August 14, 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 Pretreatment Audit**

Dear Mayor and Council:

On July 15 and 16, 2026, Ohio EPA conducted an Audit of the City of Galion's Approved Pretreatment Program. Myself, representing Ohio EPA - DSW, and Renee Bodkins, representing the City, were present during the full audit. Kris Barnswell and two interns, from Ohio EPA – NWDO, were also present during portions of the audit.

The Pretreatment Program was established in the Industrial Pretreatment Program document approved in 1984. The City is currently evaluating the number of industrial users (IUs). There are currently 3 known significant industrial users (SIUs) that are all categorical industrial users (CIUs). The last Pretreatment Compliance Inspection was conducted on February 7, 2024.

The purpose of the inspection was to evaluate compliance with the terms and conditions of the City of Galion's approved pretreatment program. The audit included a site visit to two categorical industrial users, a review of the sewer use ordinance (SUO), and completion of the enclosed inspection form.

Findings:

1. The City has 3 known SIUs which are all CIUs: Carter Machine Co. (Carter); Galion, LLC; and A & G Manufacturing (A&G).
2. The City hired a consultant to assist in implementing the Pretreatment Program since the last inspection due to inadequate implementation of the program. The City plans to fully implement the day-to-day operations of the pretreatment program once the new superintendent is fully trained on the pretreatment program.
3. The City has made minor modifications to the Pretreatment program since the last inspection including updating the Industrial Waste Survey (IWS), Industrial Waste Discharge Application, and Industrial Waste Discharge Permit Monitoring Report that were approved by Ohio EPA. The City also worked on updating the permit document.

4. The City has sent out the IWS to all suspected IUs to update their IU inventory and make sure all SIU are properly identified. The first round was mailed out in January 2025, with a second round being sent out in March 2026. The City has not followed up in person with the IUs that have not responded to or provided inadequate information.
5. No trucked in waste is accepted by the WWTP. The City's sewer use ordinance (SUO) has adequate requirements if the WWTP decides to accept it in the future.
6. SIUs sampling and inspections performed by the City are required to be completed at least once per year. The City has not sampled the CIUs since 2022 and has not inspected the CIUs in an indeterminate amount of time.
7. The City's last local limits technical justification update was submitted in October 2023 with no changes from the prior evaluation in 2018.
8. In 2005, updates were enacted to General Pretreatment Regulations under 40 CFR 403. A majority of them have not been implemented. Below is a list of the requirements that have not been adopted:
    a. Including slug load control requirements in the permits
    b. Immediate notification of slug load discharge or change at SIU which effects potential for a slug load
    c. Periodic Evaluation of SIUs for slug loads
    d. Significant Noncompliance (SNC) definition
    e. Best Management Practices (BMP) language requirement in permits
    f. BMP compliance information submittal requirement with periodic compliance reports
    g. BMP recordkeeping requirements
    h. Requirement to conduct representative sampling
    i. Requirements for the City to authorize a "duly authorized employee" to certify reports
9. The SUO was reviewed as part of the audit. It contains multiple deficiencies. Most of the SUO has not been updated since 1990. A detailed review can be found in the Checklist – Pretreatment Program Legal Authority Reviews. The deficiencies include, but are not limited to, the above General Pretreatment Regulations missing requirements, numerous inadequate definitions, numerous inadequate requirements for individual permits, numerous inadequate reporting requirements, missing sample collection procedures, and incorrect sharing of data requirements to government agencies.

10. Local limit parameters are listed in the SUO, however; copper is incorrectly listed as 3.2 mg/L instead of the approved 0.652 mg/L.
11. The City submitted an Enforcement Response Plan (ERP) to Ohio EPA in 1990. They City could not provide the ERP at the time of the audit. Updates were required per the 2005 General Pretreatment Regulations.
12. The City has no records of one-time compliance report submittals for dental offices.
13. A review of the CIU files showed multiple deficiencies. A detailed review of the file review for Carter and Galion, LLC can be found in Section II. An overview of CIUs are below:
    a. Carter
        i. Current permit was effective December 1, 2025
        ii. Previous permit expired January 28, 2024.
        iii. Permit renewal application was submitted May 15, 2025.
        iv. All sampling and reporting was completed
    b. A&G
        i. No current permit
        ii. Previous permit expired June 22, 2025
        iii. Application submitted March 21, 2025, but not issued.
        iv. No sampling has occurred since last inspection
    c. Galion, LLC
        i. No current permit
        ii. Previous permit expired February 1, 2022
        iii. Application was submitted May 25, 2022, but was lost by the City
        iv. Sampling has occurred, but no monitoring reports were routinely submitted. May 2026 lab results were submitted for missing information.
        v. A violation occurred January 2026 for zinc was not resampled in the required 30 days

14. The one current permit, for Carter, was issued with the updated permit document template. A review of it shows it does not include the all of the local limits sampling requirements, or the option to implement BMP and requirements. It does include all other requirements, including the updates from the 2005 General Pretreatment Regulations expect slug load requirements. Categorical limits are being applied correctly as an existing metal finisher under 40 CFR 433.15.
15. Carter performs batch discharges of 350 gallons from their pretreatment system. Carter's sampling point has been moved to after the pretreatment and prior to comingling to remove the need to apply the combined wastestream formula to the final effluent. The final effluent is combined with non-contact cooling water which is monitored to verify no contamination exists from the process wastewater. If the automated system detects contamination, it ceases discharge. The facility has a slug control plan that has not been evaluated by the City. The permit requires time-proportional composite samples; due to the low volume of batch discharge grab sampling may be more appropriate.
16. Galion, LLC and A&G permits have expired, but they are still required to monitor and report at least twice per year per 40 CFR 403.12(e)(1).
17. Galion, LLC sampling results were not routinely submitted. The contract lab analysis forms were all submitted in May 2026, when requested by the City. There was no certification statement on the submitted forms.
18. The new self-monitoring reports that have been submitted has page 1 of 1 listed instead of 1 of 3 with no indication of multiple pages. The pages reference the certification statement on page 1 of 1, making the certification appear to not be present on some pages. The template was updated to fix the error.
19. Carter does not have a Toxic Organic Management Plan (TOMP) for Total Toxic Organics (TTO), but appropriate language is included in the permit on the optional steps to take to qualify for and implementation of the certification compliance in lieu of monitoring.
20. The City does not have an updated Significant Noncompliance definition in the SUO; therefore, the City has not applied SNC to any of the CIUs nor published any SNC reports in the local newspaper. For example: if SNC was applied per Ohio Administrative Code 3745-3-3(c)(2)(h), Galion, LLC and A&G would be in SNC for failure to report for the self-monitoring requirement and would be required to be published in the newspaper.

