OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Crawford County
City of Galion
Pretreatment Program

February 5, 2008

Mr. Dave Oles, City Manager
City of Galion
301 Hardingway East
Galion, Ohio 44833

Dear Mr. Oles:

On December 20, 2007, a pretreatment compliance inspection (PCI) of the City of Galion's approved pretreatment program was conducted. The inspection followed a checklist designed to evaluate the major areas of the city's program, a file review, and an inspection of one of the City's industrial users. Our inspection findings and recommendations are summarized below.

The WWTP does not accept septage, but it does take leachate from the Crawford County landfill. This hauled waste is monitored under the landfill's permit.

All inspections and sampling requirements are being carried out. Mr. Parks' implementation of Galion's approved pretreatment program remains satisfactory.

The file for HYDRANAMICS, Inc. was reviewed. The file was well maintained with all necessary contents in order. All pretreatment standards are defined and applied appropriately.

I accompanied Mr. Tim Parks, Superintendent on his pretreatment inspections of HYDRANAMICS, Inc. The inspection was conducted appropriately. The inspection indicated that they had corrected the issue of not properly storing their acids and bases, which was noted in the last inspection.

In summary, it appears that the City is maintaining an adequate pretreatment program. A copy of our completed inspection form is enclosed for your review. If you have any questions, please contact me at (419) 373-3019.

Sincerely,

Michelle Sharp

Michelle Sharp
Division of Surface Water

/llr

pc: Tim Parks, Superintendent, Galion WWTP w/ enclosure
Julia Zhang, CO, DSW, w/enclosure
DSW-NWDO File w/ enclosure

POTW PRETREATMENT COMPLIANCE CHECKLIST

PCI CHECKLIST CONTENTS

Cover Page and Acronym List
Section I IU File Evaluation
Section II Supplemental Data Review/Interview
Section III Evaluation and Summary (Optional)
[1] Attachment A Pre-Inspection Checklist
[2] Attachment B Pretreatment Program Profile
Attachment C Worksheets
[3] WENDB/RNC Worksheet
[4] IU Site Visit Report Form (Optional)
[5] File Review Worksheets (Optional)
Attachment D Supporting Documentation

Control Authority (CA) name and address	Date(s) of PCI
City of Galion ***6374 Hosford Rd*** ***Galion, Ohio 44805***	***12-20-2007***

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
Michelle Sharp	***ESII/Ohio EPA***	***419-373-3019***

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
Tim Parks	***Superintendent/Galion WWTP***	***419-468-5010***

ACRONYM LIST

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

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 1 Industry name and address	Type of industry
HYDRANAMICS, Inc. ***A Division of Carter Machine Co., Inc.*** ***820 Edward St.*** ***Galion, Ohio 44833***	***Metal Finishing***

IU CLASSIFICATION BY CA:	Average total flow (gpd)	Average process flow (gpd)
☒ Categorical SIU - 40 CFR 433, _____, Category(ies) _____ ☐ Non-categorical SIU ☐ Non SIU	Industry visited during PCI? Yes ☒ No ☐	

COMPLIANCE STATUS

☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing ☒ In compliance

EXPLANATION:

Comments

FILE ____ Industry name and address	Type of industry

IU CLASSIFICATION BY CA:	Average total flow (gpd)	Average process flow (gpd)
☐ Categorical SIU - 40 CFR _____, _____, Category(ies) _____ ☐ Non-categorical SIU ☐ Non SIU	Industry visited during PCI? Yes ☐ No ☐	

COMPLIANCE STATUS

☐ SNC (period: _____) ☐ Noncompliance/corrected ☐ Noncompliance/continuing ☐ In compliance

EXPLANATION:

Comments

General Comments

SECTION I: IU FILE EVALUATION

Industry Name					
HYDRANAMICS, Inc.					INSTRUCTIONS: Evaluate the contents of IU files. Enumerate problem areas and explain in comments section below. Use NA (not available) where necessary. Use ND (not determined) where there is insufficient information to evaluate/determine implementation status. Use an "*x*" in the space when a problem is not noted. Comment on each problem identified. Clearly identify the file that each comment pertains to; also indicate where a comment applies to all the files.

