



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PB0003520101124

PREBLE WEST ALEXANDRIA WWTP

WARE, MAUREEN 2010/11/24

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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

**Environmental
Protection Agency**

Ed. Carciani, Governor
Lee Fisher, Lt. Governor
Chris Bertsekis, Director

November 24, 2010

Certified Mail

Mayor and Council, West Alexandria
16 North Main St.
West Alexandria, Ohio 45381

RE: Compliance Evaluation Inspection (CEI) and **Notice of Violation**
West Alexandria WWTP
Permit Number 1PB00035

Mayor and Council:

On November 18, 2010, I conducted a Compliance Evaluation Inspection at the West Alexandria Wastewater Treatment Plant (WWTP). A copy of the inspection report and General Laboratory Criteria is enclosed. The inspection report contains two unsatisfactory rating (Records/Reports and Laboratory) and two marginal ratings (Operations & Maintenance and Effluent/Receiving Water). Many of the issues causing the unsatisfactory and marginal ratings were noted in the CEI report of 11/19/09, and have yet to be addressed.

Until the pH buffers at the WWTP are replaced with unexpired buffers that bracket the expected range for the effluent pH (6.5-9.0 SU), results obtained should be considered invalid and reported as such. Similarly, as you cannot document that samples are kept at the proper temperature for preservation, any analyses conducted on samples kept in the refrigerator at the WWTP have not met the requirements of 40CFR136 and cannot be considered valid.

Please be advised that failure to comply with the requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Please submit a written response to this office by January 3, 2011 indicating the steps you have taken or intend to take to correct the above violation and unsatisfactory/marginal ratings.



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Mayor and Council, West Alexandria
November 24, 2010
Page 2

If you have any questions or comments concerning the contents of this letter, please feel free to contact me at (937) 285-6103.

Sincerely,

A handwritten signature in cursive script, appearing to read "Maureen M. Ware".

Maureen M. Ware
Division of Surface Water

cc: Chris Day
cc: Preble County Health Dept.

MW/ca



Permit #: 1PB00035
 NPDES #: OH0021598



State of Ohio Environmental Protection Agency
 Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00035	OH0021598	11/18/2010	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
West Alexandria WWTP 33 Desoto Drive West Alexandria, Ohio 45381	2:00 PM	5/1/2007
	Exit Time	Permit Expiration Date
	3:45 PM	4/30/2012
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Chris Day, Superintendent		
Name, Address and Title of Responsible Official		Phone Number
Mayor and Council PO Box 265 West Alexandria, Ohio 45381		

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	U	Laboratory	N	Compliance Schedule
M	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Records/Reports was rated as unsatisfactory due to no written or electronic violation notification. Operations & Maintenance was rated as marginal due to the ORC notification form having yet to be submitted as well as a lack of the time of arrival/departure of the ORC in the logbook. Without such information, it can not be verified that the minimum operator staffing requirements are met. The Laboratory was rated unsatisfactory due to issues noted in the General Laboratory Criteria, many of which were noted in the 11/19/09 GLC, as well as a lack of SOP's for parameters measured at the WWTP (also noted in the 11/19/09 CEI). Effluent/Receiving Waters was rated as marginal due to numerous pH violations and sludge clumps going over the clarifier weirs as well as floating latex items within the interior of one clarifier.</p>	
Inspector	Reviewer
 Maureen M. Ware Division of Surface Water Southwest District Office	 Martyn Burt Environmental Supervisor Division of Surface Water Southwest District Office
11/24/10 Date	11/24/10 Date



Sections E thru K: Complete on all inspections as appropriate
 Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... N/A

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... N
- (c) Permittee is taking actions to resolve violations..... N
- (d) Permittee has a compliance schedule..... N/A
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

Compliance history was checked from October 1, 2009 through September 30, 2010. The following violations were noted:

Date	parameter	limit (SU)	reported (SU)
6/1/09	pH	6.5	6.44
8/3/10	pH	6.5	6.31
8/4/10	pH	6.5	6.43
8/6/10	pH	6.5	6.29
8/9/10	pH	6.5	6.26
8/13/10	pH	6.5	6.3
8/17/10	pH	6.5	6.45

No notification either electronically (http://www.epa.state.oh.us/portals/35/permits/24-hour_reporting_Form4499_limits.doc or http://www.epa.state.oh.us/portals/35/permits/24-hour_reporting_Form4498_bypasses.doc) or via US Postal Service was submitted for the violations.



Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained.....

(a) Standby power available.....generator or dual feed N/E

i. What does the back-up power source operate.....

whole WWTP

ii. How often is the generator tested under load.....

every 6 months

(b) Which components have an alarm system available for power or equipment failures.....

at this time, there are no alarms. When the WWTP is upgraded, alarms will be added.

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

calendar

(e) Any major equipment breakdown since last inspection..... N

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:



Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. N
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... N/E
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met.....N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)
hardbound
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N
 - iii. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... Y
 - v. Identification of person making entries..... Y
- (k) 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..... N

Comments/Status:

The ORC notification form has yet to be submitted. Time of arrival/departure of the ORC was not noted in the logbook, and as such, it can not be verified that the minimum operator staffing requirements were fulfilled. I advised Mr. Day that the time of arrival & departure must be noted in the Operator Log Book so it can be verified that the minimum operator staffing requirements are met. Laboratory results are kept on the bench sheets.



Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....3
 - ii. How many pump stations have telemetered alarms.....0
 - iii. How many pump stations have operable alarms.....3