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. **The items in bold are recommendations also included in previous inspections.**

1. **We recommend following up on all IWS that were not submitted or were incomplete, update the IU inventory once every permit cycle, and verify they are categorized correctly by the City per the SUO and Ohio Administrative Code (OAC) 3745-3-03(C)(2). Please submit the updated IU inventory to Ohio EPA upon completion.**
2. We recommend that the City performs sampling and inspection of each SIU at least once per year per OAC 3745-3-(3)(C)(2)(e).
3. **We recommend that the following are verified during inspections and the IUs are reminded that they need to report any of the following immediately: changes to the pollutants discharged, changes to the volumes discharged, changes to slug load discharge potential, and if the facility has any hazardous waste onsite per OAC 3745-3-06(H).**
4. We recommend that all of the required 2005 General Pretreatment Regulations are adopted per 40 CFR 403 and implementation of them happens as soon as possible.
5. We recommend updating the SUO deficiencies noted in Attachment C: Legal Review Checklist below.
6. We recommend correcting the copper local limit in the SUO to the approved value of 0.652 mg/L.
7. We recommend that the ERP is updated and submitted to Ohio EPA for approval per OAC 3745-3-03(C)(5).
8. We recommend that the dental offices are sent the one-time compliance report and submit them to the City and Ohio EPA per 40 CFR 441. The forms were provided to Renee Bodkins via email.
9. **We recommend ensuring that all local limits are included in the permits that have been submitted in the technical justification that was approved in 2023 per OAC 3745-3-03(C)(1)(c)(iii).**
10. **We recommend all SIUs are covered under an unexpired permit and permit renewals are processed prior to the expiration of the valid permit per 3745-3-03(C).**

11. **We recommend ensuring all SIUs are sampling and submitting their self-monitoring reports as required by the permit (or at least twice per year for CIUs per 40 CFR 403.12(e)(1) until the permit is issued) per OAC 3745-3-03(2)(d), and 3745-3-06(E)(1).**
12. Resources are available at Pretreatment Program | Ohio Environmental Protection Agency which include a US EPA Model SUO, ERP information, checklists, etc.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 419.373.3016 or email at lori.komorowski@epa.ohio.gov.

Sincerely,

Lori Komorowski

Lori Komorowski, P.E.
Environmental Engineer II
Compliance and Enforcement
Ohio EPA Division of Surface Water
Northwest District Office

Ec: Renee Bodkins, Superintendent
Brian Saterfield, Mayor
Thomas Fellner, Council President
Nicole Ward, Safety Service Director
Tom Poffenbarger, Ohio EPA-DSW
Alex Smaili, Ohio EPA-DSW
Mallorey Smith, Ohio EPA-DSW
Tony, Nosko, Ohio EPA-DSW

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Control Authority (CA) name and address	Date(s) of audit
City of Galion ***301 Harding Way East*** ***Galion, Ohio 44833***	***7/15/26-7/16/26***

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Galion WWTP	***2PD00030***	***4/1/23***	***3/31/28***	***No***

AUDITOR(S)

Name	Title/Affiliation	Telephone Number	Email Address
Lori Komorowski	***Environmental Engineer II***	***419-373-3016***	***Lori.Komorowski@epa.ohio.gov***

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
Renee Bodkins	***Superintendent***	***419-631-2570***	***ReneeBodkins@galion.city***

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	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
ICIS	Integrated Compliance Information System
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
NSCIU	Nonsignificant Categorical Industrial User
OAC	Ohio Administrative Code
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
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
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.

2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.

3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.

4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

If yes, discuss.

Yes	No
	X

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?

If yes, describe: ***Modifications to SUO were discussed with Ohio EPA back in June 2025.***

Yes	No
X	

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?

If yes, describe ***Consultant performed updates to IWS, Permit Application, Monitoring Report. Approval received August 2024.***

Yes	No
X	

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

Component	Yes	No
• Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]		*x*
• Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]		*x*
• Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]		*x*
• Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]		*x*
• SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]		*x*
• Record-keeping requirements for BMPs. [40 CFR 403.12(o)]		*x*
• Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]	*x*	
• Modifications to the sampling requirements. [40 CFR 403.12(g)]	*x*	
• Requirement to report all monitoring results. [40 CFR 403.12(g)]	*x*	

If not, when? ***Unknown***

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

Yes	No
X	

If yes, check which ones.

	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
X	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

2. a. Are there any planned changes to the POTW's treatment plant(s)?

No feasible alternative analysis is due June 2027 which may require updates.

Yes	No
	X

b. Are these changes to the treatment plant(s) due to pretreatment issues?

If yes, what were the issues?

Yes	No
	X

B. LEGAL AUTHORITY [403.8(f)(1)]

1. a. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes	No
	X

2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?

Yes	No
	X

b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW? ***N/A***

c. Did the CA update its procedures and ERP to implement the changes in its SUO?

Yes	No
	X

Explain: ***2005 General Pretreatment Regulation Changes have not been updated in the SUO, ERP updated in 1990 but was unable to be provided and would be outdated.***

3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?

Yes	No
	X

If yes, explain: ***Some of the IWS have not been returned for IUs.***

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

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?) ***Close to federal definition – missing 5% of organic capacity.***

A. All dischargers subject to categorical pretreatment standards under section 403.6 and 40 CFR chapter 1 sub chapter "N" and

B. All noncategorical dischargers that, in the opinion of the Control Authority, have a reasonable potential to adversely affect the POTW's operation, or that contribute a process wastestream which makes up five percent (5%) or more of the average dry weather flow of the POTW plant, or that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW.

C. Industrial users may be exempted from this classification with the consent of the Ohio EPA

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)] (continued)

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define middle-tier CIU? ***No***

c. If the CA has implemented the NSCIU provisions, how does the CA define NSCIU? ***No***

2. How are SIUs identified and categorized (including those in contributing jurisdictions)? ***Send out IWS – review the data that has been submitted and determine the need for a permit.***

Discuss any problems. ***Not all IWSs are being returned or returned with missing information.***

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

The City hired a consultant to perform IWS updates in 2024. A new industry would have their plans reviewed, and IWS submitted prior to accepting the flows.

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)? **Consultant sent out the IWS to all IUs in January 2025 and March 2026. It was *recommended to CA to have the IWS sent out on a routine basis.***

4. How many IUs are identified by the CA in each of the following groups?

a.	***3***		SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
		3	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
		0	Middle-tier CIUs** (specify below)
		0	Noncategorical SIUs
b.	***0***		Other regulated nonsignificant IUs (specify)
			Noncategorical nonsignificant IUs
			NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
			Zero-discharging CIUs** (specify below)
c.	***3***		TOTAL

List of NSCIUs and zero-discharging CIUs: ***N/A***

List of Middle-Tier CIUs: ***N/A***

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? _***N/A***___________

List of SIUs with general control mechanisms: ***0***

SECTION I: DATA REVIEW (CONTINUED)

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

1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]

Number	Percent
2	***66*** %

b. Has the CA implemented any general control mechanisms? ***No***

c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? ***N/A***

List the types of SIUs covered under a general control mechanism:

d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II] ***3***

If any, explain.

Carter expired on January 28, 2024. A renewal application was submitted May 15, 2025. The permit was reissued on December 1, 2025.

A&G – Expired June 22, 2025. Application submitted March 21, 2025, but not issued.

Galion, LLC – Expired February 1, 2022. Application submitted May 25, 2022.

2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA? ***No***

b. How are control mechanisms (specifically limits) developed for these facilities? ***N/A***

Discuss

	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?		***No***
b. Is any of the waste hazardous as defined by RCRA?		***N/A***
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		***N/A***

Leachate used to be accepted but was stopped prior to previous pretreatment inspection.

d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)] ***It is in the SUO, but not currently being implemented.***

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

   N/A

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

   Consultant was hired to assist in the pretreatment program. Once CA takes over, the plan is to attend trainings to stay up to date.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

   a. For what pollutants have local limits been set?

