°C) 5		DRY WEIGHT <input type="checkbox"/> YES <input type="checkbox"/> NO											
Sample Disposal (A fee will be assessed if samples are retained longer than 1 month & disposed of by lab)		VISIBLE (circle) YES NO													
<input type="checkbox"/> Return to Client <input type="checkbox"/> Disposal By Lab <input type="checkbox"/> Archive For Months															
NO.	CUSTOMER SAMPLE IDENTIFICATION	SAMPLE DATE	SAMPLE TIME	NO. OF CONT.	MATRIX	SVOC	PCBS	PCB8	METALS (Cd, Cr, Pb, Hg)	VOC	LL Hg	DATE	TIME		
1	001 EFFLUENT	7/22/14	7AM-7AM	1	WW	<input checked="" type="checkbox"/>	7/24/14	12:58							
2	11			1	WW	<input checked="" type="checkbox"/>									
3	11			1	WW	<input checked="" type="checkbox"/>									
4	11			1	WW	<input checked="" type="checkbox"/>									
5	11	7/23/14	7AM	2	WW	<input checked="" type="checkbox"/>									
6	11			1	WW	<input checked="" type="checkbox"/>									
7	11			1	WW	<input checked="" type="checkbox"/>									
8	001 DW SAMPLE BLANK			1	WW	<input checked="" type="checkbox"/>									
9	<del>001 DW SAMPLE BLANK</del>			1	WW	<input checked="" type="checkbox"/>									
10															
11															
12															
13															
Samplers: (Signature) Bob Katymark		Date 7/24/14 11:30		Received by: (Signature) Chris D. Galt		Date 7/24/14		Time 12:40		Relinquished by: (Signature)		Date 7/24/14		Time 12:40	



## **APPENDIX A**

The City of Akron Sewer Use Code  
Summary of Local Limitations

## **Sewer Use Code**

The City of Akron Sewer Use Code establishing the authority of the Industrial Pretreatment Program to enforce the National Pretreatment Program may be found online at:

[https://library.municode.com/HTML/16028/level3/TIT5PUWO\\_CH50SE\\_ART3SEUSINPRSTWATRCO.html](https://library.municode.com/HTML/16028/level3/TIT5PUWO_CH50SE_ART3SEUSINPRSTWATRCO.html)

# CITY OF AKRON

## WATER RECLAMATION FACILITY

### INDUSTRIAL PRETREATMENT PROGRAM

#### SUMMARY OF LOCAL LIMITATIONS

Ordinance No. 173-1991 amending and/or supplementing Title 5, Chapter 50, of the Code of Ordinances of the City of Akron, Ohio, 1985 to comply with the sewer use requirements of the United States Environmental Protection Agency was passed by Akron City Council on March 4, 1991 and approved by the Mayor on March 7, 1991.

**Section 50.48 Akron requirements. No discharger shall discharge or cause to be discharged into the sewerage system, unless the discharger is defined as an SIU (Significant Industrial User) and issued a wastewater discharge permit by the City which allows the discharge of such pollutants and substances in concentration above the maximum background concentrations.**

#### Average Background Concentrations

<u>Pollutant</u>	<u>Concentration (µg/L)</u>
Arsenic	5.0
Cadmium	5.2
Chromium	8.1
Copper	57.9
Cyanide	10.2
Lead	13.5
Mercury	0.0254
Nickel	5.8
Zinc	240
Ethylbenzene	< 5.0

#### Maximum Background Concentrations

<u>Pollutant</u>	<u>Concentration (µg/L)</u>
Arsenic	10
Cadmium	10
Chromium	10
Copper	120
Cyanide	10
Lead	180
Mercury	0.204
Nickel	28
Zinc	370
Ethylbenzene	< 5.0

**Section 50.48(C) Supplementary limitations. No SIU shall discharge wastewater concentrations and/or mass loadings to the POTW exceeding those limits specified in the discharger's permit issued by the City in accordance with Section 50.52.**

**Section 50.48(D) The Service Director shall evaluate and revise as required permitted and background limits and report his findings to City Council at least annually. Permitted and background limits shall be re-evaluated when new or modified NPDES permit limits for effluents and/or sludges are adopted.**

#### SIU Local Limitations (Permit Limits)

Per three separate Pretreatment Program Modifications approved by Ohio EPA on March 19, 2013, May 28, 2013 and December 13, 2013.

<u>Pollutant</u>	<u>Concentration (mg/L)</u>
Arsenic	0.070
Cadmium	0.020 - 0.50
Chromium	3.00
Copper	3.50
Cyanide	0.49
Lead	1.50
Mercury	BMP
Nickel	3.50
Zinc	3.50
Ethylbenzene	1.30

