



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
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

June 30, 2009

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

Dear Mr. Oles:

On December 8, 2008, 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 and a file review. 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. The file for A&G Plant 2 was reviewed. The file was well maintained with all necessary contents in order. All pretreatment standards are defined and applied appropriately. Mr. Parks has not yet implemented the stream lining rules. A copy of the rules is enclosed with this letter. All inspections and sampling requirements are being carried out. Mr. Parks' implementation of Galion's approved pretreatment program remains satisfactory.

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

/lb

pc: Tim Parks, Superintendent, Galion WWTP w/ enclosure and copy of streamlining rules  
Ryan Laake, CO, DSW, w/enclosure  
~~DSW-NWDO File w/ enclosure~~





# PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME <i>Galion WWTP</i>		PERMIT NUMBER <i>2PD00030</i>	FACILITY NUMBER <i>OH0025313</i>
INSPECTION TYPE <i>P</i>	INSPECTOR <i>Sharp</i>	FACILITY TYPE <i>1</i>	DATE CONDUCTED <i>December 8, 2008</i>

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY <i>City of Galion WWTP 6374 Hosford Rd. Galion, Ohio 44833</i>
MAILING ADDRESS OF FACILITY <i>City of Galion WWTP 6374 Hosford Rd. Galion, Ohio 44833</i>
CONTACT (NAME/TITLE/PHONE) <i>Mr. Tim Parks/ WWTP Superintendent/419-468-5010</i>

FACILITY EVALUATION						
(S = Satisfactory, M = Marginal, U = Unsatisfactory)						
<table border="1" style="width: 100%;"> <tr> <td style="width: 50%; height: 60px;"></td> <td style="width: 50%; height: 60px;"></td> </tr> <tr> <td style="width: 50%; height: 20px;"></td> <td style="width: 50%; height: 20px;"></td> </tr> <tr> <td style="width: 50%; height: 20px;"></td> <td style="width: 50%; height: 20px;"></td> </tr> </table>						
* See inspection letter						

Names(s) and Signature(s) of Inspector(s) <i>Michelle Sharp</i> Michelle Sharp	Agency / Office / Telephone Ohio EPA/NWDO/419-373-3019	Date <i>6-30-09</i>
Signature of Reviewer <i>Elizabeth Wick</i> Elizabeth Wick	Ohio EPA/NWDO/419-373-3002	Date <i>6-30-09</i>

# 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)
- Attachment A Pre-Inspection Checklist
- Attachment B Pretreatment Program Profile
- Attachment C Worksheets
  - WENDB/ RNC Worksheet
  - IU Site Visit Report Form (Optional)
  - File Review Worksheets (Optional)
- Attachment D Supporting Documentation

Control Authority (CA) name and address	Date(s) of PCI
<i>City of Galion 6374 Hosford Rd Galion, Ohio 44805</i>	<i>12-8-2008</i>

### INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
<i>Michelle Sharp</i>	<i>ESII/Ohio EPA</i>	<i>419-373-3019</i>

### CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
<i>Tim Parks</i>	<i>Superintendent/Galion WWTP</i>	<i>419-468-5010</i>

## 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  
*A & G Plant #2*  
*165 Gelsanliter Rd.*  
*Galion, Ohio 44833*

Type of industry  
*Metal Finishing*

IU CLASSIFICATION BY CA:

Categorical SIU - 40 CFR 3499, \_\_\_\_\_,

Category(ies) \_\_\_\_\_

Non-categorical SIU

Non SIU

Average total flow  
 (gallons per month)

14,212

Average process flow (gpd)

300

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:

Categorical SIU - 40 CFR \_\_\_\_\_, \_\_\_\_\_,

Category(ies) \_\_\_\_\_

Non-categorical SIU

Non SIU

Average total flow (gpd)

Average process flow (gpd)

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

**SECTION I: IU FILE EVALUATION (Continued)**

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

Comments:

**SECTION I: IU FILE EVALUATION (Continued)**

File I	File	File	File	File	IU FILE REVIEW	Reg. Cite
<b>C. CA APPLICATION OF IU PRETREATMENT STANDARDS</b>						
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	
x					b. Proper classification as new/existing source	
x					c. Proper application of limits for all regulated pollutants	
x					d. Proper calculation and application of production-based standards	403.6(c)
x					e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
x					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 <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>D. CA COMPLIANCE MONITORING</b>	
					Sampling	403.8(f)(1)(iii)(D)
x					1. Sampled at frequency specified in approved	
x					2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
x					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	
x					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 <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
<b>E. CA ENFORCEMENT ACTIVITIES</b>						
<i>x</i>					1. Response to violations	403.8(f)(2)(vi)
<i>x</i>					a. Discharge violations	
<i>NA</i>					b. Monitoring/reporting violations	
<i>NA</i>					c. Compliance schedule violations	
<i>NA</i>					2. Proper calculation of SNC	403.8(f)(2)(vii)
<i>NA</i>					a. Chronic	
<i>NA</i>					b. TRC	
<i>NA</i>					c. Pass-through/interference caused by spill or slug discharge	
<i>NA</i>					d. Reporting requirements	
<i>NA</i>					3. Publication for SNC	403.8(f)(2)(vii)
<i>NA</i>					4. Adherence to approved ERP	403.8(f)(5)
<i>NA</i>					a. Proper response to violations	
<i>NA</i>					b. Escalation of enforcement	

Comments:

**SECTION I: IU FILE EVALUATION (Continued)**

File I	File	File	File	File	IU FILE REVIEW	Reg. Cite
<b>F. SELF-MONITORING AND REPORTING</b>						
X					1. Sampled at frequency specified in control mechanism/regulation	403.12(c)&(h)
					2. TTO Requirements met	
X					a. TOMP submitted and updated (if applicable)	
X					b. TTO sample results or certification statement submitted as required	
X					3. Timely self-monitoring reports in accordance with control mechanism	403.12(c)&(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)
x					9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
NA					10. Submission/implementation of slug discharge control plan	403.8(d)(2)(v)
X					11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:



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

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

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

1. Have you made any changes to the approved program since the last inspection? (Local limits, ERP, SUO, control mechanisms, SIU list, etc.)