   Below table is from the SUO – Copper is incorrect it should be 0.652

Material	Concentration (mg/l)
Arsenic	0.259
Cadmium	0.242
Chromium (Total)	2.77
Chromium (Hexavalent)	0.369
Copper	3.2
Cyanide	1.2, or BMP
Lead	0.7
Mercury	0.0006, or BMP
Molybdenum	1.5
Nickel	2.592
Selenium	0.398
Silver	0.43, or BMP
Zinc	2.61

   b. How were these pollutants selected? ***Local Limits evaluation***

   c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

   NPDES permit requirements for most parameters.

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

d. Which allocation method(s) were used? ***A set limit was applied, no individual allocations.***

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits? ***Max daily limits.***

f. When was the CA's last local limits evaluation? ***The 2024 approval had no changes.***

	Yes	No
g. Has the CA identified any pollutants of concern beyond those in its local limits?	***X***	

If yes, how has this been addressed? ***Phosphorus is currently being evaluated for monitoring in permits. Recommended Galion, LLC which does phosphating.***

4. What challenges, if any, were encountered during local limits development and/or implementation?

None known

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies? ***Facilities' permit documents (expired or current) are sampling quarterly for local limits which aligns with the influent sampling of the CA. Flow and pH are daily. Inspections have not occurred since the last pretreatment inspection.***

b. Is the frequency established above more, less, or the same as required? ***Sampling performed by Galion, LLC and Carter is more frequent than the federal requirements. Inspections are less than the required frequency.***

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

No

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period ***January 1, 2025*** to ***December 31, 2025***.)

a. Not sampled or not inspected at least once [WENDB – NOIN]	***3***	***100*** %
b. Not sampled at least once [RIDE – SIUs Not Sampled]	***3***	***100*** %
c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]	***3***	***100*** %

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated). ***Actual***

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]
Not evaluated - SNC not being applied due to no SNC definition.

SNC Evaluation Period: ***January 1, 2025 – December 31, 2025***

	%	Applicable Pretreatment Standards and reporting requirements	*SNC defined by:
	%	Self-monitoring requirements	**POTW**
	%	Pretreatment compliance schedule(s)	**EPA**

Carter - sampling performed while unpermitted, permit issued December 2025, no violations

A&G – no sampling, unpermitted, should be submitting Categorical Standards 40 CFR 403.12(e)(1)

Galion, LLC – sampling performed but not submitted until May 2026, unpermitted, violation 1/26 for zinc – no 30-day resample, in compliance April

A&G and Galion LLC meets SNC per OAC 3745-3-3(c)(2)(h) definition for failure to provide self-monitoring reports as provided above.

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs. ***N/E - SNC not being applied correctly due to no SNC definition.***

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: ***January 1, 2025 – December 31, 2025***

Number of SIUs: ***1***

Names of SIUs: ***Carter***

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)] ***Inspection performed during audit showed CA reviewed processes, materials used, sampling, chemical storage, hazardous waste, facility description, and other relevant information.***

5. Who performs the CA's compliance monitoring analysis? ***Sampling has not been performed since 2022.***

	Performed by: CA/Contract Laboratory Name
• Metals	***2022 – CA collected/Alloway analyzed***
• Cyanide	***2022 – CA collected/Alloway analyzed***
• Organics	
• Other (specify)	

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]
   Check all that are applicable. ***N/E – no sampling performed since 2022.***

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves		Sample Splits	
Chain-of-custody forms		Sample Blanks	
New Sampling Tubes		Sample Spikes	
Field Blanks		Other: DMRQA	
Other:		Calibration	

7. Discuss any problems encountered in identification of sample location, collection, and analysis.
   Analysis has not been performed since November 2022.

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA? [403.12(j)&(p)] If yes, summarize.

Yes	No
	X

   b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs? ***N/E - recommended discussing during inspections.***

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]
   List SIUs required to have a slug discharge control plan: ***CA relied on self-reporting - recommended evaluation during inspections. SUO has not been updated for slug control plans***

   b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

Yes	No
	X

   If not, which SIUs have not been evaluated? All of them.

10. a. Does the IU self-monitoring reports contain a certification statement?
    Monitoring report has page 1 of 1 listed instead of 1 of 3. No indication of multiple pages, certification statement on following pages refers to page 1 of 1 making the certification appear to not be present on subsequent pages. This appears to have been fixed in the reporting template.

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]
   SNC is not defined per SUO.

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

2. ERP implementation: [403.8(f)(5)]

   a. Has the ERP been adopted by the POTW? ***Unknown, not able to provide ERP.***

   b. Has the ERP been approved by the Approval Authority? ***ERP was public noticed by Ohio EPA in 1990.***

   c. Does the ERP describe how the CA will investigate instances of noncompliance? ***Unknown***

   d. Does the ERP describe types of escalating enforcement responses and the time frames for each response? ***Unknown***

   e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response? **Unknown**

   f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements? **Unknown**

   g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available. ***No, not being implemented.***

	Yes	No
3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]		***X***
b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.		

	Yes	No
4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]		***X***

Per OAC 3745-3-3(c)(2)(h), A&G and Galion, LLC should have been published in newspaper for non-submittal SNC.

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)? ****If evaluated off of OAC 3745-3-3(c)(2)(h) definition, 2***	***0***
b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)? ****If evaluated off of OAC 3745-3-3(c)(2)(h) definition, 2***	***0***

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unknown	Explain
• Interference		***X***		
• Pass through		***X***		
• Fire or explosions (flashpoint, and such)		***X***		
• Corrosive structural damage		***X***		
• Flow obstruction		***X***		
• Excessive flow rates		***X***		
• Excessive pollutant concentrations		***X***		
• Heat problems		***X***		
• Interference due to oil and grease (O&G)		***X***		
• Toxic fumes		***X***		
• Illicit dumping of hauled wastes		***X***		
• Worker health and safety		***X***		
• Other (specify)		***X***		

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I] ***N/A***

Yes	No

7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA? ***Yes***

b. If yes, how many were due to nondomestic waste issues (O&G blockages)? ***0 – they occurred from rain***

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

Unknown if there is any – recommended storing in secure location if there is any.

2. How are requests by the public to review files handled? ***Request has to go through City Hall, information is provided and sent after review by City Hall.***

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so? ***Emailed and mailed.***

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities. ***Yes, the City has an IT consultant that manages security.***

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

SUO will be publicly released via website and social media. The Council will have to adopt it which involves public input at a meeting and is also live steamed. In addition, major modification to pretreatment programs are also public noticed by Ohio EPA.

6. Explain any public or community issues affecting the CA's pretreatment program. ***None***

7. How long are records maintained? [403.12(o)] ***More than 5 years.***

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program. ***Adding 0.5 for consultant***

Activity	FTEs	Activity	FTEs
Legal Assistance	***0***	Sample Analysis	***0.01***
Permitting	***0.02***	Data Analysis: Review and Response	***0.02***
Inspections	***0.02***	Enforcement	***0***
Sample Collection	***0.01***	Administration	***0.01***
		Total Number of FTEs	***0.58***

	Yes	No
2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.) If not, explain.	***X***	

3. a. Estimate the annual operating budget for the CA's program. $ ***50,000***

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?

Decrease – no longer rely on consultant

Discuss any changes in funding.

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

City is willing to fund.

