

February 26, 2024

**Transmitted Electronically**

Mayor and Council  
City of Galion  
301 Harding Way East  
Galion, Ohio 44833

Re:      City of Galion WWTP  
Inspection  
NPDES  
Crawford County  
2PD00030

Subject:      Ohio Environmental Protection Agency NPDES Inspection

Dear Mayor and Council:

Ohio EPA conducted a pretreatment compliance inspection at the City of Galion's Wastewater Treatment Plant (WWTP) located at 6374 Hosford Road, Galion, Ohio on February 7, 2024. Along with myself and Megan Girt from the Ohio EPA's Northwest District Office, Pat Hickman and Mark Armstrong were also present during the inspection.

The purpose of the inspection was to evaluate the implementation of the City of Galion's approved pretreatment program. The inspection included a file review of the following significant industrial users (SIUs) in the program: Carter Machine Co., LLC., and A&G Manufacturing. The file review followed a checklist evaluating the contents of their files.

**Facility Description:**

The City of Galion's WWTP was constructed in 1984 and last upgraded in 2012. The average design flow is 2.7 million gallons per day (MGD) and the peak hydraulic capacity is 8.5 MGD. The City has 100% separated sewers and serves the City of Galion and unincorporated areas in Crawford County. The Galion WWTP has the following treatment processes: influent pumping, bar screens, grit removal, primary clarifiers, pre-aeration, activated sludge with nitrification, secondary clarifiers, chlorination, dechlorination, and two polishing lagoons (see Figure 1).

There are two internal bypass locations, one after screening, which bypasses primary and secondary treatment, and one after the primary clarifiers, which bypasses secondary treatment. The bypass after screening, station 602, is triggered at flows that exceed about 8.5 MGD. The discharge goes through a pumping station, through the chlorine contact tank and then through tertiary lagoon No. 2 that provides some treatment. The discharge is controlled by a set-in-place weir with no operator adjustments to control when the discharge occurs. Discharge is only during periods of extreme wet weather flows. The bypass around secondary treatment, station 603, is located after primary clarification. Flows exceeding 6.8 MGD are diverted around the activated sludge system and secondary clarifiers to tertiary lagoon No.1 where flows are mixed with the secondary treatment effluent. The combined flows go through the chlorine contact tank and then through tertiary lagoon No. 2, which provides additional treatment.

The City of Galion has a pretreatment program which was approved by Ohio EPA. Included in this program are three categorical industrial users (IUs) that discharge 0.017 MGD of flow.

**Findings:**

1. Ohio EPA last completed an evaluation of the City of Galion's approved pretreatment program on the following dates:
  - a. Pretreatment Compliance Audit: January 29 & February 27, 2020, with an inspection letter dated March 5, 2020
  - b. Pretreatment Compliance Inspection: February 15, 2018, with an inspection letter dated February 27, 2018
2. The permitted IUs are Galion, LLC., A&G Manufacturing, and Carter Machine Co. LLC. All three are considered SIUs with applicable categorical standards.
3. Hauled wastewater from IUs is not accepted at the City of Galion's WWTP.
4. Two of the three IU's hold permits that are expired. Carter Machine Shop recently expired on January 28, 2024, and Galion LLC expired in 2022.
5. It was undetermined the last time that industrial users discharging to the publicly owned treatment works (POTW) were evaluated for determination if they needed to be regulated in the pretreatment program.
6. The City of Galion's Water Treatment Plant is not covered under a permit in the approved pretreatment program.
7. Monitoring and sampling reports from A&G Manufacturing have not been received in approximately 3 years. Enforcement activities for this have not been documented. Control authority (CA) (i.e. City of Galion) has not classified the IU as being in significant noncompliance (SNC). It is undetermined at this time if the IU is sending to the former superintendent. CA is investigating this further.
8. Only the first four pages of inspection form, located in the appendix of the pretreatment program binder, is being utilized by the City.
9. Permits issued by the City do not clearly identify the most stringent effluent limit for IUs. A table including the local limits is included with a note indicating where to locate the applicable categorical standards.
10. Evaluation of the need for a slug discharge control plan for the industrial users has not occurred since at least 2007. Ohio EPA did not review records prior to 2007 to determine the last known date.
11. Process wastewater, likely containing lime, is being batch discharged into the POTW. The source has not been positively identified. This process wastewater is causing interference, pass-through, corrosive structural damage, and flow obstructions at the WWTP.
12. City employees inquired about training opportunities for the pretreatment program.