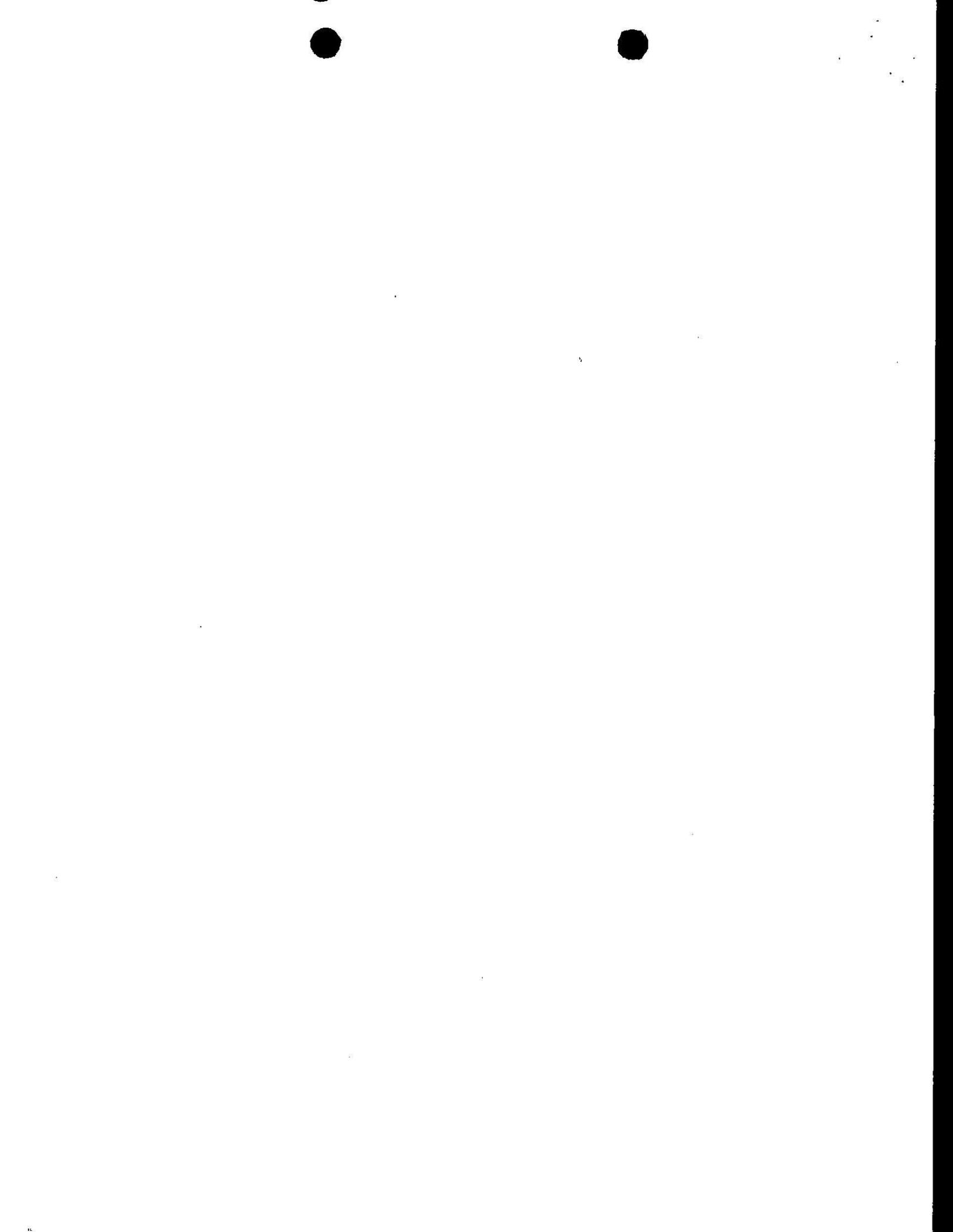
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N/A
- (d) Are there CSOs in the collection system..... N
if so, what is the LTCP status.....

- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....

- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... N
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... N/E
- (j) Is any portion of the collection system at or near dry weather capacity..... N

Comments/Status:

If a WIB call is received, it is dealt with on a case by case basis. Problem areas of the collection system are jetted out routinely to prevent basement backups.



Section H: Sludge Management

- (a) Method of Sludge Disposal...
 - Land Application
 - Haul to Another NPDES Permittee
 - Haul to a Mixed Solid Waste Landfill
- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....

30-45 days
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A
- (h) Is a contractor used for sludge disposal..... Y
If so, what is the name of the contractor.....

Mechanical Systems Dewatering

Comments/Status:

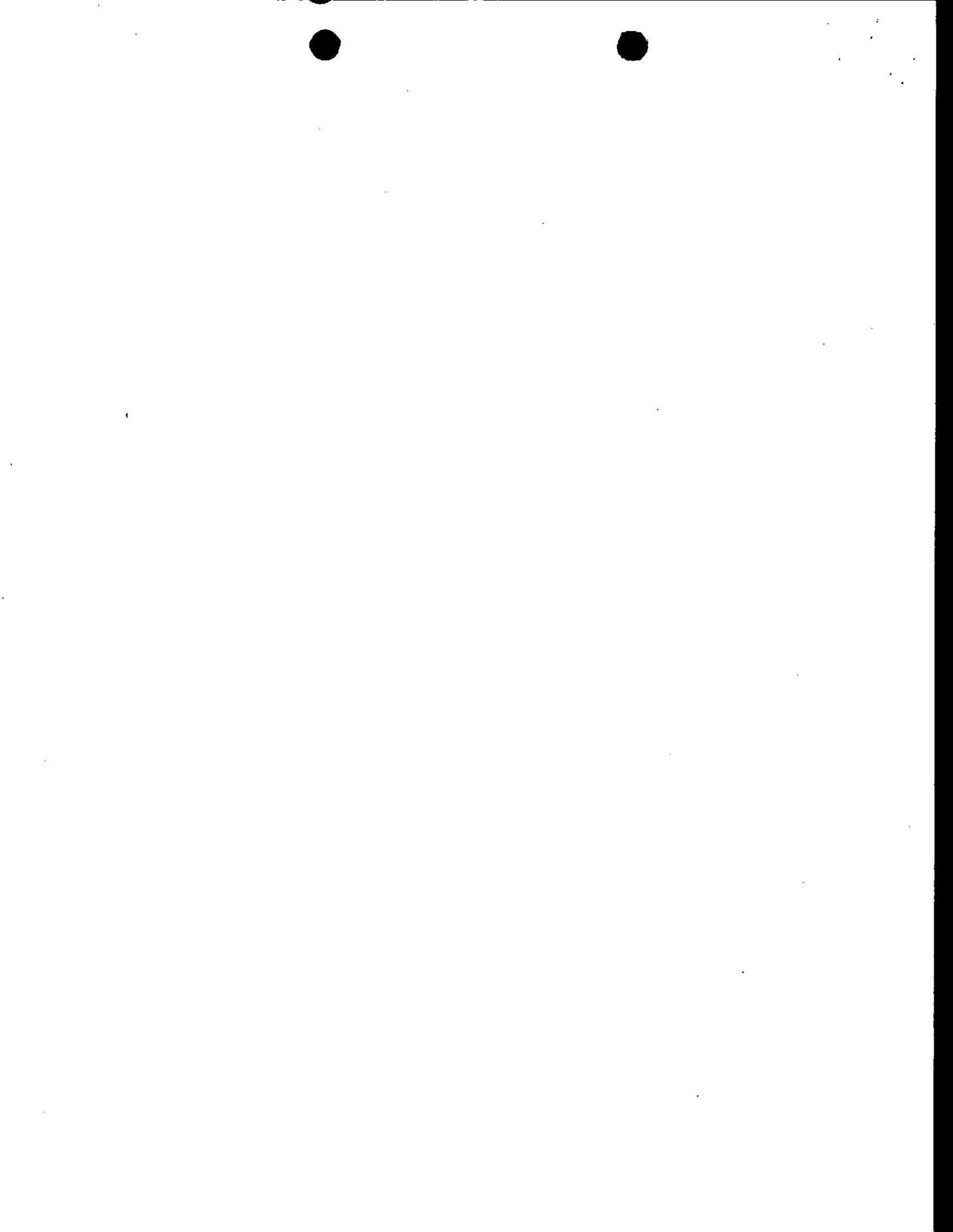
Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

ultrasonic & weir
- (b) Flow meter calibrated annually Y
(Date of last calibration: 12/9)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

Comments/Status:



Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... N/E
(see GLC)
- (d) 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)..... Y

Comments/Status:

Section I: Self-Monitoring Program (con't)