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES [403.8(f)(3)] (continued)

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

Consultant will be utilized to assist until personal if sufficiently trained to take over operations. Personal is learning while working with consultant and Ohio EPA, training when available will be performed.

b. Does the CA have adequate reference material to implement its program?

Yes	No
X	

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times has the POTW monitored in the past year?

	Influent	Effluent	Sludge	Ambient (Receiving Water)
• Metals	***4***	***4***	***0***	***0***
• Priority pollutants	***1***	***1***	***1***	***1***
• Biomonitoring	***0***	***1***	***0***	***0***
• Toxicity Characteristic Leachate Procedure (TCLP)	***0***	***0***	***0***	***0***
• Extraction Procedure (EP) toxicity	***0***	***0***	***0***	***0***
• Other (specify)	***0***	***0***	***0***	***0***

b. Is this frequency less than, equal to, or more than that required by the NPDES permit? Explain any differences.

Less	Equal	More
	X	

c. Is the CA reporting these results to the Approval Authority?
If yes, at what frequency?
As required by NPDES permit.

Yes	No
X	

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

	Yes	No
• Improvements in POTW operations		***X***
• Loadings to and from the POTW		***X***
• NPDES permit compliance		***X***
• Sludge quality?		***X***
• Sludge disposal options?		***X***
b. Has the CA documented these findings? Explain.		***X***

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on a pollutant-by-pollutant basis. ***Has not been evaluated by current ORC.***

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes	No
	X

If yes, what was found? ***CA is capable of doing source tracing.***

	Yes	No
5. a. Has the CA implemented any kind of public education program?	*X*	
b. Are there any plans to initiate such a program to educate users about pollution prevention?		

Storm water education and other information available online.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste

Unknown

7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)? Explain.

Yes	No
	X

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION I COMPLETED BY:	**Lori Komorowski**	DATE:	***7/24/2026***
TITLE:	**Environmental Engineer II**	TELEPHONE:	***419-373-3016***

SECTION II: IU FILE EVALUATION

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 PCA should be evaluated. Make copies of this section to review additional files as necessary.

<table>
<tr><th colspan="3">IU IDENTIFICATION</th></tr>
<tr><td>FILE <u>1</u> Industry name and address
Carter Machine Co.
820 Edward St
Galion, OH 44833</td><td colspan="2">Type of industry: Hydraulic and pneumatic cylinder manufacturing including cutting, sawing, welding, machining, honing, grinding, milling, drilling, electroplating, and polishing.
SIC Code: <u>3593, 3499, 3471</u>
NAICS Code:</td></tr>
<tr><td rowspan="2">[x] CIU 40 CFR <u>433</u>
Category(ies) <u>Metal Finisher</u>
[] Other SIU [ ] Non-SIU [ ] NSCIU</td><td>Average total flow (gpd)
1940</td><td>Average process flow
1235</td></tr>
<tr><td colspan="2">Industry visited during audit Yes [x] No [ ]</td></tr>
<tr><td colspan="3">Comments</td></tr>
<tr><td>FILE <u>2</u> Industry name and address
Galion, LLC
515 N East St
Galion, OH 44833</td><td colspan="2">Type of industry: Projectiles Manufacturer, phosphating, washing
SIC Code: 3482
NAICS Code:</td></tr>
<tr><td rowspan="2">[ ] CIU 40 CFR <u>433</u>
Category(ies) <u>Metal Finisher</u>
[ ] Other SIU [ ] Non-SIU [ ] NSCIU</td><td>Average total flow (gpd)
9200</td><td>Average process flow
5700</td></tr>
<tr><td colspan="2">Industry visited during audit Yes [x] No [ ]</td></tr>
<tr><td colspan="3">Comments</td></tr>
</table>

SECTION II: IU EVALUATION (CONTINUED)

Industry Name		**INSTRUCTIONS**: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Use N for No. If the item was found to be satisfactory, enter X to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation.	
Carter Machine Co.	***Galion, LLC***		
File 1	File 2	**IU FILE REVIEW**	**Reg. Cite**
		A. ISSUANCE OF IU CONTROL MECHANISM	
X	***X1***	1. Control mechanism application form	
ND	***ND***	2. Fact sheet	
		3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X	***ND2***	a. Individual control mechanism	
N/A	***N/A***	b. General control mechanism	403.8(f)(1)(iii)(A)
		4. Control mechanism contents	403.8(f)(1)(iii)(B)
X	***ND2***	a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
X	***ND2***	b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
X3	***ND2***	c. Applicable effluent limits (local limits, categorical standards, BMPs	403.8(f)(1)(iii)(B)(3)
		d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
X3	***ND2***	• Identification of pollutants to be monitored	
X	***ND2***	• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
X	***ND2***	• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
N	***ND2***	• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
X	***ND2***	• Sampling frequency	
N	***ND2***	- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
X	***ND2***	• Sampling locations/discharge points	
X	***ND2***	• Sample types (grab or composite)	
X	***ND2***	• Reporting requirements (including all monitoring results)	
X	***ND2***	• Record-keeping requirements	

Comments

1 Previous permit application submitted May 25, 2022. New application developed in 2024.

2 Galion expired in 2022. A renewal application was submitted but was not renewed. It is currently without a permit.

3 Copper is showing incorrect local limit that is in SUO. Arsenic, Hexavalent chromium, Mercury, Molybdenum, and Selenium are not listed in the permit.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	IU FILE REVIEW	Reg. Cite
		A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
X	***ND2***	e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
NA	***ND2***	f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
X	***ND2***	g. Notice of slug loadings	403.12(f)
X	***ND2***	h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
X	***ND2***	i. Notification of significant change in discharge	403.12(j)
X	***ND2***	j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
X	***ND2***	k. 24-hour notification of violation/resample requirement	403.12(g)(2)
N/A	***ND2***	l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
NA	***NA***	5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
		a. Involve the same or similar operations	
		b. Discharge the same types of wastes	
		c. Require the same effluent limitations	
		d. Written request by the IU for coverage by a general control mechanism including:	
		• Contact information	
		• Production processes	
		• Types of waste generated	
		• Location for monitoring all wastes covered by the general permit	
		• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
		e. Documentation to support the POTW’s determination	

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	IU FILE REVIEW	Reg. Cite
		B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
X	***ND2***	1. IU categorization	403.8(f)(1)(ii)
X	***ND2***	2. Calculation and application of categorical standards	403.8(f)(1)(ii)
X	***ND2***	a. Classification by category/subcategory	
?	***ND2***	b. Classification as new/existing source	
X	***ND2***	c. Application of limits for all regulated pollutants	
NA	***NA***	d. Classification as an NSCIU	403.3(v)(2)
NA	***NA***	e. Documentation for the qualification to be classified as NSCIU	
NA	***NA***	f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
X3	***ND2***	3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
X4	***ND2***	4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA	***NA***	5. Calculation and application of production-based standards	403.6(c)
NA	***ND2***	6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
		a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
		b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
		c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
		d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
		e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
		f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
		g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
		h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
NA	***NA***	7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
		a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
		b. Documentation that dilution is not being used as treatment? (Y/N)	
NA5	***ND2***	8. Calculation and application of CWF or FWA	403.6(d)&(e)
X3	***ND2***	9. Application of most stringent limit	403.8(f)(1)(ii)