13. Monitoring and sampling reports received from Carter Machine Co., LLC., did not contain chain of custody forms.
14. The City has not inspected or sampled any IUs during the timeframe of January 1, 2023, to January 1, 2024. Carter Machine Co. was last inspected January 29, 2020. A&G Manufacturing was last inspected on March 3, 2021. Page 5 of the inspection form for both IUs was not completed.
15. Carter Machine Co. has not been sampling for total toxic organics (TTOs) nor sending a certification statement in lieu of sampling for TTOs. The certification statement option is only allowed if the IU has an approved toxic organic management plan (TOMP) on file with the City; which Carter Machine Co. does not.
16. Carter Machine Co. operates under the following SIC codes according to the permit application: 3593, 3471, and 3499. SIC code 3471 is for electroplating which correlates to applicable categorical standards 40 CFR 413. The permit for Carter Machine Co. only includes local limits and categorical standards for 40 CFR 433.15.
17. Monitoring and sampling frequencies in IUs issued permits for certain parameters were listed as 4/Year.
18. Calculations for the combined wastestream formula and flow-weight averages were not observed in the files.
19. Staffing at the WWTP does not seem to be adequate; There are two class III's, two class I's, and one operator in training (OIT). Minimum required staffing at the WWTP is 40 hours per week at 5 days per week. The superintendent holds the role of being the superintendent, an operator, and maintaining the pretreatment program. There does not appear to be enough personnel to run the plant appropriately and maintain the pretreatment program concurrently.

**Recommendations:**

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

1. All permits issued under the City's approved pretreatment program should be renewed on time. This recommendation was originally communicated to the City in the inspection letter dated March 5, 2020.
2. Coverage under the pretreatment program is required for the City of Galion's Water Treatment Plant if they are discharging to the sanitary sewer system. We recommend regulating them by the City's approved pretreatment program within 30 days of this letter.
3. Evaluations for a slug discharge control plan should occur at least once each permit cycle. This recommendation was originally communicated to the City in the inspection letter dated March 5, 2020.
4. The most stringent limits applicable to IUs needs to be clearly identified in the IUs permit issued by the City. A table should be incorporated in the permit, that includes both local and categorical (if applicable), clearly identifying the most stringent limit. This recommendation was originally communicated to the City in the inspection letter dated March 5, 2020.

5. Renewal of the permit for Carter Machine Co. should reflect all applicable criteria, including 40 CFR 413 for the electroplating point source category.
6. Evaluation of all industrial users, including unpermitted IUs, discharging to the sanitary sewer system are recommended to be completed to determination whether they are required to be regulated by the pretreatment program.
7. The white wastewater that the WWTP is experiencing should be investigated further to determine the origination and take all necessary actions to mitigate.
8. Inspections of IUs should utilize all pages of the inspection report template located in the appendix of City's pretreatment program binder.
9. Investigate to determine why A&G Manufacturing has ceased self-monitoring reporting as required by their permit. If it is determined that the IU has not been completing the required self-monitoring over the past three years, the CA should begin implementing the approved enforcement response plan (ERP).
10. Monitoring and sampling reports received from IUs are required to have chain of custody forms attached to their laboratory results. The reports should be signed and certified. It is recommended to reach out the IUs to discuss these requirements further.
11. The CA should ensure that IUs are sampling for all required parameters included in each IUs permit.
12. A TOMP should be on file with the CA if there are TTOs listed in the permit for monitoring/sampling and the IU wishes to not sample for. A certification statement, as defined in 40 CFR, is required to be submitted each time a TTO sample is required to take place per the permit.
  - a. Certification statement as defined by 40 CFR: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority."
13. Combined wastestream formulas are recommended to be used when the industrial discharge commingles with sanitary discharge.
14. Staffing levels are recommended to be re-evaluated to ensure that there are adequate resources for operating and maintaining the plant and that the pretreatment program is implemented appropriately.
15. Continue implementing recommendations set forth in the inspection letter dated March 5, 2020. A copy of the inspection letter can be found at the following link:  
[edocpub.epa.ohio.gov/publicportal/ViewDocument.aspx?docid=1313199](http://edocpub.epa.ohio.gov/publicportal/ViewDocument.aspx?docid=1313199)