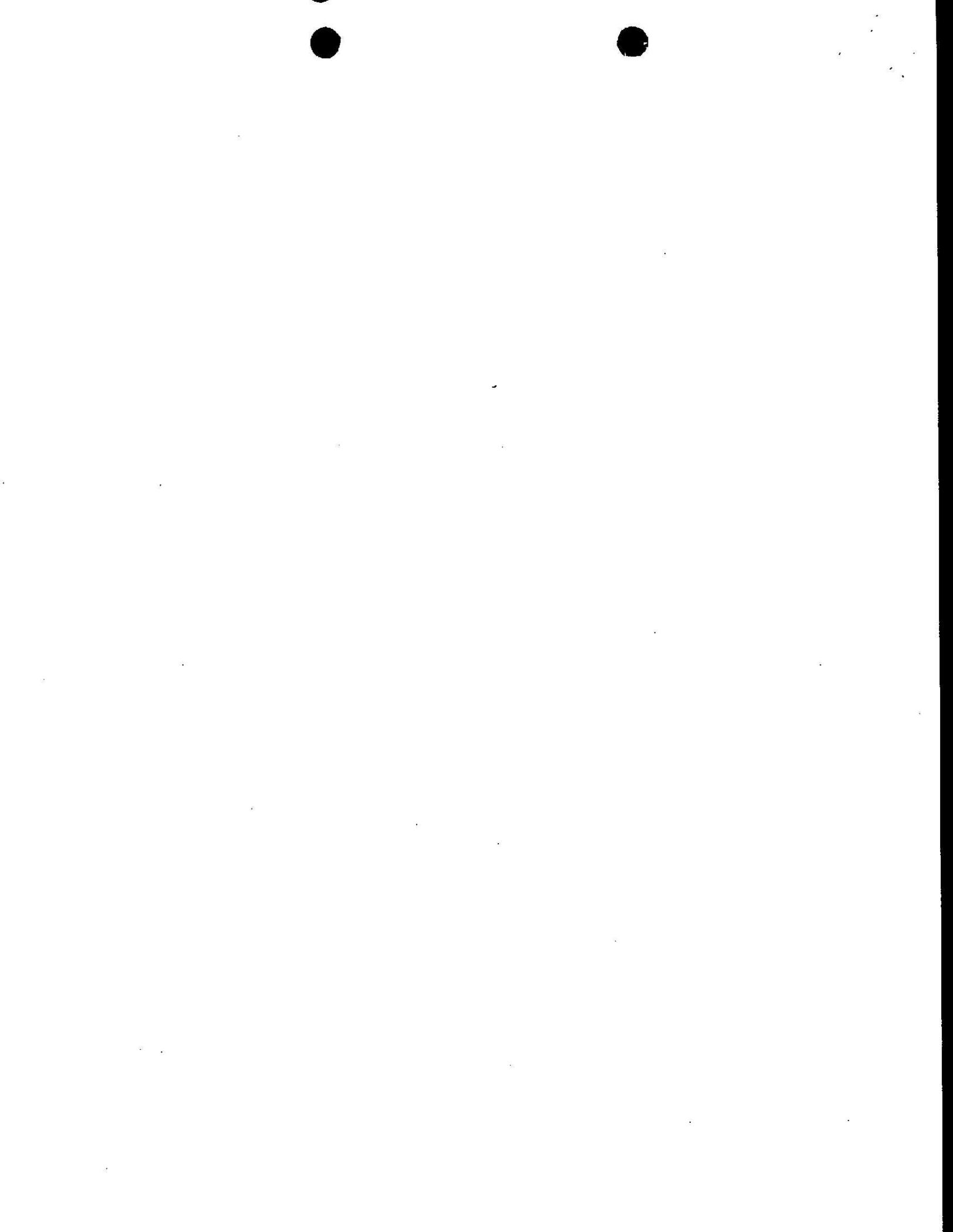
Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N
- (b) Do SOP's include the following if applicable..... N/E
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. N
- (d) If alternate analytical procedures are used, proper approval has been obtained N
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. N
(see score from GLC)



(h) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: everything except pH, D.O., Cl2, and temperature.

Lab name: Masi Labs.

Discharge Monitoring Report Quality Assurance (DMRQA)

(a) Participation in latest USEPA quality assurance performance sampling..... N/A

Date:

(b) Were any parameters "Unsatisfactory"..... N/A

(c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Pipe

Receiving Stream: Twin Creek

Receiving Stream Description: Clear

Comments/Status:

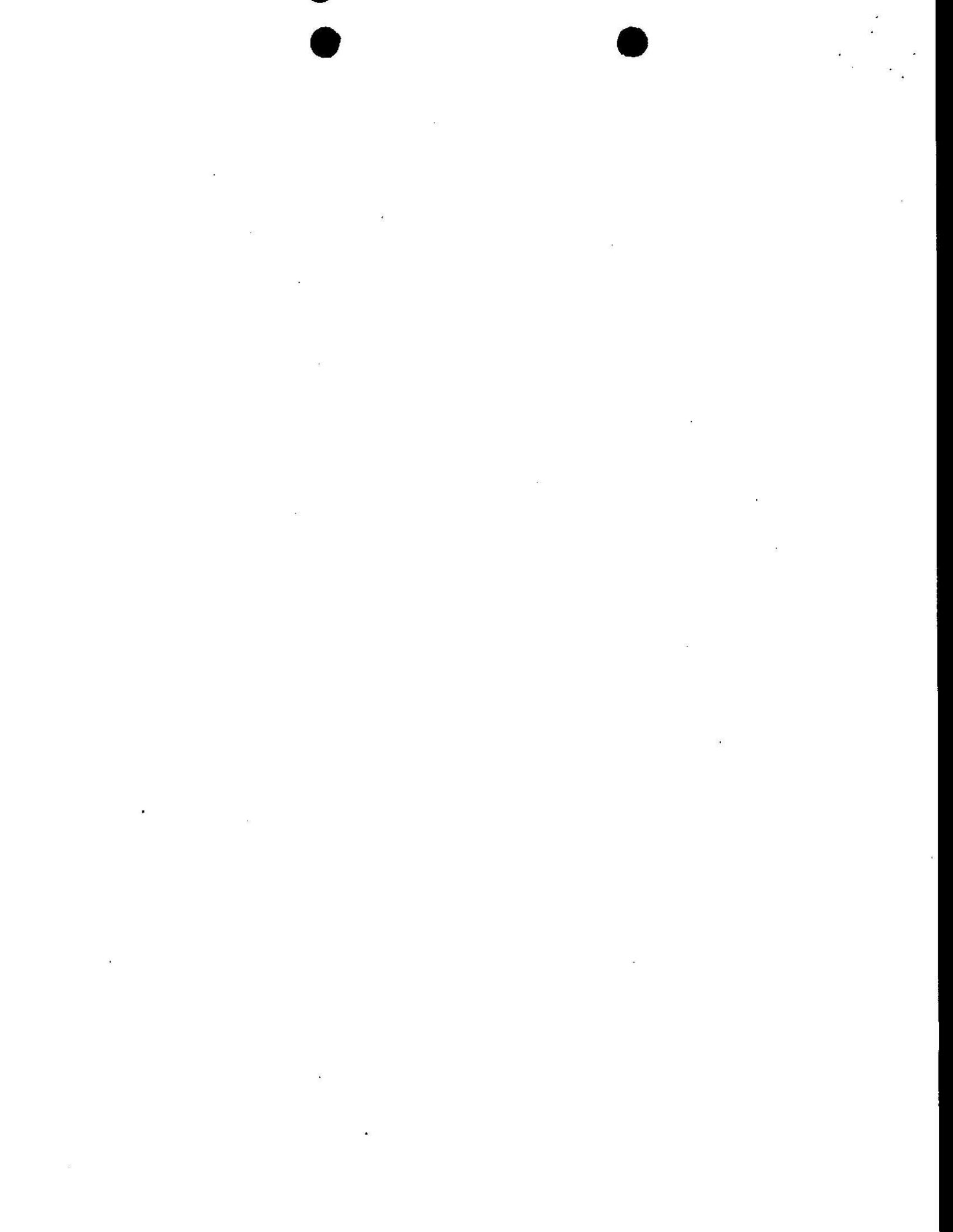
Sludge was seen going over the weirs from the clarifiers. Floating latex items were noted in the surface area of one clarifier's settling area.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?