Comments

4 BMPs are not mentioned in the permit.

5 Sampling location is after pretreatment, prior to co-mingling.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	IU FILE REVIEW	Reg. Cite
		C. CA COMPLIANCE MONITORING	
X6	***X6***	1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
N/A	***N/A***	a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
		• Evaluation of discharger with the definition of NSCIU once per year	
N/A	***N/A***	b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
		• Inspect at least once every 2 years	
N6	***N6***	2. Inspection at frequency specified in approved program	403.8(c)
N6	***N6***	3. Documentation of inspection activities	403.8(f)(2)(v)
N7	***N7***	4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
X8	***X8***	5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
NA	***NA***	a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
		• Sample waived pollutant(s) at least once during the term of the control mechanism	
NA	***NA***	b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
		• Sample and analyze IU discharge at least once every 2 years	
N8	***N8***	6. Sampling at the frequency specified in approved program	403.8(c)
ND8	***ND8***	7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
ND8	***ND8***	8. Analysis for all regulated parameters	403.12(g)(1)
ND8	***ND8***	9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)

Comments

6 No inspection has occurred for an unknown amount of time.

7 Slug load evaluation has not been performed and has not been implemented.

8 Sampling has not been performed since November 2022.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	IU FILE REVIEW	Reg. Cite
		D. CA ENFORCEMENT ACTIVITIES	
		1. Identification of violations	403.8(f)(2)(vii)
		a. Discharge violations	
NA	***N9***	• IU self-monitoring	
NA7	***NA7***	• CA compliance monitoring	
		b. Monitoring/reporting violations	
		• IU self-monitoring	
NA	***N9***	– Reporting (e.g., frequency, content)	
NA	***X***	– Sampling (e.g., frequency, pollutants)	
NA	***NA***	– Record-keeping	
NA	***NA***	• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
NA10	***NA***	• Slug discharge control plan	
NA	***NA***	• Compliance schedule/reports	
NA	***NA***	c. Compliance schedule violations	
		• Start-up/final compliance	
		• Interim dates	
		2. Determination of SNC (on the basis of rolling quarters)	
NA	***NA***	a. Chronic	
NA	***NA***	b. TRC (Technical Review Criteria)	
NA	***NA***	c. Pass through/interference	
NA	***NA***	d. Spill/slug reporting load	
NA	***X11***	e. Reporting	
NA	***NA***	f. Compliance schedule	
NA	***NA***	g. Other violations (e.g., BMPs requirements)	
NA	***N12***	3. Response to violation	
NA	***N13***	4. Adherence to approved ERP	403.8(f)(5)

Comments

9 Zinc exceeded local limits without notification or follow up; original reporting was not received routinely. Sampling submitted upon request in of May 2026 for 2025-2026.

10 Has one, but not on file with CA.

11 SNC not being applied correctly due to no SNC definition. IU meets SNC OAC3745-3-3(c)(2)(h) definition for failure to provide self-monitoring reports.

12 CA not notified. IU did not retest within 30 days.

13 ERP is not able to be located and is not utilized.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	IU FILE REVIEW	Reg. Cite
		D. CA ENFORCEMENT ACTIVITIES (continued)	
		5. Return to compliance	
NA	***X13***	a. Within 90 days	
NA	***N12***	b. Within time specified	
NA	***NA***	c. Through compliance schedule	
NA	***NA***	6. Escalation of enforcement	403.8(f)(5)(ii)
NA	***N11***	7. Publication for SNC	403.8(f)(2)(viii)
		E. IU COMPLIANCE STATUS	
		1. Self-monitoring and reporting	
X	***X14***	a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
X15	***X14***	b. Analysis of all required pollutants	403.12(g)(1)&(h)
X	***X***	c. Appropriate analytical methods (40 CFR Part 136)	
X16	***X***	d. Appropriate sample collection methods	
X	***X***	e. Compliance with sample collection holding times	
ND	***ND***	f. Submission of BMR/90-day report	403.12(b) &(d)
X	***X17***	g. Periodic self monitoring reports	403.12(e)&(h)
X15	***X***	h. Reporting all required pollutants	403.12(g)(1)&(h)
X18	***N17***	i. Signatory/certification of reports	403.12(l)
NA	***NA***	j. Annual certification by NSCIUs	403.12(q)
NA	***NA***	k. Submission of compliance schedule reports by required dates	403.12(c)

Comments

13 Returned to compliance with zinc during next quarterly sampling.

14 Based on expired permit.

15 Not all parameters for local limits in permit.

16 Permit calls out a composite on a max 350 batch discharge. CA should evaluate grab only based on volume.

17 Lab analysis submitted, not on reporting template.

18 Monitoring report has page 1 of 1 listed instead of 1 of 3. No indication of multiple pages, certification statement on following pages refers to page 1 of 1 making the certification appear to not be present on subsequent pages.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	IU FILE REVIEW	Reg. Cite
		E. IU COMPLIANCE STATUS (continued)	
NA		l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
	N9	• Discharge violation	
	NA	• Slug load	
	NA	• Accidental spill	
NA	*X12*	m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
NA	*NA*	n. Notification of hazardous waste discharge	403.12(j)&(p)
X7	*NA*	o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
NA	*NA*	p. Notification of significant changes	403.12(j)
NA	*NA*	2. Compliance with all general control mechanism requirements	
NA	*NA*	3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
		• Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)	
		• Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW	
		• Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant	
NA	*NA*	4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
		• Certification statements with each compliance report	
ND	*ND*	5. Compliance with BMR requirements, if applicable (Y/N)	
NA	*NA*	6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
		• IU discharges less than 100 gpd of total categorical wastewater	
		• Annual certification statements from the IU	
NA	*NA*	7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
		• IU is effectively operating treatment technologies to achieve compliance	
		• IU is recording the facility's flow rates	
		• IU is recording the facility's production rates	
		• IU has notified the CA whenever production rates vary	
		• IU continues to employ water conservation methods/technologies	

Comments

SECTION II COMPLETED BY:	**Lori Komorowski**	DATE:	***7/16/2026***
TITLE:	**Environmental Engineer II**	TELEPHONE:	***419-373-3016***

