



July 1, 2026

Transmitted Electronically

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

**Re: Galion WWTP
Inspection
NPDES
Crawford County
2PD00030**

Subject: Ohio Environmental Protection Agency NPDES Inspection

Dear Mayor and Council:

Ohio EPA's Division of Surface Water (DSW) conducted an inspection on June 3, 2026, of the City of Galion's wastewater treatment plant (WWTP) located at 6374 Hosford Road. In addition to myself, Alex Smaili and Ryan Gierhart from Ohio EPA's Northwest District Office, as well as Renee Bodkins and Scott Adkins, who represented the City of Galion, were present during the inspection.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the operation and maintenance of the plant.

Facility Description:

Galion 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. Effluent from the WWTP discharges to the Olentangy River at River Mile 85.96. The following treatment processes are utilized: influent pumping, bar screens, grit removal, primary clarifiers, pre-aeration, activated sludge with nitrification, secondary clarifiers, chlorination/dechlorination, and two polishing lagoons. The following sewage sludge treatment processes are utilized: sludge thickening, anaerobic digestion, centrifuge, and dryer. The City has 100% separated sewers. The City of Galion does have an approved pretreatment program which has 3 categorical industrial users that discharge 0.017 MGD of flow.

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. 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.

Findings:

1. Renee Bodkins, Wastewater Superintendent, began employment at the WWTP on May 11, 2026.
2. Since the last inspection, conducted on January 31, 2023, there have been forty-eight (48) permit effluent limit violations, one (1) code event, two (2) frequency violations, and one (1) sanitary sewer overflow (SSO). All the aforementioned violations occurred prior to May 2026.
 - a. The effluent limit violations are mostly for phosphorus, total suspended solids, and ammonia.
 - b. **All sanitary sewer overflows are prohibited.** The associated SSO noncompliance report was not submitted for this event.
 - c. The code events were for missing CBOD samples in October 2024.
3. Three compliance schedule milestones are overdue. These have been addressed with a scheduled timeline included in Director's Final Findings and Orders issued on November 6, 2025. The overdue milestones have resulted in the City being in significant noncompliance (SNC).
4. There have been sixteen (16) loading violations without corresponding concentration violations.
5. Smoke testing is currently underway in the collection system.
6. The top ten flows recorded are all above the peak hydraulic capacity of the plant.
7. Stormwater coverage is currently approved through the industrial multi-sector general permit (MSGP), 2GR00548. Based on the onsite evaluation, the facility appears eligible for a No Exposure (NOE) certification, which would allow termination of the MSGP.
8. A spot check of certified minimum operating staffing requirements show that the required hours were not met the week of July 14, 2025. Minimum staffing for a Class III plant is 5 days and a minimum of 40 hours per week. Only 39.5 hours were reported for the week of July 14, 2025.
9. The 2024 annual SSO report submitted on February 03, 2025, stated there were no overflows that occurred throughout the year. However, one event was reported on May 9, 2024, via electronic discharge monitoring report (eDMR).
10. Equipment awaiting service work was observed to be leaking and not utilizing drip pans.
11. A stormwater pollution prevention plan (SWP3) still has not been developed. This was a previous recommendation from the last inspection.
12. A thermometer was not located in the final composite effluent sampler.
13. The former aeration tanks were observed to contain residual material.
14. The first pump for waste activated sludge (WAS) was observed to be leaking.
15. The City currently processes sludge through the dryer prior to landfilling.

16. Filters on the aeration blowers were observed to be dirty.
17. Lagoon No. 1 experiences short-circuiting due to the proximity of the inlet and outlet. A submerged curtain was previously installed, which would limit short-circuiting, but has since sunk. It is unknown the last time this lagoon was dredged.
18. A stormwater catch basin, south of the digestors, was observed to have accumulated solids within it.