Permit # : 1PB00035
NPDES #: OH0021598

- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

<u>Comments/Status:</u>



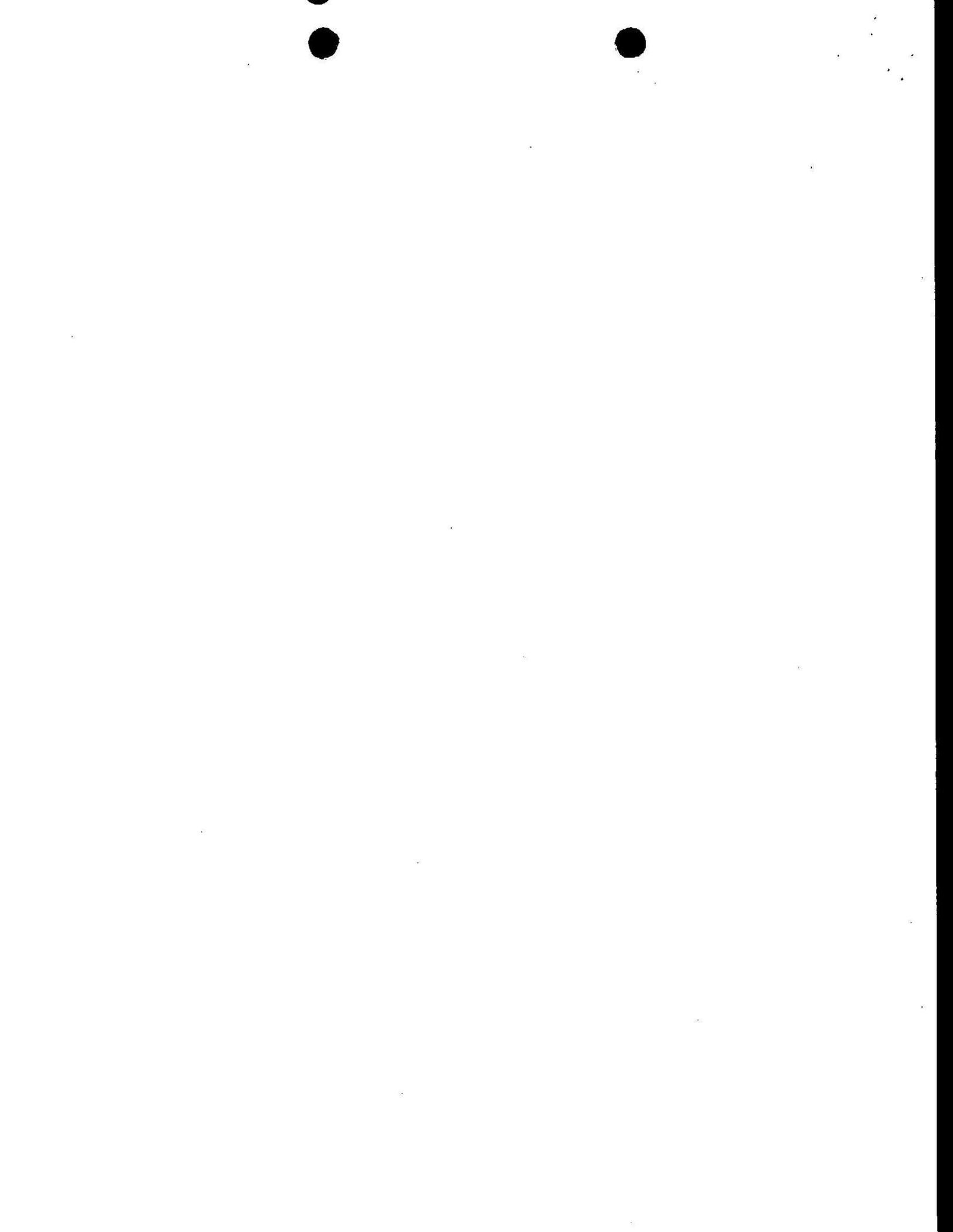
General Lab Criteri

Criteria	Standard Methods Requirement	Acceptable?		Rating
Balance		Acceptable?		
• Standard Weights	• Either NIST Class s or ASTM/ANSI Class 1 weights ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Calibration verification required at least once each day the balance is used. ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Cleanliness, air movement, vibration	• Cleanliness of balance is a must and air movement and vibration needs to be kept to a minimum ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Service and recalibrate annually (manufacturer representative or comparable) ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Must be able to measure to 0.1 grams ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: :

Criteria	Standard Methods Requirement	Acceptable?		Rating
Drying Oven (Suspended Solids)		Acceptable?		
• Temperature Recordkeeping	• Temperature recorded with each use ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2} . Correction factor posted on thermometer / equipment ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Thermometer temperature accurate to 0.5° Celsius ⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Acceptable temperature range is 103° – 105° F ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: :