SECTION III: OBSERVATIONS AND CONCERNS

INSTRUCTIONS: On the basis of the information and data evaluated, summarize the observations and concerns of the audit for each program element shown below. Identify all problems or deficiencies from the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
• Status of program modifications ***Minor modifications have been made to update forms. Many parts of the program are not up to date.***	403.18	I.A.1
• Modification to the program to accommodate the 2005 General Pretreatment Regulation changes ***A majority of the 2005 updates have not been updated. Including but not limited to slug load requirements, SNC definition, and BMP requirements.***	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
B. LEGAL AUTHORITY		
• Minimum legal authority requirements ***It is outdated and does not include the 2005 General Pretreatment Regulation.***	403.8(f)(1)	I.B.2&3
• Adequate multijurisdictional agreements ***N/A***	403.8(f)(1)	I.B.1&3
C. IU CHARACTERIZATION		
• Application of *significant industrial user* definition ***Close to the federal definition – missing 5% of organic capacity.***	403.3(v)(1)	I.C.1; Attach B.E.2
• Application of *middle-tier CIU* definition ***N/A***		
• Application of *NSCIU* definition ***N/A***		
• Identify and categorize IUs ***Inadequate – IWS have been sent out twice since the last inspection to update and categorize IUs. There have been facilities that have not provided responses and there has been inadequate follow-up. A&G was confirmed as a CIU for metal finishing in April 2025. No permit has been issued.***	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
D. CONTROL MECHANISM		
• Issuance of individual or general control mechanisms to all SIUs	403.8(f)(1)(iii)	I.D.1
Inadequate - 2 of the 3 CIUs are not covered under an unexpired permit.		
• Adequate control mechanisms	403.8(f)(1)(iii)(B)	II.A.4
Inadequate – missing local limits.		
• Adequate control of trucked, railed, and dedicated pipe wastes	403.5(b)(8)	I.D.2&3, E.1
Adequate - Language is in SUO, but CA is not currently accepting.		
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
• Appropriately categorize, notify, and apply all applicable pretreatment standards	403.8(f)(1)(ii)&(iii) 403.5	II.B
Inadequate – not all IUs have been categorized due to lack of response. CA has 2 CIUs with expired permits.		
• Basis and adequacy of local limits ***Adequate – all relevant parameters evaluated for and applied the most stringent results for the local limits.***	403.8(f)(4); 122.21	I.E.3&4
F. COMPLIANCE MONITORING		
• Adequate sampling and inspection frequency ***Inadequate – sampling has not been performed since 2022. Inspections have not occurred for an indetermined amount of time.***	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
• Adequate inspections	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
Inadequate - Inspections have not occurred for an indetermined amount of time.		
• Adequate sampling protocols and analysis	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9
Inadequate – sampling has not been performed since 2022.		

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
• Adequate IU self-monitoring	403.8(f)(2)(iv)	I.F.6,G.5; II.E
Inadequate – A&G has not monitored since their permit expired, regardless of permit, categorical parameters monitoring and reporting is required per 40 CFR 403.12(e)(1). Galion LLC has sampled but not reported to CA.		
• Notification of changed and hazardous waste discharges	403.12(j)&(p)	I.F.8; II.D.1.b
Not occurring – recommended to perform during inspections.		
• Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(vi)	I.F.9; II.C.4
Not occurring – recommended to perform during inspections.		
• Monitor to demonstrate continued compliance and resampling after violation(s)	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
Compliance monitoring is completed by Galion and Carter. Galion did not perform resampling with-in 30-days of a violation.		
G. ENFORCEMENT		
• Appropriate application of *significant noncompliance* definition ***Inadequate - SNC is not defined.***	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
• Develop and implement an ERP	403.8(f)(5)	I.G.2; II.D.3
ERP was public noticed by Ohio EPA in 1990. CA was unable to provide ERP and does not implement it.		
• Annually publish a list of IUs in SNC	403.8(f)(2)(viii)	I.G.4; II.D.7
Inadequate – per OAC3745-3-3(c)(2)(h) A&G and Galion, LLC should have been published in newspaper for non-submittal SNC.		
• Effective enforcement ***Inadequate – not occurring.***	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
• Effective data management/public participation ***Adequate – CA posts information their website and social media. Public meetings for SUO updates are also livestreamed.***	403.5(c)(3); 403.12(o); 403.14	I.H

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
I. RESOURCES		
• Adequate resources	403.8(f)(3)	I.I
CA has equipment and personnel to effectively resume implementation once employees are trained.		
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
• Understanding of pollutants from all sources		I.J.1&3
Knowledge of 3 CIUs and recent POTW data has not raised concerns for CA.		
• Documentation of environmental improvements/effectiveness		I.J.2
Has not been analyzed with recent data.		
• Integration of pollution prevention		I.J.6
Stormwater and general information available online.		
K. ADDITIONAL EVALUATIONS/INFORMATION		

SECTION III COMPLETED BY:	**Lori Komorowski**	DATE:	***8/7/2026***
TITLE:	**Environmental Engineer II**	TELEPHONE:	***419-373-3016***

CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: *Galion WWTP*

DATE OF REVIEW: *8/2/2026*

Note: Several changes to the National Pretreatment Regulations made as a result of the 2005 revisions to the General Pretreatment Regulations (streamlining rule, 70 FR 60134-60198: October 14, 2005) are more stringent than the previous federal requirements and therefore are considered required modifications for the POTW. Therefore, to the extent that existing POTW legal authorities are inconsistent with those required changes, they must be revised. Where local authorities are already consistent with the required provisions, further changes are not necessary.

NONE = No revision necessary REQ = Require Revision REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
A. Definitions [403.3 & 403.8(f)(2)]							
1. Act, Clean Water Act	403.3(b)	§ 1.4 A	*X*			*925.01(1)*	
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C		*X*		*925.37(b)(4)*	*"Responsible Corporate Officer" for a corporation is partially defined. Update to include correct definitions.*
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E			*X*	*925.32(h)*	*Recommend moving definition to 925.01*
4. Categorical Pretreatment Standard or Categorical Standard	403.6	§ 1.4 F			*X*	*925.01(5)*	*Does not include 40 CFR Chapter I, Subchapter N Parts 405-471 reference.*
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M	*X*			*925.01(18)*	
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL	*X*			*925.01(62)(E)*	
7. Interference	403.3(k)	§ 1.4 O	*X*			*925.01(15)*	
8. National Pretreatment Standard, Pretreatment Standard, or Standard	403.3(l)	§ 1.4 BB		*X*			*Not defined.*
9. New Source	403.3(m)	§ 1.4 T		*X*		*925.01(24)*	*403.3(m) Section 2 and 3 are not included in the definition*
10. Pass Through	403.3(p)	§ 1.4 V	*X*			*925.01(29)*	
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA		*X*			*Not defined.*
12. Publicly Owned Treatment Works or POTW	403.3(q)	§ 1.4 DD		*X*			*Not defined.*

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
13. Significant Industrial User ***[NOTE: §1.4 GG(3) is an optional streamlining provision for Nonsignificant Categorical Industrial User classification.]***	403.3(v)	§ 1.4 GG		*X*		***925.01(49)***	***Does not include organic capacity or violating a pretrement standard/requirement***
14. Significant Noncompliance	403.8(f)(2)(vii)	§ 9 (A-H)		*X*			***Not defined.***
15. Slug Load or Slug Discharge	403.8(f)(2)(vi)	§ 1.4 HH		*X*		***925.01(50)***	***Not defined correctly.***
16. Other definitions based on terms used in the POTW Ordinance							
B. National Pretreatment Standards – Prohibited Discharges							
1. General Prohibitions							
a. Interference	403.5(a)	§ 2.1A	*X*			***925.31(b)(6)***	
b. Pass Through	403.5(a)	§ 2.1A	*X*			***925.31(b)(7)***	
2. Specific Prohibitions [403.5(b)]							
a. Fire/Explosion Hazard (60 °C or 140 °F flashpoint)	403.5(b)(1)	§ 2.1B(1)	*X*			***925.31(b)(1)***	
b. pH/Corrosion	403.5(b)(2)	§ 2.1B(2)	*X*			***925.31(b)(3)***	
c. Solid or Viscous/Obstruction	403.5(b)(3)	§ 2.1B(3)	*X*			***925.31(b)(2)***	
d. Flow Rate/Concentration (BOD, etc.)	403.5(b)(4)	§ 2.1B(4)		*X*		***925.31(b)(10)***	***References a definition that is not defined correctly.***
e. Heat; exceeds 40 °C (104 °F)	403.5(b)(5)	§ 2.1B(5)	*X*			***925.31(b)(9)***	
f. Petroleum/Nonbiodegradable Cutting/Mineral Oils	403.5(b)(6)	§ 2.1B(6)	*X*			***925.32(g)***	
g. Toxic Gases/Vapor/Fumes	403.5(b)(7)	§ 2.1B(7)	*X*			***925.31(b)(5)***	
h. Trucked/Hauled Waste	403.5(b)(8)	§ 2.1B(8)	*X*			***925.66***	
3. National Categorical Standards	403.8(f)(1)(ii)	§ 2.2			*X*	***925.32***	***Does not include 40 CFR Chapter I, Subchapter N Parts 405-471 reference.***