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. Noncompliance reports are required to be submitted in accordance with Part III of the NPDES permit. To assist in more timely and complete reporting, noncompliance notifications and other reports are recommended to be submitted electronically using the Division of Surface Water NPDES Permit Applications (STREAMS) service in the eBusiness center. Directions for submitting can be found at the following link: [Electronic Business Services | Ohio Environmental Protection Agency](#)
2. Submitting an NPDES permit modification application to remove the overdue schedule of compliance milestones is recommended, as these milestones are already addressed under the DFFOs. Taking this step will help the facility resolve its current SNC status.
3. Assessing inflow and infiltration in the collection system is strongly recommended to minimize the potential for regulatory violations at the wastewater treatment facility.
4. If the City can maintain complete protection of all industrial materials and activities from precipitation, we recommend that the City submits a No Exposure Certification (NOE) through the Ohio EPA eBusiness Center. If at any point the facility's operations or structures change such that industrial materials become exposed to stormwater, submit the appropriate stormwater discharge permit application. Upon approval of the NOE, terminate the existing MSGP coverage (2GR00548).
5. Minimum operator staffing requirements are recommended to be followed in accordance with OAC 3745-7-04(C)(1). Weeks are defined as Sunday through Saturday for operator hours.
6. Ensuring that all reports submitted to Ohio EPA (including eDMRs, SSO reports, and required self-monitoring records) are complete and accurate is recommended prior to submission. This includes verifying that all sampling events, analytical results, and operational data are correctly entered, that all required parameters are reported at the proper frequency, and that appropriate data substitution codes are used when samples are missed. Where discrepancies are identified, revise previously submitted reports through STREAMS or the eBusiness Center to correct the record and maintain compliance.

7. Installation of a thermometer is recommended in the final composite effluent sampler and ensure it remains in place whenever the sampler is in operation. The thermometer should be properly calibrated and maintained so that effluent temperatures can be accurately recorded in accordance with permit monitoring requirements. Regularly document sampler temperatures in the logbook to verify the sampler is consistently maintained at the required conditions.
8. Removal of all residual material is recommended from the former aeration tanks and discontinue placing contents into these structures. Once cleaned, keep these tanks out of service and ensure they are not used for storage or disposal of wastewater, sludge, or other materials. Implement routine housekeeping inspections to prevent future accumulation and to maintain proper operation and maintenance practices consistent with permit requirements.
9. Establishing and maintaining a preventative maintenance schedule is recommended which includes routine inspection, servicing, and timely repair of all treatment equipment. This schedule should specifically address the leaking WAS pump noted during the inspection, ensuring it is repaired or replaced promptly to prevent operational issues and maintain compliance.
10. Evaluation is recommended of the cost differences between drying sludge prior to landfill disposal and sending undried sludge directly to the landfill. This assessment should consider both operational and disposal expenses to determine the most cost-effective approach moving forward.
11. Cleaning or replacing the dirty filters is recommended on the aeration blowers and establishing a regular filter-maintenance schedule. Maintaining clean filters improves blower efficiency and ensures adequate aeration for biological treatment.
12. Evaluation is recommended on whether the submerged curtain in Lagoon No. 1 should be replaced to address short-circuiting between the inlet and outlet. The assessment should consider current hydraulic conditions, sludge accumulation, and whether restoring the curtain would improve plant performance.
13. Removal of accumulated solids is recommended from the stormwater catch basin located south of the digesters and include this basin in routine stormwater system maintenance. Ensuring catch basins remain clear helps prevent blockages, off-site tracking, and potential unauthorized discharges.
14. Operational issues are recommended to be discussed with our Wastewater Compliance Assistant Unit (CAU). CAU offers free technical assistance for wastewater treatment plants. Andrew Gall is the representative of your area, and he can be reached at 419.373.3003 or andrew.gall@epa.ohio.gov.

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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.

Sincerely,

A handwritten signature in black ink, appearing to be 'MS' or 'Mallorey Smith' in a stylized cursive script.

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

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cc: City of Galion
Brian Saterfield, Mayor
Thomas Fellner, Council President
Nicole Ward, Safety Service Director
Renee Bodkins, WWTP Superintendent
Crawford County Public Health
Kate Siefert, Health Commissioner
Alex Smaili, Ohio EPA-DSW
Ryan Gierhart, Ohio EPA-DSW
Andrew Gall, Ohio EPA-DSW

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING						
Permit #	NPDES #	Inspection Type	Sig. Non-Compliance	Inspection Date	Entry Time	Exit Time
OH0025313	2PD00030	CEI	No	6/3/2026	0900	1115