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16. The City of Galion is recommended to submit correspondence, via email, on plans moving forward with the implementation of the pretreatment program and resolving issues and required actions noted during this inspection.
17. U.S. EPA's website lists upcoming training and webinars for the pretreatment program. More information can be found at the following link: [epa.gov/npdes/national-pretreatment-program-training-and-webinars](http://epa.gov/npdes/national-pretreatment-program-training-and-webinars)
18. Additional resources for implementing the pretreatment program can be found at the following websites:
  - a. [epa.ohio.gov/divisions-and-offices/surface-water/permitting/pretreatment-program](http://epa.ohio.gov/divisions-and-offices/surface-water/permitting/pretreatment-program)
  - b. [epa.gov/npdes/national-pretreatment-program](http://epa.gov/npdes/national-pretreatment-program)

If you have any questions or comments concerning the enclosed inspection report, please contact me at 419.373.3008 or email at [mallorey.smith@epa.ohio.gov](mailto:mallorey.smith@epa.ohio.gov).

Sincerely,

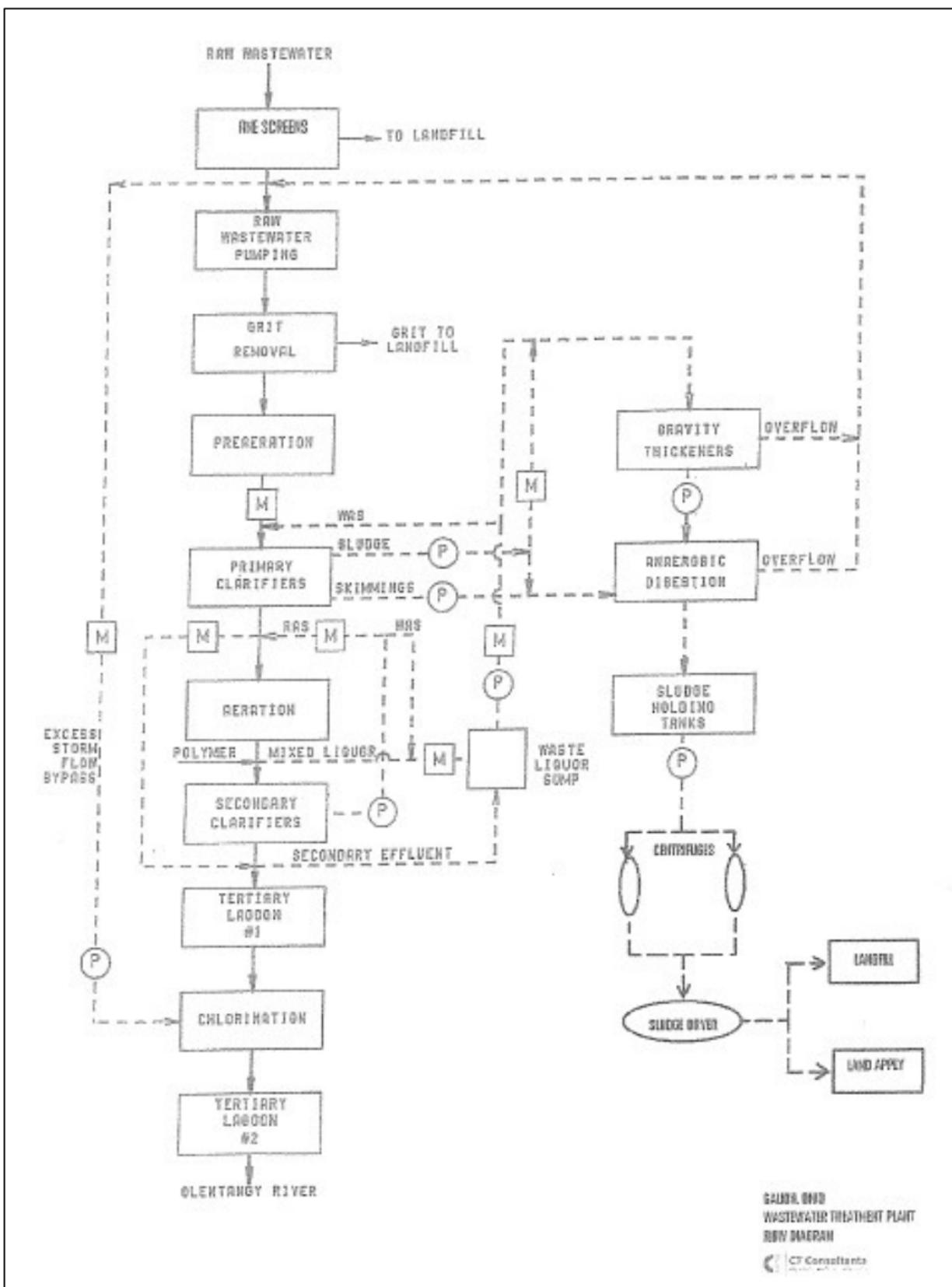


Mallorey Smith  
Environmental Specialist II  
Compliance and Enforcement  
Ohio EPA Division of Surface Water  
Northwest District Office

/cle

cc:  
ec: Mayor and Council  
Nicole Ward, Safety Service Director  
Patrick Hickman, WWTP Superintendent  
Megan Girt, Ohio EPA-DSW

Figure 1: Diagram of Wastewater Treatment Plant



# POTW PRETREATMENT COMPLIANCE CHECKLIST

## PCI CHECKLIST CONTENTS

### Cover Page and Acronym List

Section I	IU File Evaluation
Section II	Supplemental Data Review/Interview
<input checked="" type="checkbox"/> Section III	Evaluation and Summary (Optional)
<input type="checkbox"/> Attachment A	Pre-Inspection Checklist
<input type="checkbox"/> Attachment B	Pretreatment Program Profile
<input type="checkbox"/> Attachment C	Worksheets <input type="checkbox"/> WENDB/ RNC Worksheet <input type="checkbox"/> IU Site Visit Report Form (Optional) <input type="checkbox"/> File Review Worksheets (Optional)
<input type="checkbox"/> Attachment D	Supporting Documentation

Control Authority (CA) name and address	Date of PCI