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
4. Local Limits Development ***[NOTE: POTWs may develop Best Management Practices (BMPs) to implement the prohibitions listed in 40 CFR 403.5(a)(1). Such BMPs shall be considered local limits and Pretreatment Standards.]***	403.5(c) & (d)	§ 2.4	***X***			***925.32(c), 925.30***	
5. Prohibition Against Dilution as Treatment	403.6(d)	§ 2.6	***X***			***925.32(d)***	
6. Best Management Practices Development ***[NOTE: Optional streamlining provision.]***	403.5(c)(4)	§ 2.4C	***X***			***925.32(h)***	
C. Control Discharges to POTW System							
1. Deny/Condition New or Increased Contributions	403.8(f)(1)(i)	§§ 4.8 & 5.2	***X***			***925.34(c)***	
2. Individual Control Mechanism (e.g., permit) to ensure compliance - *Permit Content*	403.8(f)(1)(iii)	§ 4.2	***X***			***925.34(a)***	
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)		***X***		***925.36 (b)***	***Exceeds maximum of 5 years.***
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§5.2A(2)	***X***			***925.36(b)***	
c. Effluent Limits	403.8(f)(1)(B)(3)	§ 5.2A(3)	***X***			***925.36(a)***	
d. Best Management Practices ***[Note: This is a required streamlining provision for a CIU with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, this provision would be optional and is required only if the POTW has incorporated the use of BMPs (§2.4 C).]***	403.8(f)(1)(B) (3)	§ 5.2A(3)		***X***		***925.32(h)***	***Not included in 925.36.***
e. Self-Monitoring Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)	***X***			***925.36(5)***	
f. Reporting & Notification Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)	***X***			***925.36(7)***	
g. Record-Keeping Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)		***X***		***325.50***	***Not included in 925.36.***

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present ***[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]***	403.8(f)(1)(B) (4) & 403.12(e)(2)	§ 5.2A(5)					***N/A***
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B) (5)	§ 5.2A(6)		***X***		***925.99***	***Not included in 925.36.***
j. Slug Discharge Requirements (if necessary) ***[NOTE: Required streamlining change. Where the POTW has determined that slug controls are neces-sary, the ordinance must provide authority for the POTW to include such requirements in IU permits.]***	403.8(f)(1)(B) (6)	§ 5.2A(7)		***X***			***Not included in 925.36.***
k. Specific Waived Pollutant ***[NOTE: Optional streamlining provision. Required only if the POTW has incorporated §6.4B of the Model SUO.]***	403.8(f)(1)(B)(4)	§ 5.2A(8)					***N/A***
l. Permit Application/Reapplication Requirements ***[Note: Optional permit provision]***		§§ 5.3 & 5.7					***N/A***
m. Permit Modification ***[Note: Optional permit provision]***		§ 5.4					***N/A***
n. Permit Revocation/Termination ***[Note: Optional permit provision]***		§§ 5.6 & 10.8					***N/A***
o. Proper Operation and Maintenance ***[Note: Optional permit provision]***		§ 3.1					***N/A***
p. Duty of Halt/Reduce ***[Note: Optional permit provision]***		§ 10.7					***N/A***
q. Requirement to Submit Chain-of-Custody Forms with Monitoring Data ***[Note: Optional permit provision]***							***N/A***

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
D. Required Reports							
1. Develop Compliance Schedule for Installation of Technology	403.8(f)(1)(iv)	§ 5.2B(2) & 10.4	*X*			***925.41***	
2. Reporting Requirements [403.12] *Types of Reports*							
a. Baseline Monitoring Report	403.12(b)	§ 6.1		*X*		***925.35(a)***	***Needs to include existing Users subject to New categorical pretreatment standard language.***
(i) Identifying Information	403.12(b)(1)	§ 6.1B(1) & § 4.5A(1)a		*X*		***925.35(1)***	***Needs to include name of operator and owner.***
(ii) Other Environmental Permits Held	403.12(b)(2)	§§ 6.1B(1) & 4.5A(2)		*X*			***Not included.***
(iii) Description of Operations	403.12(b)(3)	§§ 6.1B(1) & 4.5A(3)a	*X*			***925.35***	
(iv) Flow Measurements	403.12(b)(4)	§§ 6.1(b)(2) & 4.5A(6)	*X*			***925.35(5)***	
(v) Measurement of Pollutants	403.12(b)(5)	§ 6.1B(2)		*X*		***925.35(3)***	***Does not include all requirements.***
(vi) Certification	403.12(b)(6)	§ 6.1B(3)			*X*	***925.35(12)***	***Recommend authorized representative instead of principal executive.***
(vii) Compliance Schedule	403.12(b)(7)	§ 6.1B(4)	*X*			***925.32(9)***	
b. Compliance Schedule Progress Report	403.12(c)	§ 6.2	*X*			***925.41(d)***	
c. Report on Compliance with Categorical Pretreatment Standard Deadline	403.12(d)	§ 6.3	*X*			***925.37(b)(6)***	***This should be moved into its own layer – i.e. (c)***