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Galion WWTP 6374 Hosford Road Galion, Ohio 44833	4/1/2023
	Permit Expiration Date
	3/31/2028
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Renee Bodkins, Superintendent Scott Adkins, Maintenance Mechanic	419.468.5010
Name and Title of Responsible Official	Phone Number
Nicole Ward, Safety Service Director Brian Saterfield, Mayor	419.468.1680 419.468.1857

SECTION C: AREAS EVALUATED DURING INSPECTION		
Evaluated? Y-Yes; N-No	Area Evaluated	Recommendations noted in report? Y – Yes; N – No; N/A – Not Applicable
Y	E. NPDES Compliance	Y – See recommendations 1, 2, & 6
Y	F. Operations & Maintenance	Y – See recommendations 8, 9, 11, 12, & 14
Y	G. Operator Certification	Y – See recommendations 5 & 6
Y	H. Collection System	Y – See recommendation 3
Y	I. Sludge Management	Y – See recommendation 10
Y	J. Stormwater	Y – See recommendations 4 & 13
Y	K. Self-Monitoring Program	Y – See recommendation 7
Y	L. Laboratory	N
Y	M. Effluent / Receiving Water Observations	N

Signatures	
 06/29/2026	 6/30/2026
Mallorey Smith Compliance and Enforcement Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office

Compliance Data for Galion WWTP between 1/1/2023 and 5/1/2026

Summary

Permit Effluent Limit Violations: 48
Permit Effluent Code Events: 1
Permit Effluent Frequency Violations: 2
Compliance Schedule Milestones Not Entered: 3
Reported SSO Events: 1

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2023	001	Phosphorus, Total (P)	30D Qty	10.3	12.9649	1/1/2023
February 2023	001	Oil and Grease, Hexane	1D Conc	10	140.	2/7/2023
March 2023	001	Phosphorus, Total (P)	7D Qty	15.4	18.3305	3/22/2023
June 2023	001	Total Suspended Solids	30D Conc	12	13.4666	6/1/2023
June 2023	001	Phosphorus, Total (P)	30D Conc	1.0	1.49833	6/1/2023
June 2023	001	Phosphorus, Total (P)	30D Qty	10.3	11.7624	6/1/2023
June 2023	001	Phosphorus, Total (P)	7D Conc	1.5	1.51333	6/8/2023
June 2023	001	Phosphorus, Total (P)	7D Conc	1.5	1.57333	6/15/2023
June 2023	001	Phosphorus, Total (P)	7D Conc	1.5	1.82667	6/22/2023
August 2023	001	Phosphorus, Total (P)	30D Qty	10.3	14.3212	8/1/2023
August 2023	001	Total Suspended Solids	30D Conc	12	12.6	8/1/2023
August 2023	001	Total Suspended Solids	30D Qty	123	145.558	8/1/2023
August 2023	001	Phosphorus, Total (P)	30D Conc	1.0	1.325	8/1/2023
August 2023	001	Phosphorus, Total (P)	7D Conc	1.5	1.92667	8/15/2023
August 2023	001	Phosphorus, Total (P)	7D Qty	15.4	19.1522	8/15/2023
August 2023	001	Total Suspended Solids	7D Qty	184	326.999	8/22/2023
August 2023	001	Phosphorus, Total (P)	7D Qty	15.4	24.0681	8/22/2023
October 2023	001	Phosphorus, Total (P)	30D Conc	1.0	1.22455	10/1/2023
January 2024	001	Phosphorus, Total (P)	30D Conc	1.0	1.62818	1/1/2024
January 2024	001	Phosphorus, Total (P)	30D Qty	10.3	28.2960	1/1/2024
January 2024	001	Phosphorus, Total (P)	7D Conc	1.5	4.06	1/8/2024
January 2024	001	Phosphorus, Total (P)	7D Qty	15.4	69.7012	1/8/2024
January 2024	001	Phosphorus, Total (P)	7D Qty	15.4	25.1344	1/22/2024
April 2024	001	Phosphorus, Total (P)	30D Qty	10.3	11.2820	4/1/2024
April 2024	001	Phosphorus, Total (P)	7D Qty	15.4	18.3543	4/8/2024
May 2024	001	Nitrogen, Ammonia (NH3)	30D Qty	8.2	9.5	5/1/2024
May 2024	001	Phosphorus, Total (P)	30D Qty	10.3	10.9	5/1/2024