Galion Wastewater Treatment Plant 6374 Hosford Road Galion, OH 44833	02.07.2024

### INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Mallorey Smith	Environmental Specialist II, Ohio EPA	419.373.3008
Megan Girt	Environmental Specialist II, Ohio EPA	419.373.3002

### CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
Pat Hickman	Superintendent	419.468.5010
Mark Armstrong	Crew Chief	419.468.5010

**ACRONYM LIST**

<b>Acronym</b>	<b>Term</b>
AO	Administrative Order
BMP	Best Management Practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally Different Factors
FTE	Full-Time Equivalent
FWA	Flow-Weighted Average
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not Applicable
ND	Not Determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total Toxic Organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base

**SECTION I: IU FILE EVALUATION**

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION	
FILE - A	Type of industry – Fabricated metal parts and chrome plating
Industry Name and Address Carter Machine Co. Inc. 820 Edward St. Galion, OH 44833	Industry visited during PCI? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> Categorical SIU - 40 CFR 433.15 Category(ies): Metal Finishing Point Source Category <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non-SIU	Average <u>Total</u> Flow (gpd) – 1580 Average <u>Process</u> Flow (gpd) – 90
<p style="text-align: center;">COMPLIANCE STATUS</p> <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance - corrected <input type="checkbox"/> Noncompliance/continuing <input checked="" type="checkbox"/> In compliance EXPLANATION: _____	
<p><b>Comments:</b></p> <p><b>1. Facility operates under the following SIC codes:</b></p> <ul style="list-style-type: none"> <li>○ <b>3593 – Fluid power cylinder and actuators; no applicable categorical standards</b></li> <li>○ <b>3471 - Electroplating, plating, polishing, anodizing, and coloring; applicable categorical standards 40 CFR 413 Electroplating Point Source Category</b> <ul style="list-style-type: none"> <li>▪ <b>40 CFR 413 was not applied in the permit</b></li> </ul> </li> <li>○ <b>3499 – Fabricated metal parts; applicable categorical standards 40 CFR 433.15 Metal Finishing Point Source Category</b></li> </ul>	