Permit Status Table  
As of December 31, 2014

Industrial User	Code	Arsenic mg/l	Cadmium mg/l	Chromium mg/l	Copper mg/l	Lead mg/l	Merc mg/l	Nick mg/l	Zinc mg/l	Silver mg/l	T.Cyan mg/l	TTO mg/l	TOMP Date	CWF)CFR...	Regulated Flow gpd		
The Akron Plating Company, Inc.	MA-001		0.090 L	3.00 L	3.50 L	0.60 C		3.50 L	3.50 L		0.49 L	4.57 C	10/1/1996	413 A	5,500		
Beringer Plating, Inc.	MA-002		0.500 L*	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C	9/24/1996	433 A	7,500		
Emerald Performance Materials, LLC	MA-003	001	414.111 priority pollutants regulated mass													414 H&D	433,000
Lockheed Martin MS2 - DSS	MA-004		0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C	11/20/1996	433 A	2,000		
The Plate-All Metal Company	MA-006	non-discharge permit, 413 A													*413 A	0	
Universal Plating, Inc.	MA-007	non-discharge permit, 413 A													413 A	0	
OMNOVA Solutions, Inc.	MA-008	414.111 priority pollutants regulated mass													414 D	243,600	
Cornwell Quality Tool Company	MA-009		0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C	3/12/1997	433	5,000		
Akron Regional Landfill	MA-011					1.50 L		3.50 L	3.50 L						75,000		
DDi Cleveland Corp.	MA-014		0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C		433	115,000		
Eliokem Inc. - Akron Plant	MA-015	414.111 priority pollutants regulated mass													414 D	263,000	
Meggitt Aircraft Braking Systems	MA-016	001	0.090 L	2.67 C	3.25 C	0.66 C		3.50 L	2.49 C	0.41 C	0.49 L	2.03 C		CWF	433	15,750	
		002	0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C			433	500	
H&M Metal Processing Co.	MA-017		0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C		433	2,000		
Heritage Industrial Finishing Kelly Ave Facility	MA-018		0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C		433	5,000		
Akron Anodizing & Coating Company	SI-001		0.090 L	3.00 L	3.50 L	0.60 C		3.50 L	3.50 L		0.49 L	4.57 C	10/7/1996	413 D	6,900		
Summa Health Systems/Akron City Campus	SI-002						BPM L								150,000		
Akron General Medical Center	SI-003						BPM L								140,000		
Akron Paint and Varnish, Inc.	SI-004	ph only														2,000	
Children's Hospital Medical Center of Akron	SI-005	001					BPM L								54,000		
		002					BPM L							40,500			
		003					BPM L							20,250			
		004					BPM L							20,250			
GMP Friction Products	SI-007		0.090 L	2.77 C	3.38 C	0.69 C		3.50 L	2.61 C	0.43 C	0.49 L	2.13 C	10/4/1996	433 A	25,000		
Hayes Lemmerz International, Inc.	SI-010		0.090 L	3.00 L	3.50 L	1.50 L		3.50 L	3.50 L				11/15/1996		10,000		
The Goodyear Tire & Rubber Company, Plant # 5, R&D	SI-011	ph only															
The Hygenic Corporation	SI-012								3.50 L						35,000		
County Pure Foods, Incorporated	SI-014	ph only														28,000	
Summa Health Systems/St. Thomas Campus	SI-015	001					BPM L								100,000		
		002					BPM L										
Akron Thermal, LP	SI-017								3.50 L						450,000		
Ashland Chemical Company, Division of Ashland Oil, Inc	SI-020	locally establish limits based on BAT, volatile organics														30,000	
Cuyahoga Falls General Hospital	SI-021	001					BPM L								55,000		
		002					BPM L								0		
Georgia-Pacific Corporation	SI-025				3.50 L				3.50 L						40,000		
Alcon Tools	SI-027		0.090 L	3.00 L	3.50 L	1.50 L		3.50 L	3.50 L						3,000		

C = Categorical Limit, L = Local Limit, L\* = Pre-Existing Local Limit



## INDUSTRIAL PRETREATMENT PROGRAM

### ANNUAL INSPECTIONS APRIL 2014

MON	TUES	WED	THUR	FRI
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
		AKRON BEACON JOURNAL MI-008 10:00 AM WPC/DWB		
21	22	23	24	25
		AKRON ANODIZING SI-001 10:00 AM WPC/DWB	AKRON PAINT & VARNISH SI-004 10:00 AM DWB/WPC	
28	29	30		
	BERINGER PLATING MA-002 10:00 AM WPC/DWB		FIRESTONE POLYMERS MI-020 10:00 AM DWB/WPC	

### ANNUAL INSPECTIONS MAY 2014

MON	TUES	WED	THUR	FRI
			1	2
5	6	7	8	9
	AMERICHEM MI-007 MI-098 9:00 AM WPC/DWB			
12	13	14	15	16
	EMERALD PERFORMANCE MATERIALS MA-003 9:00 AM WPC/DWB			
19	20	21	22	23
		SUMMA AKRON CITY ST. THOMAS SI-002 SI-015 9:00 AM DWB/WPC	PLATE - ALL PLATING MA-006 10:00 AM WPC/DWB	
26	27	28	29	30
HOLIDAY				

## INDUSTRIAL PRETREATMENT PROGRAM

### ANNUAL INSPECTIONS JUNE 2014

MON	TUES	WED	THUR	FRI
2	3	4	5	6
	AKRON PLATING MA-001 10:00 AM DWB/WPC	CHEMIONICS MI-009 10:00 AM WPC/DWB		
9	10	11	12	13
		INTEGRATED ROLL SERVICES MI-087 10:00 AM DWB/WPC	GMP FRICTION PRODUCTS SI-007 10:00 AM WPC/DWB	
16	17	18	19	20
		LOCKHEED MARTIN MST MA-004 9:00 AM DWB/WPC	AKRON ENERGY SYSTEMS SI-017 10:00 AM WPC/DWB	
23	24	25	26	27
		HYGENIC SI-012 10:00 AM WPC/DWB	HERITAGE INDUSTRIAL FINISHING MI-035 10:00 AM DWB/WPC	
30				

### ANNUAL INSPECTIONS JULY 2014

MON	TUES	WED	THUR	FRI
	1	2	3	4
				HOLIDAY
7	8	9	10	11
	AKRON GENERAL SI-003 10:00 AM DWB/WPC	GOODYEAR T & R MIX CENTER MI-028 10:00 AM WPC/DWB		
14	15	16	17	18
	MARTIN WHEEL MI-092 10:00 AM WPC/DWB	CHILDREN'S HOSPITAL SI-005 9:30 AM DWB/WPC		
21	22	23	24	25
	SHINCOR SILICONES STORM WATER INSPECTION 10AM NON-SIG # 1356 DJJ/WPC/DWB	MEGGITT ABS MA-016 9:00 AM WPC/DWB		
28	29	30	31	
	WEAVER FAB & FINISH MI-102 10:00 AM DWB/WPC	TRI - COUNTY HARD CHROME MI-077 10:00 AM WPC/DWB		

## INDUSTRIAL PRETREATMENT PROGRAM

### ANNUAL INSPECTIONS AUGUST 2014

MON	TUES	WED	THUR	FRI
				1
4	5	6	7	8
	OSBURN STONE COMPANY STORM WATER INSPECTION 10AM	MALCO PRODUCTS MI-084 9:00 AM DWB/WPC	COLETENE/ WHALEDENT MA-020 9:00 AM WPC/DWB	
11	12	13	14	15
	REPUBLIC HAULING SERVICES # 1085 STORM WATER INSPECTION 10AM	VIASYSTEMS MA-014 10:00 AM DWB/WPC	UNIVERSAL PLATING MA-007 10:00 AM WPC/DWB	
18	19	20	21	22
	GOODYEAR T & R PLANT #5 R & D SI-011 10:00 AM WPC/DWB	MAXION WHEELS SI-010 10:00 AM DWB/WPC		
25	26	27	28	29
	ANNACO #1072 STORM WATER INSPECTION 10AM	COUNTRY PURE FOODS SI-014 10:00 AM WPC/DWB		