Yes	No
x	

If yes, discuss.

Antimony sampling added

2. Have you identified any needed changes?

Yes	No
	x

If yes, describe.

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

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] 0 %  
 If any, explain.

2. a. How many control mechanisms were allowed to expire prior to reissuance? 0  
 If any explain.

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC~II] 0  
 If any, explain.

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)(ii)]**

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 and during inspection*

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

4
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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 January 2008 to January 2009.)

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
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If any, explain.

*Galion Inc. is in SNC for not reporting.*

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

**F. ENFORCEMENT**

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

- 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)

Yes	No
X	
	X
	X
	X
X	
	X
	X
	X
	X
	X

Explain if appropriate:

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

- a. Interference
- b. Pass through
- c. Fire or explosions (flashpoint, etc.)
- d. Corrosive structural damage
- e. Flow obstructions
- f. Excessive flow rates
- g. Excessive pollutant concentrations
- h. Heat problems
- i. Interference due to O & G
- j. Toxic fumes
- k. Illicit dumping of hauled wastes
- l. Worker health and safety concerns
- m. Other (specify)

Yes	No	Explain
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		

If yes, how did you respond?

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

**F. ENFORCEMENT (continued)**

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

Yes	No
	x

**G. GENERAL OBSERVATIONS/INFORMATION ENFORCEMENT**

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

Yes	No
	x

Additional Comments/Observations/Information:

SECTION I COMPLETED BY:	<i>Michelle Sharp</i>	DATE:	<i>January 31, 2008</i>
TITLE:	<i>ESII</i>	TELEPHONE:	<i>419-373-3019</i>

### SECTION III: EVALUATION AND SUMMARY

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

C. IU CHARACTERIZATION

• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)	<i>None</i>	<i>None</i>
-----------------------------------------------------------------------	-------------	-------------

D. CONTROL MECHANISM

• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/Checklist II.D.1)	<i>None</i>	<i>None</i>
--------------------------------------------------------------------------------------------------	-------------	-------------

Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)	<i>None</i>	<i>None</i>
---------------------------------------------------------------------	-------------	-------------

Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/Checklist II.D.3&4)	<i>None</i>	<i>None</i>
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Description	Recommended Action	Required Action
<b>E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>		
<ul style="list-style-type: none"> <li>Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&amp;(iii); 403.5 /Checklist I.A)</li> </ul>	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> <li>Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&amp;3)</li> </ul>	<i>None</i>	<i>None</i>
<b>F. COMPLIANCE MONITORING</b>		
<ul style="list-style-type: none"> <li>Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&amp;(v)/Checklist I.B.1&amp;2, II.F.1)</li> </ul>	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> <li>Adequate inspections (Ref. 403.8(f)(2)(v)&amp;(vi)/Checklist I.B.1; II.F.1)</li> </ul>	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&amp;4)</li> </ul>	None	None
<ul style="list-style-type: none"> <li>Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F)</li> </ul>	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
<ul style="list-style-type: none"> <li>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)</li> </ul>	None	None

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&amp;(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b)</li> </ul>	<i>None</i>	<i>None</i>
<b>G: ENFORCEMENT</b>		
<ul style="list-style-type: none"> <li>Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1)</li> </ul>	<i>None</i>	<i>None</i>
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4)</li> </ul>	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> <li>Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&amp;5;II.G.2.c&amp;d, 5&amp;6)</li> </ul>	<i>None</i>	<i>None</i>
<b>H. DATA MANAGEMENT/PUBLIC PARTICIPATION</b>		
<ul style="list-style-type: none"> <li>Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H)</li> </ul>	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<b>I. RESOURCES</b>		
<ul style="list-style-type: none"> <li>Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)</li> </ul>	<i>None</i>	<i>None</i>
<b>J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION</b>		
<ul style="list-style-type: none"> <li>Understanding of pollutants from all sources (Checklist II.J.1&amp;2)</li> </ul>	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> <li>Documentation of environmental improvements/effectiveness (Checklist II.J.1)</li> </ul>	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> <li>Integration of pollution prevention (Checklist II.J.3,4&amp;5)</li> </ul>	<i>None</i>	<i>None</i>
K. ADDITIONAL EVALUATIONS/INFORMATION		

Description	Recommended Action	Required Action

SECTION III COMPLETED BY:	<i>Michelle Sharp</i>	DATE:	<i>January 31, 2008</i>
TITLE:	<i>ESII</i>	TELEPHONE:	<i>419-373-3019</i>

## WENDB AND RNC WORKSHEET

FACILITY INFORMATION				
Name <i>City of Galion WWTP</i>	Date of Inspection <i>December 8, 2008</i>			
OH Number <i>OH0025313</i>	NPDES Number <i>2PD00030</i>			
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	<i>4</i>	Annual	Annual	SIUS
Number of CIUs	<i>4</i>	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	<i>1</i>			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	-				