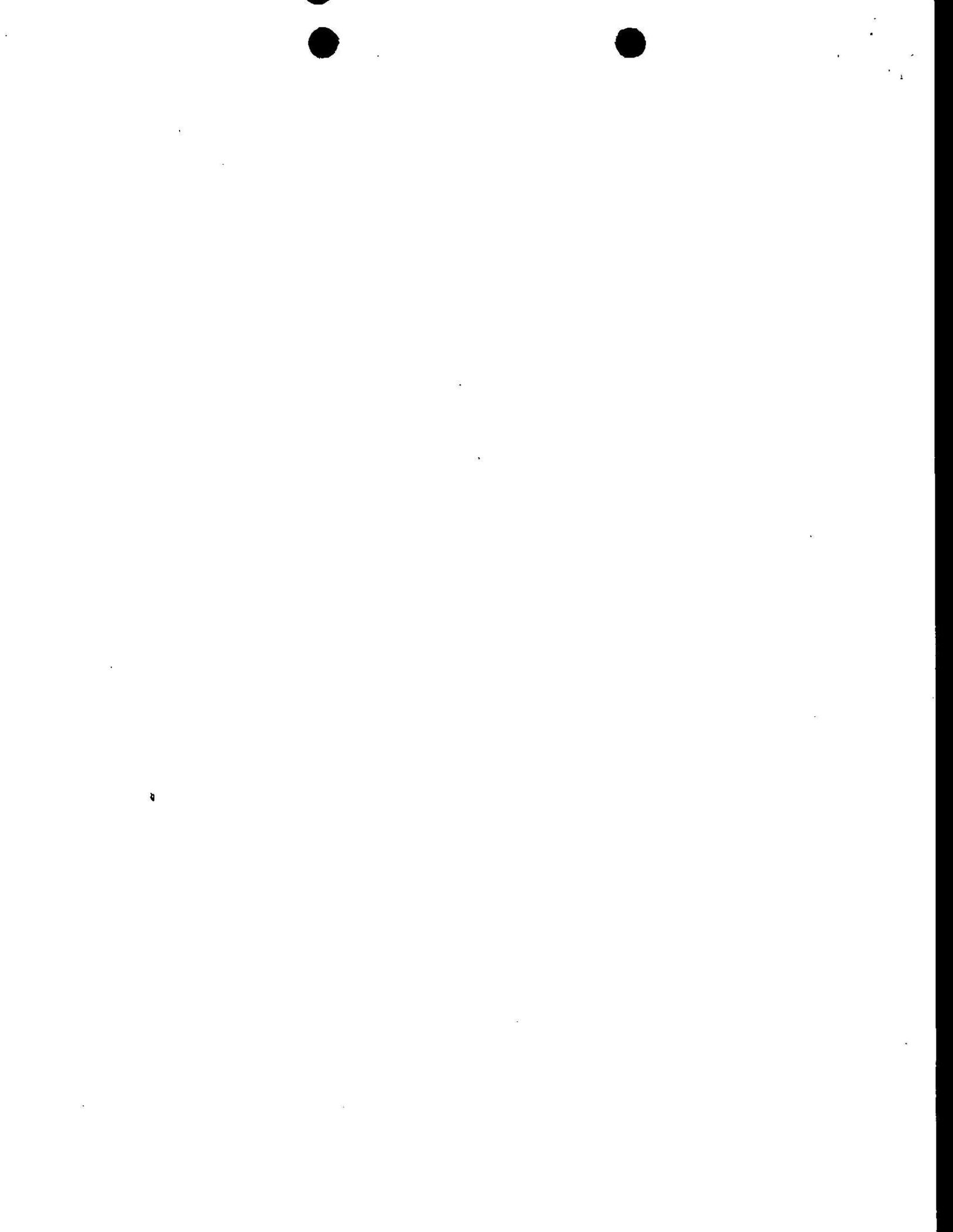
General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
pH Meter				
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	U
	• Logbook maintained ²	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
• Minimum of 2 point calibration	• Calibration per manufacturer specification and calibration buffers must bracket anticipated result ⁷	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
• Slope Documentation / Acceptability	• Slope acceptable range indicated on benchsheet ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Buffer Expiration Date	• Buffers must not be expired	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
• Other	• Instrument manual available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing ⁸	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: : Buffers used are 4 & 7. I advised Mr. Day to use 10 instead of 7, thus allowing the bracketing of anticipated results. As noted in West Alexandria's GLC report from 11/19/09, the buffers still have an expiration date of 10/08. I advised Mr. Day to obtain fresh buffers. The slope range is built into the meter. West Alexandria uses a YSI 60 meter.

Criteria	Standard Methods Requirement	Acceptable?		Rating
Dissolved Oxygen Meter				
• Calibration Method	• Air or known DO calibration method ¹⁰	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	A
	• Calibration per manufacturer specification ¹⁰	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Logbook maintained ²	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• Calibration verification required at least once each day the meter is used. ³	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Small to no bubble present under membrane (must be smaller than the lead in number 2 pencil) ¹¹	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: A logbook is still needed.



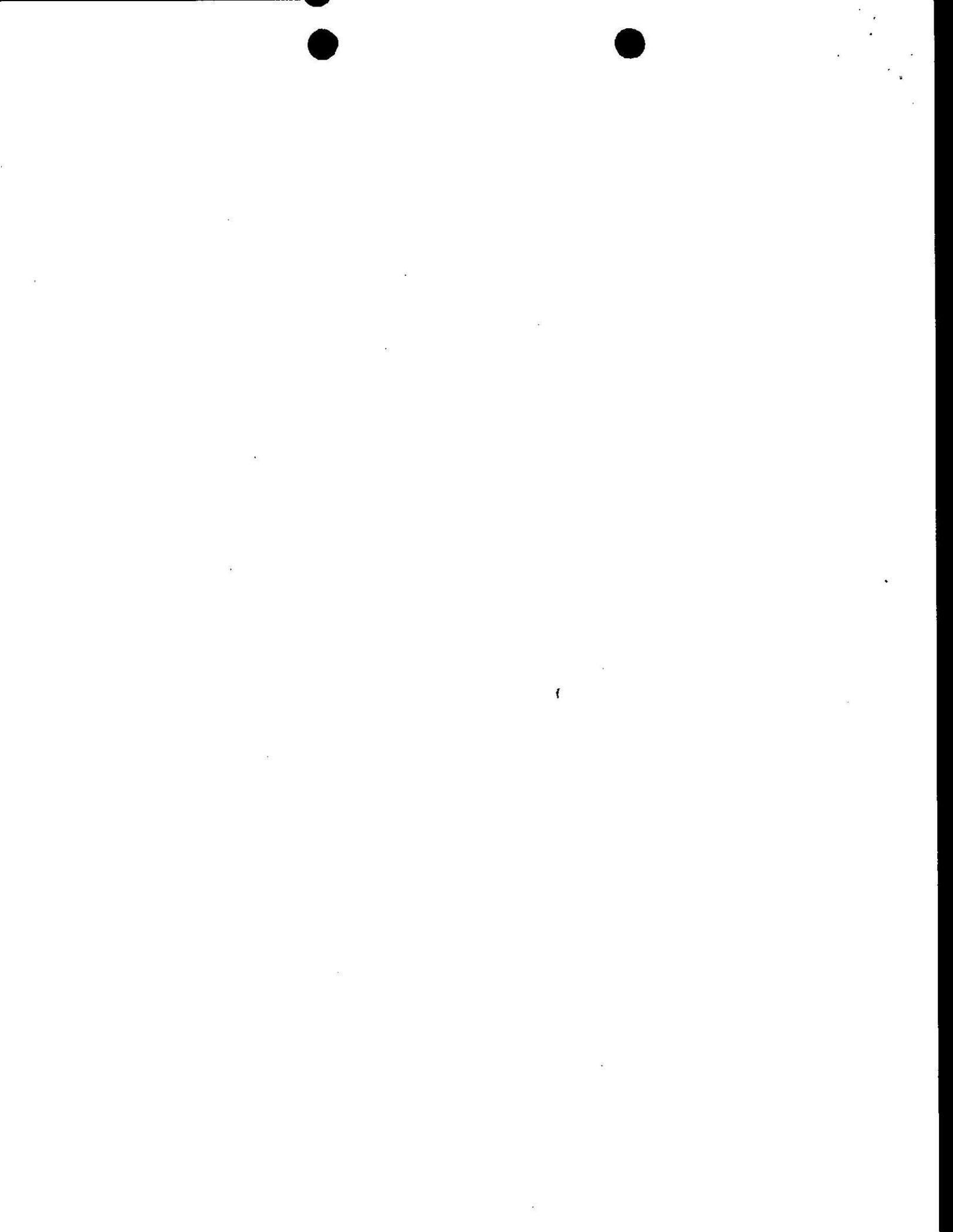
General Lab Criteria

Criteria	Standard Methods Requirement		Acceptable?	Rating
Incubator: (CBOD/E-Coli)				
• Temperature Recordkeeping	• Temperature checked / recorded twice daily for each shelf in use ¹ (E-Coli)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Temperature checked / recorded daily ² (CBOD)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Acceptable temperature range (CBOD) is 20° C ±1.0° ¹²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Acceptable temperature range (E-Coli) is 35° C ±0.5° ²²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Logbook maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Temperature correction information posted on incubator ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• E-Coli can use multiple tubes (five 20 ml or ten 10 ml), or mfg's multi-well tray	• E-coli Ultraviolet lamp (365 nm wave length, 6 W bulb) ²³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Temperature Log (thermometer accurate to 0.5 Celsius). ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: :