### ANNUAL INSPECTIONS SEPTEMBER 2014

MON	TUES	WED	THUR	FRI
1	2	3	4	5
HOLIDAY				
8	9	10	11	12
	OMNOVA: AKRON MA-015 9:00 AM DWB/WPC	OMNOVA: MOGADORE MA-008 9:00 AM WPC/DWB		
15	16	17	18	19
	REPUBLIC HAULING #1085 STORM WATER INSPECTION 10AM	FOMO #1607 STORM WATER INSPECTION 10AM	AKRON STEEL TREATING MI-010 10:00 AM DWB/WPC	
22	23	24	25	26
	ALCON TOOL COMPANY SI-027 10:00 AM WPC/DWB	THE RUSCOE COMPANY #1734 STORM WATER INSPECTION 10AM		
29	30	01-Oct	02-Oct	
		KING MODEL/ KING CASTINGS MI-103 10:00 AM WPC/DWB	AKRON REGIONAL LANDFILL MA-011 10:00 AM DWB/WPC	

## INDUSTRIAL PRETREATMENT PROGRAM

### ANNUAL INSPECTIONS OCTOBER 2014

MON	TUES	WED	THUR	FRI
		1	2	3
			AKRON REGIONAL LANDFILL MA-011 10:00 AM DWB/WPC	
6	7	8	9	10
		GOODYEAR T & R PLANT # 3 SI-028 10:00 AM WPC/DWB	GEORGIA - PACIFIC SI-025 10:00 AM DWB/WPC	
13	14	15	16	17
HOLIDAY		CORNWELL QUALITY TOOLS MA-009 10:00 AM WPC/DWB	ASHLAND SI-020 10:00 AM DWB/WPC	
20	21	22	23	24
		KING MODEL KING CASTINGS MI-103 10:00 AM WPC/DWB	H & M METAL MA-017 10:00 AM DWB/WPC	
27	28	29	30	31
	AKRON FOUNDRY MI-097 10:00 AM WPC/DWB	AKRON ELECTRIC AKRON FOUNDRY MI-101 MI-104 10:00 AM DWB/WPC		

### ANNUAL INSPECTIONS NOVEMBER 2014

MON	TUES	WED	THUR	FRI
3	4	5	6	7
			WESTRN RESERVE HOSPITAL SI-021 10:00 AM WPC/DWB	
10	11	12	13	14
	HOLIDAY			
17	18	19	20	21
		HERITAGE KELLY AVE MA-018 10:00 AM DWB/WPC	GRIMCO MI-086 10:00 WPC/DWB	
24	25	26	27	28
			HOLIDAY	HOLIDAY

# INDUSTRIAL PRETREATMENT PROGRAM

## ANNUAL INSPECTIONS DECEMBER 2014

MON	TUES	WED	THUR	FRI
1	2	3	4	5
			AKRON METAL ETCHING MI-006 10:00 AM WPC/DWB	
8	9	10	11	12
15	16	17	18	19
22	23	24	25	26
			HOLIDAY	
29	30	31		

## **D. 2014 Review of Nonsignificant Industries**

### **1. Introduction**

The purpose of the 2014 review was to classify new industrial users. The review is also used to determine whether any facilities have closed or moved. In 2014 some of the procedures were revised due to time constraints.

### **2. Planning and Development**

Sources used to find new industries were the 2014 Akron telephone book, Polk's directory, and new water user accounts. In addition IPS personnel made a point to observe any new industrial activity when out in the field. Nonsignificant industries were also found through spill and odor complaints.

From this process, twenty-eight (28) new industries were mailed the Wastewater Discharge Disclosure Declaration Short Form (WDDD-SF). The WDDD-SF is a brief questionnaire about industrial processes and waste discharges.

### **3. Review of Active Industries**

#### **WDDD-SF Mailing**

Mailing occurred throughout 2014 at random. The first mailings gave the facility nine days to complete the WDDD-SF. If this time has elapsed and the form has not been returned, a second mailing occurs followed by an investigation. Investigations are done by a facility inspection or by telephone.

#### **Industrial Site Visits**

Additional Information may be needed from industries. This can be obtained during a site visit. Site visits can be scheduled for; possible discharge of pollutants, large water consumption, possible federal pretreatment regulated industry, did not report enough information, and failure to complete the WDDD-SF. These visits include an interview with a contact person, followed by a facility inspection. The inspection focuses on industrial processes, discharge areas, chemical storage, and floor drains.

## **Classification of Industries**

The final phase of a nonsignificant industrial review is to determine if a facility should be classified as a significant or nonsignificant industry. Criteria for classification is whether an industry discharges small quantities of pollutants, discharges only sanitary sewage, non-discharger, or discharges small amounts of process wastewater.

### **4. Review of Closed Industries**

Industries that are closed are examined during a review. This involves checking the Akron telephone book and the Polk directory to verify that the facility is not in operation. A site inspection is conducted and if the building is vacant, the status will be closed.

### **5. Post-Review Activities**

All industries classified in the 2014 review will have files maintained. The file will contain a WDDD-SF, with any reports on site visits, field investigations, on any past information.