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2024	001	Nitrogen, Ammonia (NH3)	7D Qty	12	18.	5/8/2024
May 2024	001	Phosphorus, Total (P)	7D Qty	15.4	18.6	5/8/2024
June 2024	001	Total Suspended Solids	7D Qty	184	239.	6/1/2024
September 2024	001	Phosphorus, Total (P)	30D Conc	1.0	1.5	9/1/2024
September 2024	001	Phosphorus, Total (P)	7D Conc	1.5	1.6	9/1/2024
September 2024	001	<i>E. coli</i>	7D Conc	284	409.	9/22/2024
December 2024	001	Phosphorus, Total (P)	30D Conc	1.0	1.2	12/1/2024
May 2025	001	Nitrogen, Ammonia (NH3)	7D Qty	12	14.	5/1/2025
May 2025	001	Nitrogen, Ammonia (NH3)	30D Qty	8.2	10.5	5/1/2025
August 2025	001	Phosphorus, Total (P)	30D Conc	1.0	1.1	8/1/2025
September 2025	001	<i>E. coli</i>	7D Conc	284	1194.	9/1/2025
September 2025	001	Phosphorus, Total (P)	30D Conc	1.0	1.7	9/1/2025
September 2025	001	Phosphorus, Total (P)	7D Conc	1.5	1.9	9/15/2025
September 2025	001	Phosphorus, Total (P)	7D Conc	1.5	2.1	9/22/2025
October 2025	001	Phosphorus, Total (P)	30D Conc	1.0	1.7	10/1/2025
October 2025	001	Phosphorus, Total (P)	7D Conc	1.5	2.	10/1/2025
October 2025	001	Phosphorus, Total (P)	7D Conc	1.5	1.9	10/8/2025
October 2025	001	Phosphorus, Total (P)	7D Conc	1.5	1.7	10/22/2025
December 2025	001	Phosphorus, Total (P)	7D Qty	15.4	16.5	12/15/2025
March 2026	001	pH, Minimum	1D Conc	6.5	6.3	3/6/2026
April 2026	001	Phosphorus, Total (P)	7D Qty	15.4	16.8	4/1/2026

Violations highlighted in red are all loading violations without corresponding concentration violations.

Code Events				
Reporting Period	Station	Parameter	Reported Value	Event Date
June 2024	001	<i>E. coli</i>	AK	6/6/2024

AK = biological sample too numerous to count

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2024	601	CBOD 5 day	3/Week	3	0	10/15/2024
October 2024	601	CBOD 5 day	3/Week	3	0	10/22/2024

Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
April 2025		3599	Construction	1st Report Construction Progress
April 2026		3699	Construction	2nd Report Construction Progress
April 2028		4599	Construction	End Construction

Red cells are past due milestones resulting in SNC status

Galion WWTP SSO Events			
Parameter	Units	Date	Reported Value
Overflow Occurrence	No./Month	5/9/2024	1

SSO's are prohibited.

High Flow Data for Galion WWTP between 1/1/2023 and 5/1/2026

Top 10 Flows	
Date	Flows (MGD)
4/12/2024	11.363
4/4/2026	11.310
4/1/2026	11.240
4/2/2024	11.156
1/28/2024	10.842
4/11/2024	10.417
3/27/2026	9.986
1/26/2024	9.812
4/5/2026	9.510
4/6/2025	9.059
Average	2.497

SECTION D: PERMIT VERIFICATION

	Yes	No	N/A
a. Correct name and mailing address of permittee	☒	☐	
b. Correct name and location of receiving waters	☒	☐	
c. Flows and loadings conform with NPDES permit	☐	☒	
d. Treatment processes are as described in permit application	☒	☐	
e. New treatment process added since last inspection	☐	☒	
f. Notification given to State of new, different or increased discharges	☐	☐	☒
g. All discharges are permitted	☒	☐	
h. Number and location of discharge points are as described in permit	☒	☐	☐
i. Are all stormwater discharges properly permitted?	☒	☐	
For Industrial Facilities Only			
j. Products and production rates conform with permit application?	☐	☐	☐
k. Do categorical standards apply? If yes, which ones?			

The WWTP is currently covered under MSGP No. 2GR00548. Onsite evaluation, it appears that all catch basins around industrial processes are routed to the headworks. Two catch basins, one behind garage and one by the bike path, are not routed back to the headworks. These two locations are not near industrial processes.