IU IDENTIFICATION	
FILE - B	Type of industry – Machining, welding, and fabricating
Industry Name and Address A&G Manufacturing 280 Gelsanliter Road Galion, OH 44833	Industry visited during PCI? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
IU CLASSIFICATION BY CA: <input checked="" type="checkbox"/> Categorical SIU - 40 CFR 433.15 Category(ies): Metal Finishing Point Source Category <input type="checkbox"/> Non-categorical SIU <input type="checkbox"/> Non-SIU	Average <u>Total</u> Flow (gpd) – 242-272 gpd Average <u>Process</u> Flow (gpd) – 30 gpd
<p style="text-align: center;">COMPLIANCE STATUS</p> <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance - corrected <input type="checkbox"/> Noncompliance/continuing <input checked="" type="checkbox"/> In compliance EXPLANATION: _____	
<p><b>Comments:</b></p> <ul style="list-style-type: none"> <li>• IU operates under <b>SIC Code 3499 – Fabricated metal parts; applicable categorical standards 40 CFR 433.15 Metal Finishing Point Source Category</b></li> <li>• IU has not been sending in monitoring/sampling results in approximately 3 years. CA has not identified the facility as being in SNC.</li> </ul>	

## **SECTION I: IU FILE EVALUATION**

Carter Machine Co.		A&G Manufacturing		INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.	
File A	File B	<b>Key</b> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time			
<b>IU FILE REVIEW</b>				<b>Regulation Citation</b>	
		<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>			
O	X	1. Issuance or reissuance of control mechanism			403.8(f)(1)(iii)
		2. Control mechanism contents			403.8(f)(1)(iii)
X	X	a. Statement of duration (<5 years)			
X	X	b. Statement of non-transferability w/o prior notification			
O	O	c. Listing of applicable effluent limits (local, categorical standards)			
		d. Self-monitoring requirements			
X	X	i. Identification of pollutants to be monitored			
O	X	ii. Sampling frequency			
X	X	iii. Sampling at locations/discharge points adequately defined			
X	X	iv. Appropriate sample types (grab or composite)			
X	X	v. Reporting requirements			
X	X	vi. Record-keeping requirements (3 years minimum)			
X	X	e. Statement of applicable civil and criminal penalties			
NA	NA	f. Compliance schedules			
X	X	g. Requirement to notify CA of slug loadings			
X	X	h. Requirement to notify CA of spills, bypasses, upsets, etc.			
X	X	i. Requirement to notify CA of significant change in discharge			
X	X	j. 24-hour notification of violation/resample requirement			

				INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.	
				<u>Key</u>	
				X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
<u>File A</u>	<u>File B</u>	<b>IU FILE REVIEW</b>			
		<b>C. CA APPLICATION OF IU PRETREATMENT STANDARDS</b>			
X	X	1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)		403.8(f)(1)(ii)	
		2. Calculation and application of categorical standards		403.8(f)(1)(ii)	
X	X	a. Proper classification by category/subcategory			
X	X	b. Proper classification as new/existing source			
X	X	c. Proper application of limits for all regulated pollutants			
ND	ND	d. Proper calculation and application of production-based standards		403.6(c)	
ND	ND	e. Proper calculations and application of CWF or FWA		403.6(d)&(e)	
X	X	3. Application of local limits			
O	O	4. Application of most stringent limits		403.8(f)(1)(ii)	



		INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.				
		<u>Key</u>				
		X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time				
<u>File A</u>	<u>File B</u>	<b>IU FILE REVIEW</b>				<u>Regulation Citation</u>
		<b>E. CA ENFORCEMENT ACTIVITIES</b>				
		1. Response to violations				403.8(f)(2)(vi)
X	ND	a. Discharge violations				
X	O	b. Monitoring/reporting violations				
NA	NA	c. Compliance schedule violations				
		2. Proper calculation of SNC				403.8(f)(2)(vii)
X	O	a. Chronic				
X	ND	b. TRC				
NA	ND	c. Pass-through/interference caused by spill or slug discharge				
X	O	d. Reporting requirements				
NA	ND	3. Publication for SNC				403.8(f)(2)(vii)
		4. Adherence to approved ERP				403.8(f)(5)
X	O	a. Proper response to violations				
X	O	b. Escalation of enforcement				