### **6. The Final Breakdown of the Industries Reviewed in 2014**

Nonsignificant	213
Out of Business	28
Closed	8
Moved	3
Not in Service Area	0
Unclassified	2

### **The following is a list of categories and their definitions.**

**Nonsignificant** - A Company whose activities do not warrant a discharge permit.

**Out of Business** - A Company that moved or closed and the building is occupied by another business.

**Closed** - A company that moved or closed and the building is vacant.

**Moved** - A company that has moved to another location in the service area.

**Not in Service Area** - A company that is not in the sewer service area.

**Unclassified** - A company that has no industrial significance such an office.

**NONSIGNIFICANT INDUSTRIES REVIEWED IN 2014**

<b>NSID</b>	<b>MAILING_ADDRESS</b>	<b>COMPANY_NAME</b>	<b>CITY</b>	<b>SURVEY YEAR</b>	<b>INSPECT</b>	<b>CHECK</b>	<b>STATUS</b>
1002	297 Ascot Pkwy.	Arch Aluminum and Glass	Cuyahoga Falls	2014	Yes	Yes	Out of Business
1003	1565 Massillon Road	Base Properties, LLC	Akron	2014	No	Yes	Nonsignificant
1007	1145 Highbrook Street	Saalfeld Square Properties, Inc.	Akron	2014	No	Yes	Nonsignificant
1013	4688 Danforth Reserve	Ace Plastics	Stow	2014	No	Yes	Nonsignificant
1015	100 Beech Street	Ace Rubber Products	Akron	2014	No	Yes	Nonsignificant
1019	383 Stanton Avenue	Testique Inc.	Akron	2014	Yes	Yes	Closed
1024	255 Fountain Street	Akrochem Corp.	Akron	2014	No	Yes	Nonsignificant
1028	1169 West Waterloo Road	Akron Canton Commercial Equipment Service Center	Akron	2014	No	Yes	Nonsignificant
1030	313 West North Street	Appliance Mart	Akron	2014	Yes	Yes	Closed
1032	1560 Triplett Boulevard	Akron Coca Cola Bottling Company	Akron	2014	No	Yes	Nonsignificant
1039	633 East Exchange Street	Dunagan Properties, LLC	Akron	2014	No	Yes	Nonsignificant
1040	445 Northeast Ave.	Akron Gasket and Packing Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1045	3518 State Rd.	Akron Porcelainize Company	Cuyahoga Falls	2014	Yes	Yes	Out of Business
1047	809 West Waterloo Road	Akron Rebar Company	Akron	2014	No	Yes	Nonsignificant
1049	2887 Gilchrist Road	Akron Rubber Development Laboratory Inc.	Akron	2014	No	Yes	Nonsignificant
1050	300 Kenmore Boulevard	Akron Rubber Development Laboratory Inc.	Akron	2014	Yes	Yes	Nonsignificant
1052	225 West Bartges Street	Digital Color Imaging International	Akron	2014	No	Yes	Nonsignificant
1053	2740 Cory Avenue	Akron Special Machinery	Akron	2014	No	Yes	Nonsignificant
1057	96 East Miller Road	Akron Tool and Die Company	Akron	2014	No	Yes	Nonsignificant
1067	99 South Seiberling Street	American Beryllium Corp.	Akron	2014	Yes	Yes	Out of Business
1068	1246 Princeton St.	American Utility Processing, L.L.C.	Akron	2014	No	Yes	Nonsignificant
1072	943 Hazel Street	Metalico Annaco	Akron	2014	Yes	Yes	Nonsignificant
1077	1640 East Market Street	Atlas Body Inc.	Akron	2014	No	Yes	Nonsignificant

NSID	MAILING_ADDRESS	COMPANY_NAME	CITY	SURVEY_YEAR	INSPECT	CHECK	STATUS
1078	130 East Voris Street Unit A	SAF, Inc.	Akron	2014	Yes	Yes	Nonsignificant
1085	964 Hazel Street	Republic Services of Ohio Hauling LLC	Akron	2014	No	Yes	Nonsignificant
1088	1742 2nd Street	SK Screenprinting and Lettering, Inc.	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1093	44 East South Street	Burt Mfg.	Akron	2014	No	Yes	Nonsignificant
1101	466 Commerce Street	Deeter Electronics	Tallmadge	2014	No	Yes	Nonsignificant
1102	1270 S. Cleveland- Massillon Rd.	Chemical Associates of Illinois, Inc.	Copley	2014	No	Yes	Nonsignificant
1107	611 West Wilbeth Road	City Scrap and Salvage Company	Akron	2014	Yes	Yes	Nonsignificant
1108	409 S. Munroe Falls Rd.	CLS Finishing Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1109	876 South Arlington Street	Cole's Garage	Akron	2014	Yes	Yes	Nonsignificant
1113	924 Home Avenue	Costa Machine Inc.	Akron	2014	No	Yes	Nonsignificant
1127	1029 Arlington Circle	D and L Machine Company	Akron	2014	No	Yes	Nonsignificant
1128	2740 Hudson Drive Suite C	DA-Stirling Inc.	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1129	1938 South Arlington Road	Desenco Inc.	Akron	2014	Yes	Yes	Nonsignificant
1133	3200 Gilchrist Road	Rubbermaid	Mogadore	2014	No	Yes	Nonsignificant
1138	320 Springside Dr., Ste 320	Dominion East Ohio Gas Company	Akron	2014	Yes	Yes	Nonsignificant
1141	2802 Albrecht Avenue	Ellet Radiator Service Inc.	Akron	2014	No	Yes	Nonsignificant
1156	1416 Piedmont Avenue	Falls Tool and Die, Inc.	Akron	2014	No	Yes	Nonsignificant
1159	1725 East Market Street	Feeney/McIntyre Tire Company	Akron	2014	No	Yes	Nonsignificant
1161	154 Potomac Avenue Unit A	Flexovit USA Inc.	Tallmadge	2014	Yes	Yes	Out of Business
1164	225 Seiberling Street	Frank May Garage	Akron	2014	No	Yes	Nonsignificant
1166	1970 Englewood Avenue	Fred Marvin and Associates	Akron	2014	Yes	Yes	Out of Business
1169	1064 Grant Street	Klein Real Estate Partnership	Akron	2014	Yes	Yes	Out of Business
1174	484 East Waterloo Road	Giant Eagle #4124	Akron	2014	No	Yes	Nonsignificant
1187	1621 East Market Street	Haller Enterprises Inc. (Serv-Ice)	Akron	2014	No	Yes	Nonsignificant
1195	161 Brittain Road	Touma Marwan	Akron	2014	Yes	Yes	Out of Business