SECTION E: COMPLIANCE

See previous page for more compliance information.

	Yes	No	N/A
a. NPDES renewal app submitted 180 days prior to expiration	☒	☐	☐
b. Permittee has a compliance schedule	☒	☐	☐
c. Document containing compliance schedule	Admin F&Os		
d. Permittee is meeting compliance schedule	☒	☐	☐
e. Any bypasses since last inspection	☒	☐	
f. Regulatory agency notified of all bypasses	☒	☐	☐
g. Permittee or representative reporting all noncompliance per Part III of NPDES	☐	☒	☐

g. SSO noncompliance report for the event on May 9, 2024, was not submitted.

SECTION F: OPERATION AND MAINTENANCE

a. Standby power available	Generator	
b. Standby power provides power to which treatment components?	Entire plant	
c. Which treatment components have alarm system available for power or equipment failures?	Bypass valve, c-lift, screw pump has callout	
	Yes	No
d. All treatment units in service other than backup units	☒	☐
e. Routine and preventative maintenance scheduled and performed	☒	☐
f. Any major equipment breakdown since last inspection	☒	☐
g. Operation and maintenance manual provided and maintained	☒	☐
h. Any operational problems due to influent quality or quantity since last inspection	☐	☒
i. Are WWTP operations changed during high-flow events?	☒	☐
j. Does your facility accept trucked in wastewater, and if so, from what sources?	No	

a. The generator does not automatically turn on during power outages but it can be done manually.

f. The dryer was out of service due to rusting through the outer jacket and leaking heating oil. This was repaired early 2026.

g. OM provided, from 1984. Some upgrades have been made since then. Recommend to update with those elements.

i. 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. 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.

SECTION G: OPERATOR CERTIFICATION

a. Wastewater Treatment Works Classification	III		
	Yes	No	N/A
b. Operator of Record holds unexpired license of class required by Permit?	☒	☐	
c. Current Operator of Record form submitted?	☒	☐	
d. Copy certificate(s) and renewal card(s) of all professional operators displayed on-site?	☒	☐	
e. Minimum operator staffing requirements fulfilled (OAC 3745-7)	☐	☒	
f. If required (Class A or 1), are daily visits conducted by an owner's representative?	☐	☐	☒
g. If a Staffing Reduction plan has been approved, are the stipulations of the plan being met?	☐	☐	☒
h. Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred?	☐	☒	☐
i. Professional Operator of Record logbook provided?	☒	☐	
j. Logbook location	Renee's Office		
k. Logbook Format	Hardbound		
l. Has the professional Operator of Record(s) completed their electronic time submission (DMR or other option)?	Yes		
m. Do the electronic time submissions match the logbook?	Yes		
Logbook contains the following:			
n. Identification of treatment works	☒	☐	
o. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	☒	☐	
p. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)	☒	☐	
q. Laboratory results (unless documented on bench sheets)	Bench Sheets		
r. Identification of person making entries	☒	☐	

e. A spot check of certified minimum operating staffing requirements shows that the required hours were not achieved in the week of July 14, 2025. Minimum staffing for a Class III plant is 5 days and a minimum of 40 hours per week. Only 39.5 hours were reported for the week of July 14, 2025.

g. Not eligible for staffing reduction due to DFFO's.

SECTION H: COLLECTION SYSTEM

Collection System Overview

a. Which department oversees collection system operation and maintenance	WWTP responsible for pump stations Construction/sewer department under streets supervisor with no license.
b. Who is the certified operator serving as the professional Operator of Record for the collection system?	Renee Bodkins
c. Professional Operator(s) of Record holds unexpired license of class required by Permit?	Yes
d. Current Operator of Record form submitted?	Yes
e. Copy of certificate(s) and renewal card(s) of all professional operators displayed on-site?	Yes
f. Minimum operator staffing requirements fulfilled (OAC 3745-7)	Not entered prior to May 2026
g. Is there a plan for collection system maintenance? If yes, to what extent is this plan being implemented?	Unknown; as needed basis. Waiting for smoke testing to lay out a better plan. Jet/vac truck onsite.
h. Were there any major repairs or improvements to collection system since last inspection?	None
i. Name the satellite communities that discharge into your collection system	None

f. Collection system visits were not reported prior to May 2023.