Carter Machine Co.		A&G Manufacturing		INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.	
File A	File B			Key	
<b>IU FILE REVIEW</b>					
				<b>F. SELF-MONITORING AND REPORTING</b>	
0	0			1. Sampled at frequency specified in control mechanism/regulation	403.12(e)&(h)
				2. TTO Requirements met	
0	0			a. TOMP submitted and updated (if applicable)	
0	0			b. TTO sample results or certification statement submitted as required	
X	0			3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
0	0			4. Reported for all required pollutants	403.12(g)(1)&(h)
X	0			5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
NA	NA			6. Met compliance schedule milestones by required dates	403.12(c)
NA	ND			7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
X	0			8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
X	0			9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
0	0			10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
ND	ND			11. Notified CA of significant changes in operation or discharge	403.12(j)
<b>Comments for Section F. Self-Monitoring and Reporting:</b>					
<ul style="list-style-type: none"> <li>• <b>File A:</b> <ul style="list-style-type: none"> <li>○ <b>TTOs not sampled or reported</b></li> <li>○ <b>TOMP not on file; no certified statement in lieu of sampling</b></li> <li>○ <b>No slug discharge control plan evaluation</b></li> </ul> </li> <li>• <b>File B:</b> <ul style="list-style-type: none"> <li>○ <b>Not adhering to self-monitoring requirements. Reports haven't been received in approximately 3 years</b></li> </ul> </li> </ul>					

<b>Carter Machine Co.</b>	<b>A&amp;G Manufacturing</b>				INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files. <u>Key</u> X – No problems are noted O – There is an issue with this component NA – Not Available or Not Applicable ND – Not Determined at this time	
<b>File A</b>	<b>File B</b>				<b>IU FILE REVIEW</b>	<b>Regulation Citation</b>
<b>O</b>	<b>O</b>				<b>G. OTHER</b>	

**Comments for Section G. Other:**

- The pretreatment program has not been maintained over the past several years.
- A&G may be sending their reports to the former superintendent. CA is looking into this.

SECTION I COMPLETED BY:	Mallorey Smith	DATE:	02.07.2024
TITLE:	Environmental Specialist II	TELEPHONE:	419.373.3008

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW**

INSTRUCTIONS: Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

**A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]**

1. Have you made any changes to the approved program since the last inspection?  Yes  No  
(Local limits, ERP, SUO, control mechanisms, SIU list, etc.)

Comments: N/A

2. Have you identified any needed changes?  Yes  No

Comments: N/A

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

1. How do you identify and characterize new IUs? Is an Industrial Waste Survey (IWS) used?

*IWS is sent by the zoning department for any new and/or potential IUs.*

2. How and when do you identify changes in wastewater discharges at existing IUs? How do you determine if they need to be classified as a SIUs?

*They talk to the IUs and inspect every 1.5 years. Unsure how to determine if need to be classified as SIU. They would base it on their processes.*

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

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

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

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

#	Total SIUs
2	3
66.6	%

Comments: Galion LLC & Carter are expired.

2. How many control mechanisms were...

# Control Mechanisms
2
2

Comments: Galion LLC expired in 2022 and Carter Machine Co. expired on January 28, 2024.

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

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

Yes  No

*Comments: Uses application that requests for discharge information, CA uses quarterly monitoring results*

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

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

a. Is the CA's definition of slug discharge different from the federal or state definitions [40 CFR 403.8(f)(2)(vi) and OAC 3745-3-01]?

Yes  No

*Comments: N/A*

b. How and when do these evaluations occur? (check on CA's definition of slug discharge)

*Comments: City stated during the renewal process or as needed. However, there is no documentation to support this.*

c. How many SIUs were evaluated in the past two years?

# SIUs: 0

*Comments: 1 permit was renewed in the past 2 years by the former superintendent. Permit application listed N/A for slug discharge control plan.*

2. Do any IUs haul their wastewater to the POTW?

If "Yes, complete Questions 2.a – c below.

Yes  No

a. Describe these hauled wastes:

*N/A*

b. How do you ensure all applicable standards (local and categorical) are met?