Criteria	Standard Methods Requirement		Acceptable?	Rating
Refrigerator				
• Temperature Recordkeeping	• Temperature Log (thermometer accurate to 0.5 Celsius). ⁵	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	U
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
• Other	• Thermometer held in water bath. ¹	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• Refrigerator temperature ≤6° Celsius. ¹³	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• Do not store volatile solvents, food, or beverages. ¹⁴	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

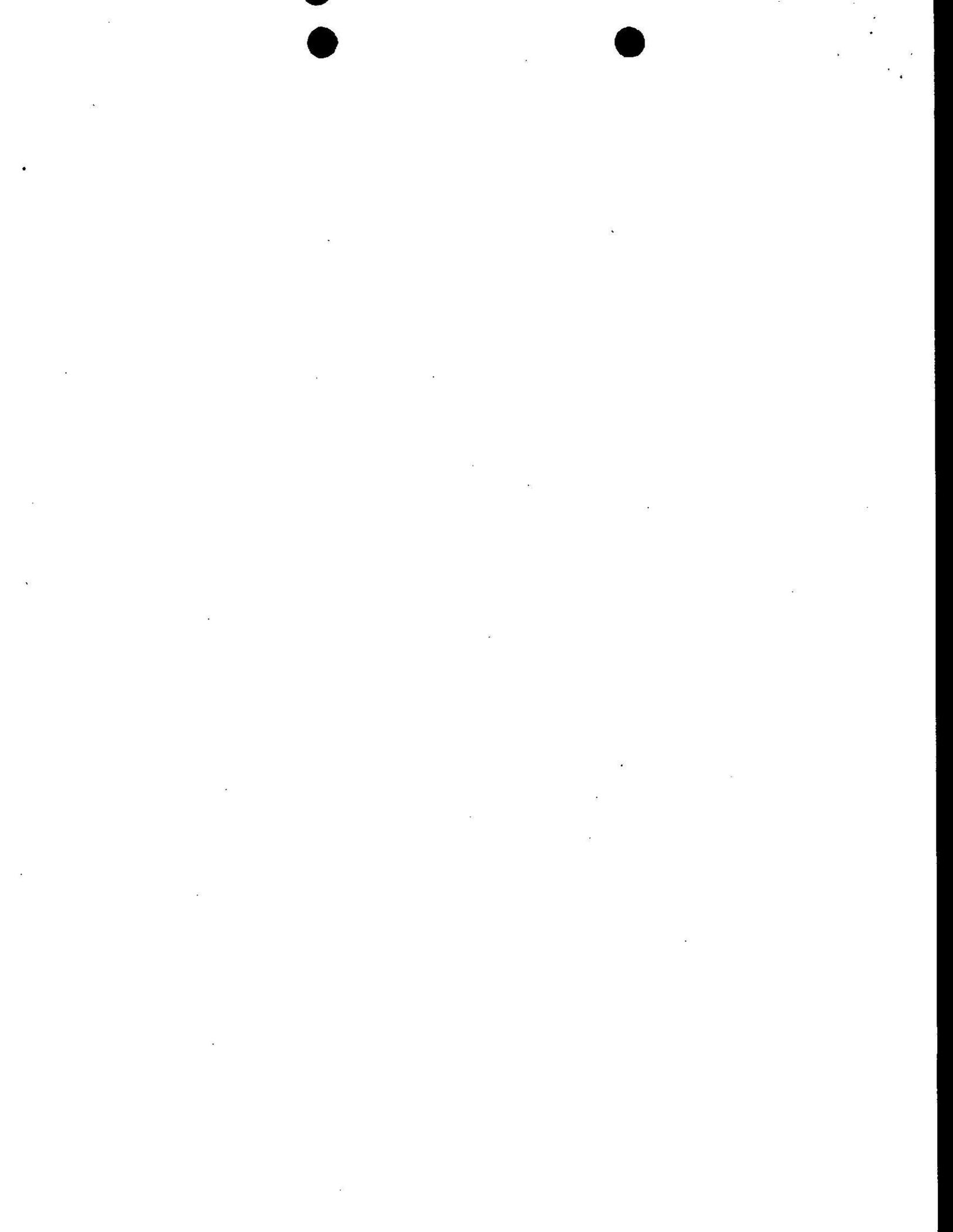
Comments: As noted in the GLC of 11/19/09, the refrigerator still lacks a thermometer. As such, the temperature in the refrigerator could not be determined.



General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Chlorine Meter				
• Calibration Frequency / Documentation	• pH / millivolt meter read to 0.1 mV ¹⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Method	• Calibration using three iodate solutions 0.2, 1.0, 5.0 milliliters or calibration per manufacturer specification ¹⁶	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Calibration curve (acceptable slope)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained. ²	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments: : West Alexandria uses a Hach Colormetric. It is kept at the WTP, along with the standards used to calibrate it, and it's manual. Currently, West Alexandria WWTP is not using the chlorine meter as the disinfection season is over.				

Criteria	Standard Methods Requirement	Acceptable?		Rating
Ammonia Meter				
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope acceptability	• Verify calibration slope is acceptable (per mfg. spec.).	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Method	• Standards used for calibration (3 ammonia solutions of 10 mg/l, 1 mg/l, and 0.1 mg/l) or per mfg. spec. ¹⁷	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing ¹⁸	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments: :				