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1198	473 South High Street	Horning Wright Company	Akron	2014	Yes	Yes	Out of Business
1200	101 Fulmar Avenue	Hudacsek Tool and Die Inc.	Akron	2014	Yes	Yes	Out of Business
1201	950 Grant Street	Hunnel Electric Company	Akron	2014	No	Yes	Nonsignificant
1203	1503 Exeter Road	Imperial Electric	Akron	2014	No	Yes	Nonsignificant
1208	2000 Manchester Road	Injection Mold and Machine Company	Akron	2014	No	Yes	Nonsignificant
1217	917 East Tallmadge Avenue	Buckeye Car Wash	Akron	2014	Yes	Yes	Closed
1219	1007 Bank Street	Karder Machine Company	Akron	2014	Yes	Yes	Closed
1220	258 Kenmore Boulevard	Karder Rubber Machine and Engineering	Akron	2014	Yes	Yes	Nonsignificant
1223	724 South Arlington Street	Bell & Blaire LLC	Akron	2014	Yes	Yes	Out of Business
1228	365 West Thornton Street	King Sign Company	Akron	2014	No	Yes	Nonsignificant
1230	1207 Sweitzer Avenue	Knapp Foundry Company	Akron	2014	No	Yes	Nonsignificant
1238	1405 Home Avenue	Logan Machine Company	Akron	2014	No	Yes	Nonsignificant
1248	1056 Home Avenue	Bramon Engler Properties	Akron	2014	No	Yes	Nonsignificant
1251	218 South Thomas Road	Apec Automotive Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1252	160 North Union Street	Markham Machine Company	Akron	2014	No	Yes	Nonsignificant
1261	382 Commerce Street	Avtek International Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1268	409 Munroe Falls Rd.	N. C. Chassis Co.	Akron	2014	No	Yes	Nonsignificant
1273	258 Kenmore Boulevard	Newsome and Work Metallizing Company	Akron	2014	No	Yes	Nonsignificant
1276	363 Northeast Avenue	A. Finkl and Son Co.	Tallmadge	2014	No	Yes	Nonsignificant
1277	448 North Howard Street	North Hill Marble and Granite	Akron	2014	Yes	Yes	Unclassified
1278	415 Munroe Falls Road	Northeast Coatings Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1285	1856 South Main Street	Ohio Mechanical Handling Company	Akron	2014	No	Yes	Nonsignificant
1291	2776 Albrecht Avenue	Forestal Plastics	Akron	2014	Yes	Yes	Out of Business
1296	1363 Triplett Boulevard	Pioneer Tool & Die Company	Akron	2014	Yes	Yes	Nonsignificant
1302	2828 2nd Street	Polymerics Inc.	Cuyahoga Falls	2014	No	Yes	Nonsignificant

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1306	925 South Main Street	Praxair Distribution	Akron	2014	No	Yes	Nonsignificant
1307	899 Moe Drive	Chapel Hill Business Center	Akron	2014	Yes	Yes	Out of Business
1311	300 Massillon Road	Progressive Mfg. Co., Inc.	Akron	2014	No	Yes	Nonsignificant
1312	1139 Brittain Road	Progressive Stamping and Fabrication Inc.	Akron	2014	No	Yes	Nonsignificant
1319	585 Massillon Road	Radial Grinding	Akron	2014	No	Yes	Nonsignificant
1321	1833 East Market Street	RCA Rubber	Akron	2014	Yes	Yes	Nonsignificant
1327	1668 State Road	Rick Zaidan Photography	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1330	1077 Gorge Boulevard	Summa Health System	Akron	2014	No	Yes	Nonsignificant
1333	903 East Tallmadge Avenue	Rorhich Corp.	Akron	2014	Yes	Yes	Out of Business
1340	1135 W. Portage Trail Ext.	R.P.C. Rubber Polymer Corp.	Akron	2014	No	Yes	Nonsignificant
1348	929 Kling Street	Service Iron and Steel Company	Akron	2014	Yes	Yes	Closed
1361	307 Munroe Falls Avenue	Smith Truck Cranes	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1365	125 North Union Street	Star Printing Company	Akron	2014	No	Yes	Nonsignificant
1380	2783 Gilchrist Rd.	Tallmadge Spinning and Metal Co.	Tallmadge	2014	No	Yes	Nonsignificant
1383	461 Commerce Street	Northeast Properties, LLC	Tallmadge	2014	No	Yes	Nonsignificant
1384	70 Marc Drive	Technicote	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1386	1355 Evans Avenue	Thermo-Rite Manufacturing	Akron	2014	No	Yes	Nonsignificant
1389	540 South Main Street Suite 214	Towpath Printing Company	Akron	2014	Yes	Yes	Out of Business
1390	1081 Rosemary Boulevard	Koki Laboratories	Akron	2014	No	Yes	Nonsignificant
1395	520 South Main Street, Suite 2502	Canal 17, LLC	Akron	2014	Yes	Yes	Nonsignificant
1400	2587 South Arlington Street	Universal Plastics	Akron	2014	Yes	Yes	Out of Business
1402	165 Northeast Avenue	Universal Rubber and Plastics Corp.	Tallmadge	2014	No	Yes	Nonsignificant
1403	323 North Arlington Street	323 North Arlington, LLC	Akron	2014	Yes	Yes	Closed
1406	36 College St.	University of Akron - Administrative Services Building	Akron	2014	No	Yes	Nonsignificant