File *1*	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. CA NOTIFICATION OF IU	
x					1. Notified of classification (new IU) or change in classification (existing IU)	403.8(f)(2)(iii)
x					B. BMR/90-day report submitted (for new IU)	403.12(b)&(d)
x					2. Notified of applicable RCRA standards	403.8(f)(2)(iii)

Comments

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
x					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
x					a. Statement of duration (<5 years)	
					b. Statement of nontransferability w/o prior notification	
x					c. Listing of applicable effluent limits (local, categorical standards)	
					d. Selfmonitoring requirements	
x					i Identification of pollutants to be monitored	
					ii Sampling frequency	
x					iii Sampling at locations/discharge points adequately defined	
					iv Appropriate sample types (grab or composite)	
x					v Reporting requirements	
					vi Record-keeping requirements (3 years minimum)	
x					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
x					g. Requirement to notify CA of slug loadings	
					h. Requirement to notify CA of spills, bypasses, upsets, etc.	
x					i. Requirement to notify CA of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. CA APPLICATION OF IU PRETREATMENT STANDARDS	
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					a. Proper classification by category/subcategory	
					b. Proper classification as new/existing source	
x					c. Proper application of limits for all regulated pollutants	
					d. Proper calculation and application of production-based standards	403.6(c)
x					e. Proper calculations and application of CWT or LWA	403.6(d)&(e)
					3. Application of local limits	
x					4. Application of most stringent limits	403.8(f)(1)(ii)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	403.8(f)(1)(iii)(D)
					1. Sampled at frequency specified in approved	
x					2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
					3. Sampled all parameters for which local or categorical limits applied	
x					4. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	403.8(f)(2)(v)
x					1. Inspected at frequency specified in approved program	
					2. Documentation of inspection activities	403.8(f)(2)(vi)
x					3. Evaluated need for slug discharge control plan at least every two years	403.8(f)(2)(v)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. LCA ENFORCEMENT ACTIVITIES	
NA					1. Response to violations	403.8(f)(2)(vi)
NA					a. Discharge violations	
NA					b. Monitoring/reporting violations	
NA					c. Compliance schedule violations	
NA					2. Proper calculation of SNC	403.8(f)(2)(vii)
NA					a. Chronic	
NA					b. TRC	
					c. Pass-through/interference caused by spill or slug discharge	
NA					d. Reporting requirements	
NA					3. Publication for SNC	403.8(f)(2)(vii)
NA					4. Adherence to approved ERP	403.8(f)(5)
NA					a. Proper response to violations	
NA					b. Escalation of enforcement	

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. SELF-MONITORING AND REPORTING	
X					1. Sampled at frequency specified in control mechanism regulation	403.12(e)&(h)
					2. TTO Requirements met	
X					a. TOMP submitted and updated (if applicable)	
					b. TTO sample results or certification statement submitted as required	
X					3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
X					4. Reported for all required pollutants	403.12(g)(1)&(h)
X					5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
NA					6. Met compliance schedule milestones by required dates	403.12(c)
NA					7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
NA					8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
NA					9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
X					10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
X					11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments:

SECTION I COMPLETED BY:	*Michelle Sharp*	DATE:	*January 31, 2008*
TITLE:	*ESII*	TELEPHONE:	*419-373-3019*

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

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

If yes, discuss.

	Yes	No
2. Have you identified any needed changes?		x

If yes, describe.

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

1. How do you identify and characterize new IUs?
(is IWS used?)
Inspection is done at the facility when the facility files applications.

2. How and when do you identify changes in wastewater discharges at existing IUs
(especially to determine if they need to be classified as a SIUs)
Yearly inspections are completed and random quarterly sampling.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

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

0	%

2. a. How many control mechanisms were allowed to expire prior to reissuance?
   If any explain.

0

   b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC~II]
   If any, explain.

0

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

Yes	No
x	

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

1. a. How and when do you evaluate SIUs for the need to develop slug control discharge plans?
(check on CA's definition of slug discharge)
If any, explain.

Question in Application

b. How many SIUs were evaluated in the past two years? **3**

2. a. Describe any wastes hauled to the POTW.

Leachate from landfill.

b. If any Ius have their wastewater hauled to the POTW, how do you ensure all applicable standards (local and categorical) are met?

Sample and through their lab reports.