General Lab Criteria

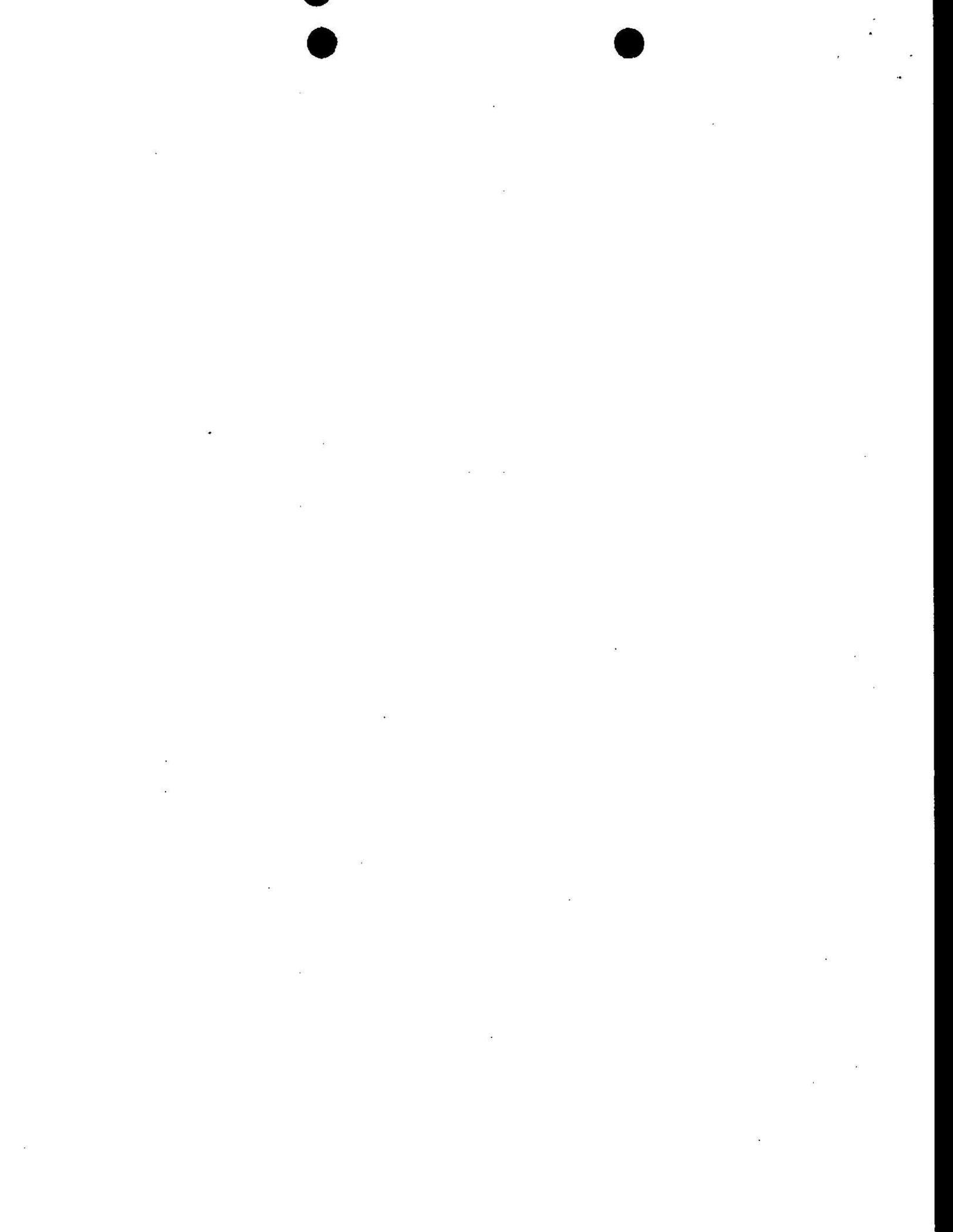
Criteria	Standard Methods Requirement		Acceptable?	Rating
Sample Collection/Handling:				
• Sample Labeling	• Samples container labeled (description, date, time, preservative added, initialed). ¹⁹	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	A
• Chain of Custody	• Chain of custody (description, date, time, signature). ¹⁹	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Composite samples refrigerated during sample collection ¹⁴	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Equipment blanks utilized ¹⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• SOP for cleaning of sampling equipment	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Logbook being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: The bottles have a description, such as NH3 on them. The rest of the required information is kept on the chain of custody sheet. A unique number for each bottle is noted on the chain of custody sheet, as well as the bottle, so effectively, the date, time, preservative, and person(s) handling the sample can be determined. The name of the person taking the sample is printed. I advised Mr. Day that the person taking the samples must sign the chain of custody. At this time, West Alexandria is using 3 grab samples in two hours, as is allowed by their current permit. I advised Mr. Day that when the permit renews, West Alexandria will be required to use a flow proportional autosampler. The autosampler will need to have an SOP for cleaning it, as well as equipment blanks used to determine if the cleaning was adequate. A log book of the autosampler maintenance/cleaning will need to be kept after the permit renews.

Criteria	Standard Methods Requirement		Acceptable?	Rating
Desiccator:				
• General criteria	• Properly working seals.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Desiccant fresh (blue color)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Documentation	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement		Acceptable?	Rating
Bench sheets				
• General criteria	• Date(s) ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	A
	• Analyst initials ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Blue or black ink pen ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration information ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

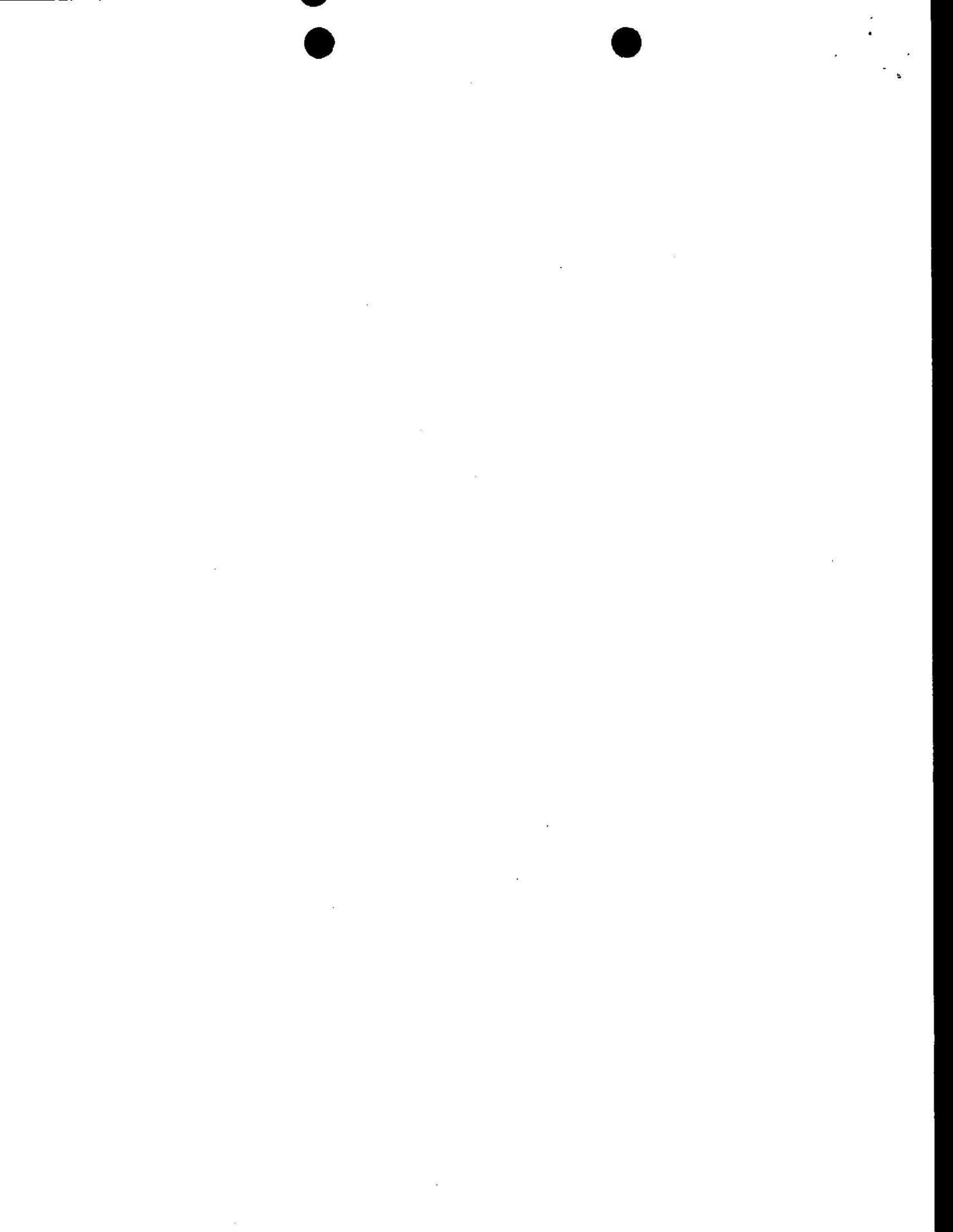


General Lab Criteria

	<ul style="list-style-type: none"> • Equations, calculations, units for all measurements, notations, and results present² 	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Corrections, single line through, initialed and dated² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments:				

