



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Crawford County  
City of Galion WWTP  
NPDES Permit

March 30, 2010

Council and City Manager  
City of Galion  
301 Harding Way East,  
Galion, OH 44833

Dear Council and City Manager:

On March 18, 2010, an inspection was conducted at the City of Galion Waste Water Treatment Plant. The inspection included a tour of the facility and a discussion about the plant's current operator of record situation. Mr. Doug Beugly and Mr. Mike Ricker were present and offered information about the plant. Our inspection findings and recommendations are summarized below.

Per the Ohio Administrative Code Section 3745-7-02 (A)(2), "*Each person owning or operating a treatment works shall designate one or more operator of record to oversee the technical operations of the treatment facility...Each operator of record shall have a valid certification of a class equal or great than the classification of the treatment works...*" In a letter dated February 4, 2010 from Mr. Daniel Kopec, of our Central Office, the City was granted a 30 day extension to find a Class III operator, with a provision that an additional 30 days would be granted if the City submitted substantial proof that they were actively seeking a Class III operator. At the time of this letter, we have not received any information from the City that they are actively searching for a Class III operator; therefore, the additional 30 days were not granted, and the plant has been operating without an official operator of record since March 5, 2010. This is a violation of your National Pollutant Discharge Elimination System (NPDES) permit.

At the time of the meeting Mr. Beugly stated that it would be November 2010 before he would be taking the test to be certified as a Class III operator. He stated that he was under the impression that the City has been granted a 60 day extension, meaning the City was in compliance until April 5, 2010. It is our understanding that there are many people changing positions within the City, but unfortunately this is not a reason for the City to be non-compliant with their NPDES permit requirements. Mr. Beugly only holds his Class II wastewater operator's license and only spends 50% of his time at the wastewater treatment plant, with the other 50% being spent at the water treatment plant.

It is our understanding that the plant is currently operating 2 shifts Sunday through Thursday and 1 shift on Friday and Saturday with a total of eight people. The people currently working at the plant are:

- Acting Superintendent (Class II wastewater license)
- Maintenance Man (Class I wastewater license)
- Lab Technician (Class 3 wastewater license)
- Crew Chief (Class 2 wastewater license)
- Operator (Class 3 wastewater license)
- Operator (Class 2 wastewater license)
- Operator (Class I wastewater license)
- Operator (Operator in training for a Class II wastewater license)

Please note that we advised the City in our June 19, 2006 letter, that they were understaffed at the wastewater plant. This letter cited the Galion Wastewater Treatment Plant Operations and Maintenance Manual prepared by Floyd Browne Associates, Limited and dated December 10, 1984, which states "The plant should be staffed 24 hrs a day, 7 days a week. This requires a minimum staff of 11." The manual also includes the following organization table:

<u>Position</u>	<u>Number</u>
Superintendent	1
Chief Operator	1
Operators	6
Laboratory Technician	1
Maintenance	1
Secretary/Assistant Lab Technician	1
Total	11

Unfortunately, at this time, we are left with no choice but to recommend enforcement action against the City for non-compliance with the operator certification rule and the NPDES permit.

At the time of the inspection all units were in operation. The mixed liquor in the aeration tanks had a healthy brown color and the plant was discharging a clear final effluent. The primary clarifiers had some scum floating on them and the secondary clarifiers had a lot of floating sludge and algae in the weirs. We were advised that sludge was floating on the clarifier due to the fact that sludge was being wasted. The influent bypass was not active.

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We were made aware of an overflow from the collection system due to an overgrowth of tree trunks in the line. Please be aware that the City should make every effort to maintain their sewer lines properly to prevent these overflows in the future.

We are in receipt of your discharge monitoring reports covering the months of April 2009 through January 2010 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are attached.

Our completed inspection report is enclosed for your records. If you have any questions, please call Michelle Sharp at (419) 373-3019.

Yours truly,



Elizabeth A. Wick, P.E.,  
Division of Surface Water

MS/lb

Enclosure

pc: ~~DSW\NWDO\Firew\enclosure~~  
Mr. Doug Beugly  
Mr. Mike Ricker

ec: Daniel A. Kopec, Ohio EPA DSW - CO

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
4/15/2009	001	00530	Total Suspended Solids	7D Qty	184	193.514
5/1/2009	001	00530	Total Suspended Solids	30D Conc	12	13.025
5/15/2009	001	00530	Total Suspended Solids	7D Conc	18	18.6
6/1/2009	001	00530	Total Suspended Solids	30D Conc	12	13.6
7/1/2009	001	00530	Total Suspended Solids	30D Conc	12	15.3285
7/8/2009	001	00530	Total Suspended Solids	7D Conc	18	21.3333
8/1/2009	001	00530	Total Suspended Solids	30D Conc	12	16.1153
8/15/2009	001	00530	Total Suspended Solids	7D Conc	18	18.5
8/22/2009	001	00530	Total Suspended Solids	7D Conc	18	19.5666
9/1/2009	001	00530	Total Suspended Solids	30D Conc	12	13.2384