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

Santek Environmental

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 ***November 2006*** to ***November 2007***.)

a. Not sampled or not inspected at least once [WENB-NOIN]	*0*	%
b. Not sampled at least once	*0*	%
c. Not inspected at least once (all parameters)?	*0*	%

If any, explain.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB~SNIN] **0**
If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

E. ENFORCEMENT

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

	Yes	No
a. Notice or letter of violation	X	
b. Administrative Order		X
c. Administrative fine		X
d. Show cause hearing		X
e. Compliance schedule	X	
f. Permit revocation		X
g. Civil suits		X
h. Criminal suits		X
i. Termination of service		X
j. Other (specify)		X

Explain if appropriate:

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

	Yes	No	Explain
a. Interference		X	
b. Pass through		X	
c. Fire or explosions (flashpoint, etc.)		X	
d. Corrosive structural damage		X	
e. Flow obstructions		X	
f. Excessive flow rates		X	
g. Excessive pollutant concentrations		X	
h. Heat problems		X	
i. Interference due to O & G		X	
j. Toxic fumes		X	
k. Illicit dumping of hauled wastes		X	
l. Worker health and safety concerns		X	
m. Other (specify)		X	

If yes, how did you respond?

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT (continued)

	Yes	No
3. Were you made aware of any hazardous waste discharges to the POTW? [403.12 (j)&(p)]		x

G. GENERAL OBSERVATIONS/INFORMATIONENFORCEMENT

	Yes	No
Have you had any problems (general or specific) implementing your approved program?		x

Additional Comments/Observations/Information:

SECTION I COMPLETED BY:	*Michelle Sharp*	DATE:	*January 31, 2008*
TITLE:	*ESII*	TELEPHONE:	*419-373-3019*

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
• Status of program modifications (Ref. 403.18 /Checklist II.A.1)	***None***	***None***
B. LEGAL AUTHORITY		
• Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)	***None***	***None***
• Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)	***None***	***None***

Description	Recommended Action	Required Action
C. IU CHARACTERIZATION		
• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)	***None***	***None***
D. CONTROL MECHANISM		
• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/ Checklist II.D.1)	***None***	***None***
Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)	***None***	***None***

Description	Recommended Action	Required Action
Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/ Checklist II.D.3&4)	***None***	***None***
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
• Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&(iii); 403.5 /Checklist I.A)	***None***	***None***
• Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3)	***None***	***None***
F. COMPLIANCE MONITORING		
• Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1)	***None***	***None***

Description	Recommended Action	Required Action
• Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1)	*None*	*None*
• Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4)	*None*	*None*
• Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F)	*None*	*None*
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)	*None*	*None*

Description	Recommended Action	Required Action
• Evaluate the need for SIUs to develop slug discharge control plans (Ref. 403.8(f)(2)(v)/Checklist I.B.2.d; II.F.8)	***None***	***None***
• Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b)	***None***	***None***
G. ENFORCEMENT		
• Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1)	***None***	***None***

Description	Recommended Action	Required Action
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	*None*	*None*
• Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4)	*None*	*None*
• Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&5;II.G.2.c&d, 5&6)	*None*	*None*

Description	Recommended Action	Required Action
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
• Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H)	***None***	***None***
I. RESOURCES		
• Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)	***None***	***None***

Description	Recommended Action	Required Action
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
• Understanding of pollutants from all sources (Checklist II.J.1&2)	***None***	***None***
• Documentation of environmental improvements/effectiveness (Checklist II.J.1)	***None***	***None***
• Integration of pollution prevention (Checklist II.J.3,4&5)	***None***	***None***

Description	Recommended Action	Required Action
K. ADDITIONAL EVALUATIONS/INFORMATION		

SECTION III COMPLETED BY:	*Michelle Sharp*	DATE:	*January 31, 2008*
TITLE:	*ESII*	TELEPHONE:	*419-373-3019*

WENDB AND RNC WORKSHEET

FACILITY INFORMATION	
Name *City of Galion WWTP*	Date of Inspection *December 20, 2007*
OH Number *OH0025313*	NPDES Number *2PD00030*

I. WENDB DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

		Checklist Reference		PCS
	Data	PCI	AUDIT	**Code**
Number of SIUs	*5*	Annual	Annual	SIUS
Number of CIUs	*5*	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	-	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	-	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	-			PSNC
Number of SIUs in SNC with self-monitoring	-			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	-	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	-			
Technical Evaluation of Local Limits (Y/N) (Audit)	-			
Adoption of technically-based limits (Y/N) (Audit)	-			

II. RNC/SNC WORKSHEET

INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC

	RNC	Level	Reference	
			PCI	Audit
-	Failure to enforce against pass through and/or interference	I		
-	Failure to submit required reports within 30 days	I		
-	Failure to meet compliance schedule milestone date within 90 days	I		
-	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.2.b	II.D.1.b
-	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.1	II.F.1
-	Failure to enforce pretreatment standards and reporting requirements	II		I.C.1
-	Other (specify)	II		
	SNC			
-	Control Authority in SNC for violation of any Level I criterion			
-	Control Authority in SNC for violation of two or more Level II criterion			