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	Part 403 Citation	Model SUO Section	REVISIONS NONE	REQ	REC	POTW Ordinance Section	Comments/Notes
d. Periodic Reports on Continued Compliance							
- From categorical users	403.12(e)	§ 6.4A		***X***		***925.37(b)(1)***	***Does not include BMP reporting requirements.***
- From significant noncategorical users	403.12(h)	§ 6.4A		***X***		***925.37(b)(1)***	***Does not include BMP reporting requirements.***
e. Notice of Potential Problems to be Reported Immediately (Including Slug Loads)	403.12(f)	§ 6.6	***X***			***925.33***	
f. Notification of Changes Affecting Potential for a Slug Discharge ***[NOTE: Required streamlining revision]***	403.8(f)(2)(vi)	§ § 6.5 & 6.6		***X***			***Not included***
g. Notice of Violation/Sampling Requirement ***[NOTE: Required streamlining revision.]***	403.12(g)(2)	§ 6.8		***X***		***925.37(b)(5)***	***This should be moved into its own layer – i.e. (c)***
h. Requirement to Conduct Representative Sampling	403.12(g)(3)	§ 6.4E		***X***			***Not included***
i. Notification of Changed Discharge	403.12(j)	§ 6.5		***X***			***Not included***
j. Notification of Discharge of Hazardous Waste	403.12(p)	§ 6.9	***X***				***Prohibited per 925.31(b)(13)***
Other Reporting Requirements							
k. Data Accuracy Certification & Authorized Signatory	403.6(a)(2)(ii) & 403.12(l)	§§ 6.4D & 6.14		***X***		***925.37(b)(4)***	***This should be moved into its own layer – i.e. (c). Does not contain certification requirements.***
l. Record-Keeping Requirement (3 years or longer)	403.12(o)	§ 6.13	***X***			***925.50***	
- Including documentation associated with Best Management Practices ***[NOTE: Required streamlining provision.]***	403.12(o)	§ 6.13		***X***			***Not included***
m. Submission of All Monitoring Data ***[NOTE: Required streamlining revision]***	403.12(g)(6)	§ 6.4F	***X***			***925.37(b)(5)***	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/ Notes
			NONE	REQ	REC		
d n. Annual Certification by Nonsignificant Categorical Industrial Users ***[Note: Optional provision, required only if the POTW has incorporated §1.4GG(3) of the Model SUO.]***	403.3(v)(2)	§§ 4.7C & 6.14B					***N/A***
o. Certification of Pollutant Not Present ***[NOTE: Optional provision, required only if the POTW has incorporated § 6.4 B of the Model SUO]***	403.12(e)(2)(v)	§ 6.14C					***N/A***
E. Test Procedures [40 CFR Part 136 & 403.12(g)]							
1. Analytical Procedures (40 CFR Part 136) ***[NOTE: Required streamlining provisions]***	403.12(g)	§ 6.10	***X***			***925.35(a)(3) 925.37(b)(2)***	
2. Sample Collection Procedures ***[NOTE: Required streamlining provisions]***	403.12(g)(3) &(4)	§ 6.11		***X***			***Not included.***
F. Inspection and Monitoring Procedures [403.8(f)]							
1. Right to Enter All Parts of the Facility at Reasonable Times	403.8(f)(1)(v)	§ 7.1	***X***			***925.39***	
2. Right to Inspect Generally for Compliance	403.8(f)(1)(v)	§ 7.1	***X***			***925.39***	
3. Right to Take Independent Samples	403.8(f)(1)(v), 403.8(f)(2)(v) & 403.8(f)(2)(vii)	§ 7.1	***X***			***925.39***	
4. Right to Require Installation of Monitoring Equipment	403.8(f)(1)(iv)	§ 7.1	***X***			***925.36(a)(4),(5)***	
5. Right to inspect and copy records	403.12(o)(2)	§ 7.1	***X***			***925.39***	
G. Remedies for Noncompliance (Enforcement) [403.8(f)(1)(vi)]							
1. Non-Emergency Response							
a. Injunctive Relief	403.8(f)(1)(vi)	§ 11.1		***X***			***Not included.***
b. Civil/criminal Penalties	403.8(f)(1)(vi)	§§ 11.2 & 11.3	***X***			***925.99***	
2. Emergency Response							
a. Immediately Halt Actual/Threatened Discharged	403.8(f)(1)(vi)(B)	§ 10.7	***X***			***925.42***	
3. Legal Authority to Enforce Enforcement Response Plan	403.8(f)(1)(vi)	§ 11.4					***Not included.***

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
H. Public Participation							
1. Publish List of Industrial Users in Significant Noncompliance ***[NOTE: Required streamlining revision]***	403.8(f)(2)(viii)	§ 9	***X***			***925.47***	
2. Access to Data [403.8(f)(1)(vii) & 403.14]							
a. Government	403.14(a) & (c)	§ 8		***X***		***925.40***	***Inaccurate. NPDES/ Pretreatment records should be provided upon request for government agencies without notification to User.***
b. Public	403.14(b)	§ 8	***X***			***925.40***	
I. Optional Provisions							
1. Net/Gross Adjustments ***[streamlining provision]***	403.15	§ 2.2 D		***X***		***925.52***	***Missing Criteria for implementation.***
2. Equivalent Mass Limits for Concentration Limits ***[streamlining provision]***	403.6(c)	§ 2.2 E					***N/A***
3. Equivalent Concentration Limits for Mass Limits ***[streamlining provision]***	403.6(c)	§ 2.2 F					***N/A***
4. Upset Notification	403.16	§ 13.1	***X***			***925.49***	
5. Waive Monitoring for Pollutant Not Present or Expected to be Present ***[streamlining provision]***	403.12(e)(2)	§ 6.4B					***N/A***
6. Reduce Periodic Compliance Reporting ***[streamlining provision]***	403.12(e)(3)	§ 6.4C					***N/A***
7. Other Special Agreement or Waivers (Excluding Wavier of National Categorical Pretreatment Standards and Requirements)							***N/A***
8. Hauled Waste Reporting/Requirements		§ 3.4	***X***			***925.66***	
9. Grease Interceptor Reporting/Requirements		§ 3.2 C					
10. Authority to Issue Notice of Violations (NOVs)		§ 10.1	***X***			***925.44***	
11. Authority to Issue Administrative Orders (AOs)			***X***			***925.45***	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
12. Authority to Issue Administrative Penalties		§ 10.6					***N/A***
13. Authority to Enforce Against Falsification or Tampering			***X***			***925.99***	
14. Any Other Supplemental Enforcement Actions as Noted in the POTW's Enforcement Response Plan							***N/A***
15. Permit Appeals Procedures			***X***			***925.48***	
16. Penalty or Enforcement Appeals Procedures			***X***			***925.48***	
17. Bypass Notification	403.17	§ 13.3					***N/A***

Document(s) submitted for review:

SUO 925 online

Name of Reviewers

Lori Komorowski

IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry ***Carter Machine Co. Inc.***	
Date of visit ***7/16/2026***	Time of visit ***10:45 AM***
Name(s) of inspector(s) Renee ***Bodkins***	
Provide name(s) and title(s) of industry representative(s).	
Name	**Title**
Annie Carter	***President***
Brian Rienhart	***Supervisor***
Classification assigned by CA: ***433 – Metal Finisher***	

Did the CA inspector review/obtain the following as part of the industrial inspection?

1. Description of the products manufactured or the services provided by the IU. ***Yes – hydraulic cylinder manufacturing***
2. Verification of the IU's classification or discussion of any changes. ***Discussion - TBD***
3. Description of any significant changes in processes or flow. ***N/A***
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.) ***Yes***
5. Description of the sample location and any differences in CA and IU locations. ***Yes – matches permit***
6. Description of the treatment system which is in place. ***Yes***
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention. ***Yes – chrome, used oil***
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems. ***Yes***

Notes: ***Information provided during inspection indicate operations have occurred prior to 1983, Metal Finishing.***

IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry: ***Galion LLC***	
Date of visit ***7/16/2026***	Time of visit: ***12:45 PM***
Name(s) of inspector(s) ***Renee Bodkins***	
Provide name(s) and title(s) of industry representative(s).	
Name	**Title**
Craig Greanya	***Maintenance Supervisor***
Classification assigned by CA: ***433 – Metal Finishing***	

Did the CA inspector review/obtain the following as part of the industrial inspection?

1. Description of the products manufactured or the services provided by the IU. ***Yes – Projectile manufacturing***
2. Verification of the IU's classification or discussion of any changes. ***Yes***
3. Description of any significant changes in processes or flow. ***Yes - N/A***
4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.) ***Yes***
5. Description of the sample location and any differences in CA and IU locations. ***Yes***
6. Description of the treatment system which is in place. ***Yes***
7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention. ***Yes***
8. Discussion regarding whether hazardous wastes are stored or discharged and any related problems. ***Yes***

Notes: ***The permit renewal application was submitted 5/25/22 but did not receive new permit.***