NSID	MAILING_ADDRESS	COMPANY_NAME	CITY	SURVEY_YEAR	INSPECT	CHECK	STATUS
1407	225 E. Mill St.	University of Akron - Akron Polymer Training Center	Akron	2014	No	Yes	Nonsignificant
1408	244 Sumner St.	University of Akron - Auburn Science & Engineering Center	Akron	2014	No	Yes	Nonsignificant
1410	354 E. Market St.	University of Akron - Ballet Center	Akron	2014	No	Yes	Nonsignificant
1411	465 Burning Tree Dr.	University of Akron - Presidents Residence	Akron	2014	No	Yes	Nonsignificant
1412	310 Union St.	University of Akron - Jackson Field House	Akron	2014	No	Yes	Nonsignificant
1413	433 Kling St.	University of Akron - Buchtel Field House	Akron	2014	No	Yes	Nonsignificant
1415	220 Wolf Ledges Pkwy.	University of Akron - Buckingham Continuing Education	Akron	2014	No	Yes	Nonsignificant
1418	259 So. Broadway St.	University of Akron - College of Business Administration	Akron	2014	No	Yes	Nonsignificant
1419	185 Carroll St.	University of Akron - Computer Center	Akron	2014	No	Yes	Nonsignificant
1421	108 Fir Hill St.	University of Akron - Child Care Development	Akron	2014	No	Yes	Nonsignificant
1422	198 Hill St.	University of Akron - E. J. Thomas	Akron	2014	No	Yes	Nonsignificant
1424	150 E. Exchange St.	University of Akron - Folk Hall	Akron	2014	No	Yes	Nonsignificant
1425	200 E. Exchange St.	University of Akron - Galluci Hall	Akron	2014	No	Yes	Nonsignificant
1426	382 Carroll St.	University of Akron - Student Recreation and Wellness Center	Akron	2014	No	Yes	Nonsignificant
1427	170 University Ave.	University of Akron - Goodyear Polymer Science Building	Akron	2014	No	Yes	Nonsignificant
1428	216 So. Forge St.	University of Akron - Grounds Maintenance	Akron	2014	No	Yes	Nonsignificant
1429	157 University Ave.	University of Akron - Guzzetta Hall	Akron	2014	No	Yes	Nonsignificant
1430	180 Buchtel Common	University of Akron - Haz-Mat Storage Building	Akron	2014	No	Yes	Nonsignificant
1431	800 George Washington Blvd.	University of Akron - Heisman Lodge	Akron	2014	No	Yes	Nonsignificant
1432	60 Fir Hill St.	University of Akron - Hower House	Akron	2014	No	Yes	Nonsignificant
1434	373 Carroll St.	University of Akron - James A. Rhodes Arena	Akron	2014	No	Yes	Nonsignificant

NSID	MAILING_ADDRESS	COMPANY_NAME	CITY	SURVEY_YEAR	INSPECT	CHECK	STATUS
1435	190 Buchtel Common	University of Akron - Knight Chemical Laboratory	Akron	2014	No	Yes	Nonsignificant
1436	328 Buchtel Common	University of Akron - Kolbe Hall	Akron	2014	No	Yes	Nonsignificant
1437	150 University Ave.	University of Akron - McDowell Law Center	Akron	2014	No	Yes	Nonsignificant
1439	100 Lincoln St.	University of Akron - Lincoln Building	Akron	2014	No	Yes	Nonsignificant
1440	146 Fir Hill St.	University of Akron - Paul Martin University Club	Akron	2014	No	Yes	Nonsignificant
1442	327 Carroll St.	University of Akron - Memorial Hall	Akron	2014	No	Yes	Nonsignificant
1444	361 Buchtel Common	University of Akron - Olin Hall	Akron	2014	No	Yes	Nonsignificant
1445	260 So. Forge St.	University of Akron - Olson Research	Akron	2014	No	Yes	Nonsignificant
1447	146 Hill St.	University of Akron - General Campus - POFC	Akron	2014	No	Yes	Nonsignificant
1448	225 So. Main St.	University of Akron - Polsky Building	Akron	2014	No	Yes	Nonsignificant
1449	150-156 University Ave.	University of Akron - General Grounds	Akron	2014	No	Yes	Nonsignificant
1450	190 E. Buchtel Ave.	University of Akron - Robertson Dining Hall	Akron	2014	No	Yes	Nonsignificant
1451	800 George Washington Blvd.	University of Akron - Rubber Bowl Stadium	Akron	2014	No	Yes	Nonsignificant
1452	222 Carroll St.	University of Akron - Shrank Hall South	Akron	2014	No	Yes	Nonsignificant
1456	303 Carroll St.	University of Akron - Student Union Building	Akron	2014	No	Yes	Nonsignificant
1457	200 Buchtel Common	University of Akron - Whitby Hall	Akron	2014	No	Yes	Nonsignificant
1459	1595 Southeast Avenue	CITGO Petroleum Corp.	Tallmadge	2014	No	Yes	Nonsignificant
1460	4950 Hudson Drive	Philpott Industrial Plastics Enterprises	Stow	2014	No	Yes	Nonsignificant
1464	415 Kennedy Road	R & R Cerrito Enterprises, Inc.	Akron	2014	No	Yes	Nonsignificant
1469	1944 Akron-Peninsula Road	W and W Manufacturing	Akron	2014	Yes	Yes	Moved
1470	140 North Summit Street	W.C. Jenkin Company	Akron	2014	Yes	Yes	Out of Business
1471	2477 Mogadore Road	2477 Mogadore Rd LLC	Akron	2014	No	Yes	Nonsignificant
1472	834 West Market Street	Walgreen's #3278	Akron	2014	No	Yes	Nonsignificant