Pumps and Force Mains

a. How many lift stations are within the collection system?	10
b. How many lift stations have alarms?	10
c. How many lift stations are equipped with permanent standby power or equivalent?	4

Capacity / SSOs / I&I / WIB

	Yes	No
a. Are portable pumps used to relieve the system?	☐	☒
b. Any complaints received since last inspection of basement flooding?	☐	☒
c. Have there been any SSOs since the last inspection?	☒	☐
d. What progress has been made in SSO elimination if applicable?	Unknown	
e. Are any portions of the sewer system at or near dry weather capacity? If yes, describe plans.	No	
f. Is there an inflow and infiltration reduction plan being followed? If yes, describe plans.	No	

a. Most have the availability to use portable pumps.

c. C-lift failure caused an overflow on the bike path within the last year. The associated follow-up report was not submitted.

Combined Sewer System

	Yes	No
a. Does the collection system include combined sewers?	☐	☒
Skip following questions if there are no combined sewers		
b. Are all CSOs included in your NPDES permit? If not, explain.		
c. What is the status of the LTCP implementation?		
d. If there is no LTCP, what is the status of preparation of the LTCP?		

SECTION I: SLUDGE MANAGEMENT

a. Date of last sludge inspection	January 31, 2023
b. Sludge disposal method	Landfill
c. Name of sludge disposal contractor	Kurtzman's
d. How many days of sludge storage are provided at plant?	19 days
	Yes No

e. Has amount of sludge generated changed significantly since last inspection?	☐	☒
f. Sludge records maintained for a minimum of 5 years?	☒	☐
g. Any complaints received last year regarding sludge	☐	☒
h. Is sludge adequately processed (digestion, pathogen control)	☒	☐
i. Is inadequate sludge handling causing operational problems?	☐	☒

Only one digester is in use right now.

SECTION J: STORMWATER PROGRAM - POTW

POTW Part IV, V, VI	Yes	No	N/A
a. Is design flow > 1 MGD or is facility required to have a pretreatment program?	☒	☐	
b. Are industrial materials and activities exposed to stormwater?	☐	☒	
If yes			
i. Does permit contain Parts IV, V and VI, or	☐	☒	☐
ii. Does facility have coverage under general NPDES permit for stormwater associated with industrial activity?	☒	☐	☐
If no			
i. NOE submitted within last 5 years?	☐	☒	☐
ii. Does facility meet NOE requirements? (See guidance)	☒	☐	☐

b. The facility is covered under MSGP 2GR00548 issued on February 21, 2023, and expires on May 31, 2027. Evaluation onsite determined that the WWTP meets the no exposure requirements. Staining on the pavement was observed due north of the easternmost garage bay. Leaking equipment was also noted.

Stormwater Pollution Prevention Plan (SWP3) – NOT EVALUATED	Yes	No	N/A
a. Certification statement signed & dated since most recent modification	☐	☐	
b. List current Pollution Prevention team, w/ names & SWP3 responsibilities	☐	☐	
c. Description of pollutant sources (including as applicable):	☐	☐	
i. Grit, screenings, and other solids handling, storage, or disposal areas	☐	☐	
ii. Sludge drying beds	☐	☐	
iii. Dried sludge piles	☐	☐	
iv. Compost piles	☐	☐	

