



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Crawford County  
City of Galion WWTP  
Sewage Sludge Inspection

February 4, 2011

Mr. Gene Toy, City Manager  
City of Galion  
301 Harding Way East  
Galion, Ohio 44833

Dear Mr. Toy:

On January 13, 2011, Andrew Gall and Michelle Sharp conducted an inspection at the City of Galion Wastewater Treatment Plant (WWTP). The purpose of the inspection was to determine compliance with Ohio's Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. Gary Irwin was present and provided information on operations and record keeping. The inspection included a walk through the plant and a review of the sewage sludge sampling records.

Construction of the sludge treatment upgrades has been completed. Sludge is treated in two anaerobic digesters and is dewatered using two centrifuges. The centrifuged sludge is then dewatered further using a dryer system. It appeared that the wastewater treatment plant staff are still not fully trained and familiar with the operation of the upgraded sludge treatment units. Once again we urge the City to make sure that the treatment plant employees receive training on the operation and maintenance of the new sludge treatment equipment. This includes the operation of the anaerobic digester mixing system, gas holding covers, sludge pumping system, the centrifuges, polymer feed system and the sludge dryer system.

The pelletized sludge from the dryer is hauled to the Crawford County landfill for disposal. During the inspection, we discussed the sampling and testing requirements for the sewage sludge. Currently, since the sewage sludge is being hauled to the landfill the City's NPDES permit only requires that the weight of the sewage sludge being hauled to the landfill be reported on the December Discharge Monitoring Report (DMR). However, the landfill may request that the City monitor the sewage sludge as part of their requirements.

Please be aware that if in the future the City decides to begin a distribution/land application program, that there are additional record keeping requirements of Ohio's Sewage Sludge Rules that must be met before the biosolids may be distributed. A copy of Ohio's Sludge Rules can be viewed online at ([http://www.epa.state.oh.us/dsw/rules/3745\\_40.aspx](http://www.epa.state.oh.us/dsw/rules/3745_40.aspx)). If plans change, the City should submit a written report stating how the additional requirements outlined in OAC 3745-40 will be met prior to starting a distribution/land application program. Please submit this report to Mr. Andrew Gall's attention at: Ohio EPA, Northwest District Office, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402 at least 90 days prior to distributing or land applying the dried sludge. In addition, sample results showing compliance with the Class A EQ treatment requirements should be submitted with the report.

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Please respond to this letter within 30 days indicating what steps have been or will be taken to ensure that the treatment plant employees are trained on the operation and maintenance of the sludge treatment process. If you have questions regarding the sewage sludge program or this inspection letter, please contact Mr. Gall at (419) 373-3003 or via email at [andrew.gall@epa.state.oh.us](mailto:andrew.gall@epa.state.oh.us).

Sincerely,



Alex A. Smaili, P.E.  
Water Quality Engineer II / Unit Supervisor  
Division of Surface Water

AYG/cs

pc: Galion City Council  
Mr. Doug Beugly – City of Galion WWTP  
Mr. Gary Irwin – City of Galion WWTP  
~~NWDO-DSW-File~~

ec: Alex Smaili, P.E., Ohio EPA, DSW-NWDO  
Michelle Sharp, Ohio EPA, DSW-NWDO  
Chris Moody, Ohio EPA, DSW, NEDO  
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