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1473	830 Brittain Road	Walgreen's #5904	Akron	2014	No	Yes	Nonsignificant
1483	1458 Copley Road	Gajkowski Matthew R.	Akron	2014	Yes	Yes	Unclassified
1487	210 Southwest Avenue	Jordan Todd A. & Kathy M.	Tallmadge	2014	No	Yes	Nonsignificant
1488	182 Beaver Street	Beaver St. Investments. fka (World Metals Inc.)	Akron	2014	Yes	Yes	Out of Business
1495	205 West Ave.	Giant Eagle #4030	Akron	2014	No	Yes	Nonsignificant
1496	75 Graham Road	Giant Eagle #4022	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1497	2775 W. Market St.	Giant Eagle #4025	Fairlawn	2014	No	Yes	Nonsignificant
1498	747 Hollibaugh Ave.	Kone Elevator	Akron	2014	Yes	Yes	Closed
1500	53 S. Maple St.	Burns Kirbie F.	Akron	2014	Yes	Yes	Closed
1512	501 Morgan Ave.	Akron Gear & Engineering	Akron	2014	No	Yes	Nonsignificant
1520	233 S. Thomas Rd.	Heyden Mold & Bench Co. Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1523	955 Home Ave.	M & B Fruit Juice Products Co., Inc.	Akron	2014	No	Yes	Nonsignificant
1525	704 E. Glenwood Ave.	Russo Nunziata	Akron	2014	Yes	Yes	Out of Business
1527	924 E Tallmadge Unit B	TNT Bootcamp	Akron	2014	Yes	Yes	Out of Business
1536	3009 Gilchrist Road	Insite Gilchrist, LLC	Akron	2014	Yes	Yes	Out of Business
1541	484 Tacoma Avenue	Horton Manufacturing Co.	Tallmadge	2014	Yes	Yes	Out of Business
1542	121 Northeast Ave.	Marik Spring Inc.	Tallmadge	2014	No	Yes	Nonsignificant
1548	1350 Home Avenue	Envirocote Inc.	Akron	2014	Yes	Yes	Out of Business
1549	655 West Wilbeth Rd.	Magnum Commercial Realty	Akron	2014	Yes	Yes	Moved
1559	1920 Englewood Ave.	Skylar Shipping, Inc.	Akron	2014	Yes	Yes	Out of Business
1567	1816 Front St.	Accurate Plastics, LLC	Cuyahoga Falls	2014	Yes	Yes	Moved
1575	2391 Triplett Blvd.	First Choice Pro Cleaners	Akron	2014	No	Yes	Nonsignificant
1579	790 East Tallmadge Avenue	A. Schulman, Inc.	Akron	2014	No	Yes	Nonsignificant
1582	918 Hazel Street	Precision Plating Company	Akron	2014	Yes	Yes	Out of Business
1590	1480 Industrial Pkwy.	Herbert USA	Akron	2014	No	Yes	Nonsignificant
1594	2337 Romig Rd. Suite 2	Weaver - Securshread	Akron	2014	No	Yes	Nonsignificant
1600	2915 Mogadore Rd.	Brown's Eastside Auto Recycling	Akron	2014	Yes	Yes	Nonsignificant

NSID	MAILING_ADDRESS	COMPANY_NAME	CITY	SURVEY_YEAR	INSPECT	CHECK	STATUS
1601	66 W. Waterloo Rd.	Bumper to Bumper Auto Recyclers	Akron	2014	Yes	Yes	Nonsignificant
1602	566 Kenmore Blvd.	Lakes Auto Recycling	Akron	2014	Yes	Yes	Nonsignificant
1607	2775 Barber Rd.	Fomo Products	Norton	2014	Yes	Yes	Nonsignificant
1610	138 Fir Hill St	University of Akron - Alumni Building	Akron	2014	No	Yes	Nonsignificant
1611	290 E. Buchtel Ave	University of Akron - Arts and Sciences	Akron	2014	No	Yes	Nonsignificant
1612	32 S. College St	University of Akron - Superior Building	Akron	2014	No	Yes	Nonsignificant
1613	277 So. Broadway St.	University of Akron - Broadway Building	Akron	2014	No	Yes	Nonsignificant
1614	120 E. Mill St.	University of Akron - Quaker Square	Akron	2014	No	Yes	Nonsignificant
1615	464 E. Buchtel Ave.	University of Akron - East Campus Parking Deck	Akron	2014	No	Yes	Nonsignificant
1616	135 Broadway St.	University of Akron - Quaker Square	Akron	2014	No	Yes	Nonsignificant
1617	207 E. Exchange St.	University of Akron - E. Exchange St. Parking Deck	Akron	2014	No	Yes	Nonsignificant
1618	27 So. Forge St.	University of Akron - Chima Family Building	Akron	2014	No	Yes	Nonsignificant
1619	282 Torrey St.	University of Akron - Garson Residence Hall	Akron	2014	No	Yes	Nonsignificant
1620	151 Wheeler St.	University of Akron - Grant High Rise	Akron	2014	No	Yes	Nonsignificant
1621	188 So. College St.	University of Akron - Honors Complex	Akron	2014	No	Yes	Nonsignificant
1622	224 Wolf Ledges Pkwy.	University of Akron - Gas Turbine Testing Facility	Akron	2014	No	Yes	Nonsignificant
1623	227 E. Buchtel Ave.	University of Akron - Lot 27 (Parking)	Akron	2014	No	Yes	Nonsignificant
1624	255 E. Buchtel Ave.	University of Akron - North Campus Parking Deck	Akron	2014	No	Yes	Nonsignificant
1625	402 Carroll St.	University of Akron - Ocasek Natatorium	Akron	2014	No	Yes	Nonsignificant
1626	188 So. College St.	University of Akron - Orr Residence Hall	Akron	2014	No	Yes	Nonsignificant
1627	250 So. Forge St.	University of Akron - Polymer Engineering Academic Center	Akron	2014	No	Yes	Nonsignificant
1628	239 E. Mill St.	University of Akron - Roadway Building	Akron	2014	No	Yes	Nonsignificant
1629	464 Carroll St.	University of Akron - Sigma Nu	Akron	2014	No	Yes	Nonsignificant

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1630	277 E. Buchtel Ave.	University of Akron - Simmons Hall	Akron	2014	No	Yes	Nonsignificant
1631	211 University Ave.	University of Akron - Sisler-McFawn Residence Hall	Akron	2014	No	Yes	Nonsignificant
1632	190 So. College St.	University of Akron - Spanton Residence Hall	Akron	2014	No	Yes	Nonsignificant
1633	351 Grant St.	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1634	359 Grant St.	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1635	371 Grant St.	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1636	358 Sherman St.	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1637	366 Sherman St.	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1638	380 Sherman St	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1639	180 E. Exchange St.	University of Akron - Exchange St. Residence Hall	Akron	2014	No	Yes	Nonsignificant
1640	118-122 S. College St.	University of Akron - Trecasos	Akron	2014	No	Yes	Nonsignificant
1641	310 S. Union St.	University of Akron - General Grounds	Akron	2014	No	Yes	Nonsignificant
1642	265 Buchtel Common	University of Akron - Bulger Residence Hall	Akron	2014	No	Yes	Nonsignificant
1643	275 So. High St.	University of Akron - West Campus Parking Deck	Akron	2014	No	Yes	Nonsignificant
1644	225 Wolf Ledges Pkwy.	University of Akron - West Hall	Akron	2014	No	Yes	Nonsignificant
1645	1 General Street	Ohio Concrete Recycling, LLC (Eslich Environmental Inc.)	Akron	2014	No	Yes	Nonsignificant
1648	416 Kenmore Blvd.	Metro Regional Transit Authority	Akron	2014	No	Yes	Nonsignificant
1649	678 Killian Rd.	Fedex Freight, Inc.- AKR	Akron	2014	No	Yes	Nonsignificant
1650	820 Glaser Pkwy.	JRB Attachments, LLC	Akron	2014	No	Yes	Nonsignificant
1658	10 E. Firestone Blvd.	Bridgestone Americas Akron Technical Center	Akron	2014	No	Yes	Nonsignificant
1668	5174 S. Main St.	Hydra Carpet Cleaning Co.	Akron	2014	Yes	Yes	Out of Business
1675	1141 Tower Dr.	Coit Drapery & Carpet Cleaners	Akron	2014	No	Yes	Nonsignificant
1711	820 Belden Ave.	Walts Carpet and Floor Service	Akron	2014	Yes	Yes	Out of Business
1714	376 Sieber Ave.	A Better Way Carpet Cleaning	Akron	2014	Yes	Yes	Out of Business