Stormwater Pollution Prevention Plan (SWP3) – NOT EVALUATED	Yes	No	N/A
v. Septage or hauled waste receiving station	☐	☐	
vi. Access roads and rail lines	☐	☐	
d. Site map current with size of property, location and extent of significant structures and impervious surfaces, drainage patterns, storm sewers/catch basins/outfalls, receiving waters, BMPs, pollutant sources, locations of significant spills/leaks, material handling & storage areas, stormwater monitoring locations and location of non-stormwater discharges marked?	☐	☐	
i. Stormwater outfalls should be numbered (001, 002, etc.).	☐	☐	
ii. Must show location of grit, screenings and other solids handling, storage or disposal areas; sludge drying beds; dried sludge piles; compost piles; septage or hauled waste receiving station; and storage areas for process chemicals, petroleum products, solvents, fertilizers, herbicides and pesticides	☐	☐	
e. Inventory of all exposed materials	☐	☐	
f. List of spills and leaks	☐	☐	
g. Description of control measures, schedules, and procedures	☐	☐	
i. Minimize Exposure	☐	☐	
ii. Salt piles covered or enclosed	☐	☐	☐
iii. BMPs for material transfer areas minimize exposure	☐	☐	☐
iv. Dumpsters/roll-offs covered and/or leak proof	☐	☐	☐
v. Good Housekeeping	☐	☐	
vi. Materials orderly and labeled	☐	☐	
vii. Exposed areas clean	☐	☐	
viii. Minimize dust & offsite tracking	☐	☐	
ix. Controls for Waste, Garbage & Floatable Debris	☐	☐	
x. Permanent (Post-Construction) stormwater Management Practices	☐	☐	
xi. Sediment & Erosion Controls	☐	☐	
i. Any areas of bare soil or sparse vegetation	☐	☐	
ii. Flow dissipation devices at outfalls and along channels	☐	☐	

Stormwater Pollution Prevention Plan (SWP3) – NOT EVALUATED	Yes	No	N/A
xii. Spill Prevention and Response	☐	☐	
i. Traffic barriers/Secondary containment/Emergency shutoff switch	☐	☐	
ii. Spill response supplies & ER Hotline Number (1-800-282-9378) readily accessible and available?	☐	☐	
h. All equipment and controls maintained and repaired (including catch basins & storm sewer)	☐	☐	
i. Runoff Management: Has BMPs to divert, infiltrate, reuse, or otherwise reduce runoff	☐	☐	
j. Annual Employee Training records includes			
i. petroleum product management,	☐	☐	☐
ii. process chemical management	☐	☐	☐
iii. spill prevention and controls,	☐	☐	☐
iv. fueling procedures	☐	☐	☐
v. general good housekeeping practices	☐	☐	☐
vi. proper procedures for using fertilizer, herbicides and pesticides	☐	☐	☐
vii. Names	☐	☐	
k. Non-stormwater discharge evaluation (Must include a description of how equipment and vehicle wash water is managed. Discharges of sanitary and industrial wastewater and equipment vehicle wash water from the stormwater conveyance system are prohibited.			

A stormwater pollution prevention plan is a requirement of the MSGP.

POTW Stormwater Inspections – NOT EVALUATED	Yes	No	N/A
a. Routine facility inspections conducted quarterly?	☐	☐	
b. Quarterly visual assessment of stormwater discharge conducted?	☐	☐	☐
i. Samples taken within first 30 minutes of discharge from storm event with 72-hour or greater antecedent dry period?	☐	☐	☐
ii. If claiming substantially identical outfalls, is that accurate?	☐	☐	☐

c. Comprehensive site inspection conducted annually?	☐	☐	☐
i. Annual report completed?	☐	☐	☐

SECTION K: SELF-MONITORING PROGRAM

Flow Measurement	Yes	No
a. Actual flow discharged is measured?	☒	☐
b. Flow measurement equipment adequate to handle full range of flows	☒	☐
c. Is the primary flow measuring device calibrated at least annually or in accordance with manufacturers specifications	☒	☐
d. Date of last calibration	Not evaluated	
e. Who calibrates the flow measuring device?	Eneritech Controls Inc.	
f. Frequency of calibration	Annually	
g. How often is the flow measuring device checked for functionality?	Daily	
h. Secondary instruments operated and maintained	☒	☐

Sampling, Monitoring, and Records	Yes	No	N/A
a. Sampling location(s) are as specified by permit	☒	☐	
b. Sampling frequency agree with permit (look at compliance table for frequency violations or missing DMRs)	☐	☒	
c. Are proper sampling methods used (i.e. Oil & Grease collected in a glass container)	☒	☐	
d. Are the proper sampling types used (i.e., Grab, Composite, Flow proportionate, etc.)	☒	☐	
e. Are the field parameters (pH, DO, total residual chlorine, temperature) measured within 15 minutes of collection?	☒	☐	☐
f. Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)	☒	☐	

a. Thermometer was not present in the final effluent composite sampler.

b. CBOD samples were missing 6 times in October 2024.