*N/A*

c. List all IUs that haul their wastewater to the POTW:

*N/A*

## E. COMPLIANCE MONITORING

1. In the past 12 months, how many (and what percentage of) SIUs were the following? [403.8(f)(2)(v)] [WENDB~NOIN][RNC~II]

Define the 12-month period: January 1, 2023 – January 1, 2024

	#	Total SIUs
a. Not sampled or inspected at least once [WENDB-NOIN]	3	3
	100	%
b. Not sampled at least once	3	3
	100	%
c. Not inspected at least once	3	3
	100	%

Comments: CA has not sampled or inspected any of their permittees during the time period defined above.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB~SNIN]

1

Comments: Technically A&G would be in SNC; however, CA has not defined them as being in SNC. A&G has not completed self-monitoring in approximately 3 years. Not inspected or sampled.

## F. Enforcement

1. Which of the following enforcement actions did you use during the past year?

	Yes	No	Comments (if any)
a. Notice or letter of violation	✓		
b. Administrative Order	✓		
c. Administrative Fine	✓		
d. Show cause hearing	✓		
e. Compliance schedule	✓		
f. Permit revocation	✓		
g. Civil suits	✓		
h. Criminal suits	✓		
i. Termination of service	✓		
j. Other (Specify)	✓		

Other Comments: The pretreatment program has not been maintained over the past few years.

#### F. Enforcement

2. Did the treatment plant experience any of the following during the past year?

	Yes	No	Comments (if any)
a. Interference	✓		<b>Raw influent has had white wastewater come into the plant on several occasions</b>
b. Pass Through	✓		<b>White wastewater passes through the plant, readily mixes with the wastewater, and comes out in the cake from sludge dryer</b>
c. Fire or explosions (flashpoint, etc.)		✓	
d. Corrosive structural damage	✓		<b>Sludge transfer pumps: Impellers, pumps, and casing have significant abrasion from the inside out. Piping throughout the plant has abrasion inside.</b>
e. Flow obstructions	✓		<b>Settles in the bottom of the digester tank then POTW must pump out of the bottom of the digester then centrifuge gets clogged. Large chunks of lime come out in the sludge drying process.</b>
f. Excessive flow rates		✓	
g. Excessive pollutant concentrations	✓		<b>White wastewater can increase the alkalinity by 2.0 to 3.0</b>
h. Heat problems		✓	
i. Interference due to Oil & Grease		✓	
j. Toxic fumes		✓	
k. Illicit dumping of hauled wastes		✓	
l. Worker health and safety concerns		✓	
m. Other (Specify)		✓	

Other Comments: The discolored influent has not been addressed by CA.

3. Were you made aware of any hazardous waste discharges to the POTW? [403.12(j) and (p)]

Yes  No

Comments: N/A

#### G. GENERAL OBSERVATIONS / INFORMATION ENFORCEMENT

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

Yes  No

Comments: Staffing at the WWTP does not seem to be adequate; There are two class III's, two class I's, and one operator in training (OIT). Minimum required staffing at the WWTP is 40 hours per week at 5 days per week. The superintendent holds the role of being the superintendent, an operator, and maintaining the pretreatment program. There does not appear to be enough personnel to run the plant appropriately and maintain the pretreatment program concurrently.

SECTION II COMPLETED BY:	Mallorey Smith	DATE:	02.07.2024
TITLE:	Environmental Specialist II	TELEPHONE:	419.373.3008

## CA PRETREATMENT PROGRAM MODIFICATION

1. Status of program modifications [40 CFR 403.18 / Checklist II.A.1]

Action Recommended  
 Action Required

*No recommendations*

## IU CHARACTERIZATION

2. Identify and locate all SIUs [40 CFR 403.8(f)(2) / Checklist II.B]

Action Recommended  
 Action Required

*Re-evaluate all industries in the service area to determine if they need to be regulated by the pretreatment program.*

3. Identify the character and volume of pollutants contributed to the POTW by IUs [40 CFR 403.8(f)(2)(ii) / Checklist II.B.1, II.E.1]

Action Recommended  
 Action Required

*Inspections and sampling of IUs are required to be conducted by the CA.*

## CONTROL MECHANISM EVALUATION

4. Issue individual control mechanisms to all SIUs [40 CFR 403.8(f)(2) / Checklist I.B.1, II.C]

Action Recommended  
 Action Required

*Two out of three SIUs permits are expired. These are to be renewed immediately.*

5. Ensure control mechanisms contain all required components [40 CFR 403.8(f)(1)(iii) / Checklist I.B.2]

Action Recommended  
 Action Required

*Parameters that are specified to be sampled/monitored for 4/Year should be rephrased to 1/Quarter. Parameters in the permit should be easily identifiable as to what limit is the most stringent, local or categorical.*

## APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

6. Apply all applicable pretreatment standards [40 CFR 403.8(f)(1)(iii), 403.5 / Checklist I.C.1-4]

Action Recommended  
 Action Required

*Parameters in the permit should be easily identifiable as to what limit is the most stringent, local or categorical.*

7. Evaluate the need for SIUs to develop slug discharge control plans [40 CFR 403.8(f)(2)(vi) / Checklist I.D.7, II.D.1]

Action Recommended  
 Action Required

*SIUs are required to be evaluated for the need to develop a slug discharge control plan at least once since 2007 and recommended to be completed at least every permit cycle thereafter.*

## COMPLIANCE MONITORING

8. Inspect and sample each SIU in accordance with the approved program [Checklist I.D.1 & 5, II.E.1]

Action Recommended  
 Action Required

*All SIUs are required to be sampled and inspected once per year by the CA.*

9. Use proper sampling analysis (40 CFR Part 136) and inspection procedures [40 CFR 403.8(f)(2)(v) / Checklist I.D.2-3,4,6, & 7]

Action Recommended  
 Action Required

*The full inspection report checklist should be utilized.*

COMPLIANCE MONITORING	
10. Require, receive, and analyze reports from SIUs at least once every 6 months [40 CFR 403.12(e)&(h) / Checklist I.F]	<input type="checkbox"/> Action Recommended <input checked="" type="checkbox"/> Action Required
<i>Ensure all SIUs are self-monitoring according to their permit terms and conditions.</i>	
11. IU submitting resampling results 30 days after being aware of a violation [40 CFR 403.12(g)(1)&(2) / Checklist I.F.9]	<input type="checkbox"/> Action Recommended <input type="checkbox"/> Action Required
<i>No recommendations</i>	
12. Require self-monitoring reports from IUs to be signed and certified [40 CFR 403.12(l) / Checklist I.F.5]	<input type="checkbox"/> Action Recommended <input checked="" type="checkbox"/> Action Required
<i>Upon receipt of self-monitoring reports from IUs, ensure they are signed and certified.</i>	
13. Receive notification of significant changes in operation or discharge, including hazardous waste discharges [40 CFR 403.12(p) / Checklist I.F.11]	<input type="checkbox"/> Action Recommended <input type="checkbox"/> Action Required
<i>No recommendations</i>	
ENFORCEMENT	
14. Implement the approved ERP [40 CFR 403.8(f)(5) / Checklist I.E.4]	<input type="checkbox"/> Action Recommended <input checked="" type="checkbox"/> Action Required
<i>As facilities become noncompliant, ensure the CA is following the approved ERP.</i>	
15. Annually publish a list of IUs in SNC [40 CFR 403.8(f)(2)(vii) / Checklist I.E.3]	<input type="checkbox"/> Action Recommended <input checked="" type="checkbox"/> Action Required
<i>All IUs that are in SNC during a calendar year are required to be published.</i>	
16. Develop IU compliance schedules [40 CFR 403.8(f)(1)(iv) / Checklist I.B.2.f, II.F.1.e]	<input type="checkbox"/> Action Recommended <input type="checkbox"/> Action Required
<i>No recommendations</i>	
17. Ensure IU compliance within 3 years of standards' effective date (or less than 3 years where required by standard) [40 CFR 403.6(b)]	<input checked="" type="checkbox"/> Action Recommended <input type="checkbox"/> Action Required
<i>No recommendations as there aren't any IUs that recently joined the program. Moving forward, if new IUs are added, ensure their compliance within 3 years per 40 CFR 403.6(b).</i>	
18. Ensure new sources report on compliance with appropriate standards within the first 90 days of discharge [40 CFR 403.12(d) / Checklist I.A]	<input type="checkbox"/> Action Recommended <input type="checkbox"/> Action Required
<i>No recommendations. No new sources.</i>	
ADDITIONAL EVALUATIONS	
19. Electronic Reporting [40 CFR 403.12(i)]	<input type="checkbox"/> Action Recommended <input type="checkbox"/> Action Required
<i>Not evaluated</i>	

SECTION III COMPLETED BY:	Mallorey Smith	DATE:	02.20.2024
TITLE:	Environmental Specialist II	TELEPHONE:	419.373.3008