NSID	MAILING_ADDRESS	COMPANY_NAME	CITY	SURVEY_YEAR	INSPECT	CHECK	STATUS
1717	275 N. Forge St.	Russell Products (FKA SI-019)	Akron	2014	No	Yes	Nonsignificant
1719	1144 E. Market St.	Goodyear Tech Center (FKA MI-026b)	Akron	2014	No	Yes	Nonsignificant
1729	1200 Firestone Parkway	Bridgestone Americas - Akron Tech Center	Akron	2014	No	Yes	Nonsignificant
1730	500 Edgewood Ave.	Akron Zoo	Akron	2014	No	Yes	Nonsignificant
1732	297 Ascot Pkwy.	Ultra Tech Machinery, Inc.	Cuyahoga Falls	2014	No	Yes	Nonsignificant
1734	485 Kenmore Blvd	The Ruscoe Co.	Akron	2014	No	Yes	Nonsignificant
1736	313 West North Street	Akron Classic Auto Body	Akron	2014	No	Yes	Nonsignificant
1737	130 East Voris St. Unit B	LEFF Electric	Akron	2014	No	Yes	Nonsignificant
1738	237 N. Adams St.	F. J. Stoltzka	Akron	2014	Yes	Yes	Out of Business
1739	E. Waterloo Rd. Parcell 6800295	Pro Tech Systems Group	Akron	2014	No	Yes	Nonsignificant
1753	920 Clay St.	Perfect Precision Machining, LTD	Akron	2014	No	Yes	Nonsignificant
1761	921 East Market St.	Middlebury Bunk	Akron	2014	Yes	Yes	Nonsignificant
1762	33 Kent St.	MK, Inc.	Akron	2014	Yes	Yes	Nonsignificant
1763	101 West Emerling Ave.	The National Lime & Stone Company	Akron	2014	Yes	Yes	Nonsignificant
1764	703 S. Cleveland-Massillon Rd.	Veyance Technologies	Fairlawn	2014	No	Yes	Nonsignificant
1765	70 Cuyahoga Falls Industrial Pkwy.	Eagle Elastomers, Inc.	Peninsula	2014	Yes	Yes	Nonsignificant
1766	124 Darrow Rd.	Osborne Stone Company	Akron	2014	Yes	Yes	Nonsignificant
1767	75 Cuyahoga Falls Industrial Pkwy.	Induction Hardening Specialists	Peninsula	2014	Yes	Yes	Nonsignificant
1768	80 Cuyahoga Falls Industrial Pkwy.	A & C Welding	Peninsula	2014	No	Yes	Nonsignificant
1769	90 Cuyahoga Falls Industrial Pkwy.	Decker Fasteners	Peninsula	2014	No	Yes	Nonsignificant
1771	200 Industrial Dr.	Pilot Plastics, Inc.	Peninsula	2014	Yes	Yes	Nonsignificant
1772	79 Cuyahoga Falls Industrial Pkwy.	Belfor Property Restoration	Peninsula	2014	Yes	Yes	Nonsignificant
1773	264 Wolf Ledges Pkwy.	University of Akron - Akron Engineering Research Center	Akron	2014	No	Yes	Nonsignificant
1774	315 Buchtel Common	University of Akron - Bierce Library	Akron	2014	No	Yes	Nonsignificant
1775	108 E. Exchange St.	University of Akron - DocuZip	Akron	2014	No	Yes	Nonsignificant
1776	108 E. Exchange St.	University of Akron - Dairy Queen	Akron	2014	No	Yes	Nonsignificant

NSID	MAILING_ADDRESS	COMPANY_NAME	CITY	SURVEY_YEAR	INSPECT	CHECK	STATUS
1777	108 E. Exchange St.	University of Akron - Starbucks	Akron	2014	No	Yes	Nonsignificant
1778	108 E. Exchange St.	University of Akron - Zee's	Akron	2014	No	Yes	Nonsignificant
1779	314 Carroll St.	University of Akron -First Energy Stadium	Akron	2014	No	Yes	Nonsignificant
1780	375 E. Exchange & 412 Vine St.	University of Akron - Infocision Stadium	Akron	2014	No	Yes	Nonsignificant
1781	240 Forge St.	University of Akron - National Polymer Innovation Center	Akron	2014	No	Yes	Nonsignificant
1782	146 Hill St.	University of Akron - Physical Facilities Operations Center	Akron	2014	No	Yes	Nonsignificant
1783	269 Buchtel Common	University of Akron - Ritchie Residence Hall	Akron	2014	No	Yes	Nonsignificant
1784	181 E. Exchange St.	University of Akron - South Campus Parking Deck	Akron	2014	No	Yes	Nonsignificant
1785	353 Grant St.	University of Akron - South Residence Hall	Akron	2014	No	Yes	Nonsignificant
1786	290 Spicer St.	University of Akron - Spicer Residence Hall	Akron	2014	No	Yes	Nonsignificant
1787	386 Sherman St.	University of Akron - Townhouse	Akron	2014	No	Yes	Nonsignificant
1788	178 Forge St.	University of Akron - Wonder Bread Building	Akron	2014	No	Yes	Nonsignificant