SECTION L: LABORATORY – NOT EVALUATED

In-House Sampling:

Parameter	Analytical testing methods used

Quality Assurance and Quality Control – In-House Laboratory	Yes	No	N/A
a. Quality assurance manual provided and maintained?	☐	☐	
b. Does quality assurance manual contain SOPs for all sampling and analyses conducted on site?	☐	☐	
c. If alternate procedures are used, are they U.S. EPA approved?	☐	☐	☐
d. Are permit required parameters analyzed more frequently than required by the permit?	☐	☐	
i. If yes, are results recorded in permittee's e-DMR report?	☐	☐	☐

Commercial Laboratory Sampling:

Laboratory Name:

Parameter	Analytical testing methods used

Quality Assurance and Quality Control – Contract Laboratory	Yes	No	N/A
a. Does the lab participate in DMRQA or other QC programs?	☐	☐	
b. Has corrective action been taken for any parameters found unsatisfactory in the last DMRQA or water Pollution Studies?	☐	☐	☐
i. Date of last study			
ii. Parameters found unsatisfactory	☐	☐	☐
c. Has a Performance Audit Inspection (PAI) been conducted by Ohio EPA, Division of Environmental Services since the last inspection?	☐	☐	
i. If yes; have the recommendations from that PAI been implemented?	☐	☐	☐

Photograph 1 – Taken By: Malloreay Smith



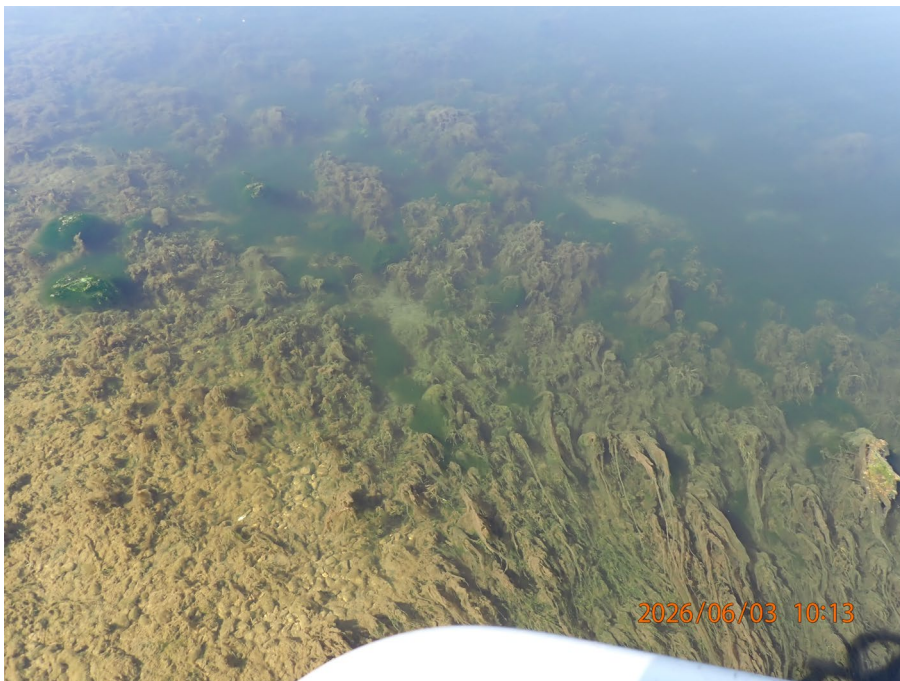
Orientation:

Facing west.

Description:

White pipe on middle the right-hand bank is inlet location while the platform the photo is taken from is the outlet

Photograph 2 – Taken By: Malloreay Smith



Description:

Sludge accumulation in Lagoon No. 1.

Photograph 3 – Taken By: Malloreay Smith



Description:
First WAS pump leaking

Photograph 4 – Taken By: Malloreay Smith



Orientation:
Facing north.

Description:
Stormwater catch basin full
of accumulated solids.

Photograph 5 – Taken By: Malloreay Smith



Description:

Accumulation of solids in stormwater catch basin shown in photograph 4.

Photograph 6 – Taken By: Malloreay Smith



Orientation:

Facing southeast.

Description:

Contents in former aeration tanks.

Photograph 7 – Taken By: Malloreay Smith



Orientation:
Facing southeast.

Description:
Pavement staining on the eastside of garage. Staining due to leaking equipment parked awaiting service.