Criteria	Standard Methods Requirement	Acceptable?		Rating
Hot Water Bath (Fecal Coliform/E. Coli)				
• Temperature Recordkeeping	• Temperature Log (thermometer accurate to 0.2° C) ²¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Incubator temperature 44.5° C ± 0.2° ^{21/24}			
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Water Level	• Thermometer total immersion or partial (line on thermometer to ID immersion depth) ^{1,5}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments:				

Criteria	Standard Methods Requirement	Acceptable?		Rating
Autoclaves/Steam Sterilizers				
• All apparatus utilized is adequately sterilized before use	• Sterilizing temperature 121° C ²⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• 10 to 30 minutes time based on material being sterilized ²⁶	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Documentation	• Verify the autoclave temperature weekly by using a maximum registering thermometer (MRT) to confirm that 121°C has been reached as measured in the exhaust. ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Date, contents, sterilization time and temperature, total time in autoclave, and analyst's initials should be recorded each time the autoclave is used ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Performance Checks	• Test monthly for efficacy using a biological such as commercially available <i>Geobacillus stearothermophilus</i> in spore strips, suspensions, or capsules ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	



General Lab Criteria

Comments:

Criteria	Standard Methods Requirement	Acceptable?	Rating
• General Criteria	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	M
	• Thermometer accurate to 0.1° Celsius ⁵	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Comments:

Number of Criteria Rated:

Acceptable	3
Marginal	1
Unacceptable	2
Total Number of Areas Rated	6

Acceptable Ratings – No action required (recommend SOP's written or updated, perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, written response not required).

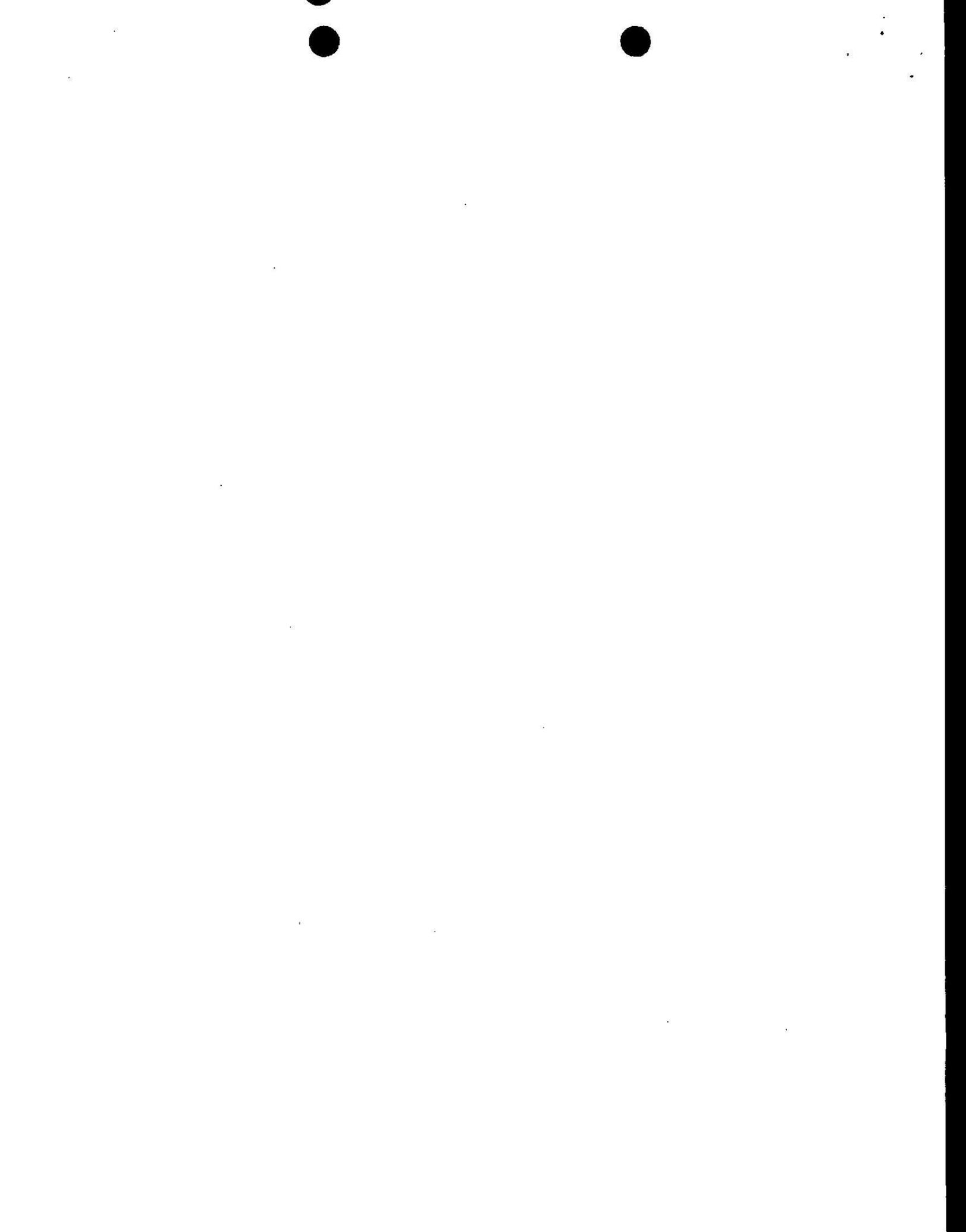
Marginal Ratings – Improvements required, written response required (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response).

Unsatisfactory Rating - Improvements required, written response required, NOV issued (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response to NOV).

Consider recommending PAI Audit from DES when:	>60% of ratings are Marginal >45% of ratings are a combination of Marginal or Unacceptable >30% of ratings are Unacceptable
------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------

Notation of Referenced Method

- | | |
|---------------------------|------------------------------|
| 1 Method 9020-B, Item 3 | 14 Method 1060A, Item 1 |
| 2 Method 1020-A, Item 1 | 15 Method 4500-CI I, Item 2 |
| 3 Method 1020-B, Item 10 | 16 Method 4500-CI I, Item 4 |
| 4 Method 2540-B, Item 2 | 17 Method 4500-NH3 D, Item 4 |
| 5 Method 2550-B, Item 1 | 18 Method 4500-NH3 D, Item 2 |
| 6 Method 1020-A, Item 1 | 19 Method 1060-B, Item 2 |
| 7 Method 4500-H B, Item 4 | 20 Method 1060-B, Item 1 |
| 8 Method 4500-H B, Item 2 | 21 Method 9222D, Item 1 |
| 9 Method 1020-B, Item 2 | 22 Method 9223 B, Item 2 |



General Lab Criteria

- | | |
|----------------------------|----------------------------|
| 10 Method 4500-O B, Item 3 | 23 Method 9223 B, Item 3 |
| 11 Method 4500-O G, Item 3 | 24 Method 1603, Item 2 |
| 12 Method 5210-B, Item 5 | 25 Method 9030-B, Item 3 |
| 13 CFR 136.3, Table II | 26 Method 9020 B, Table IV |

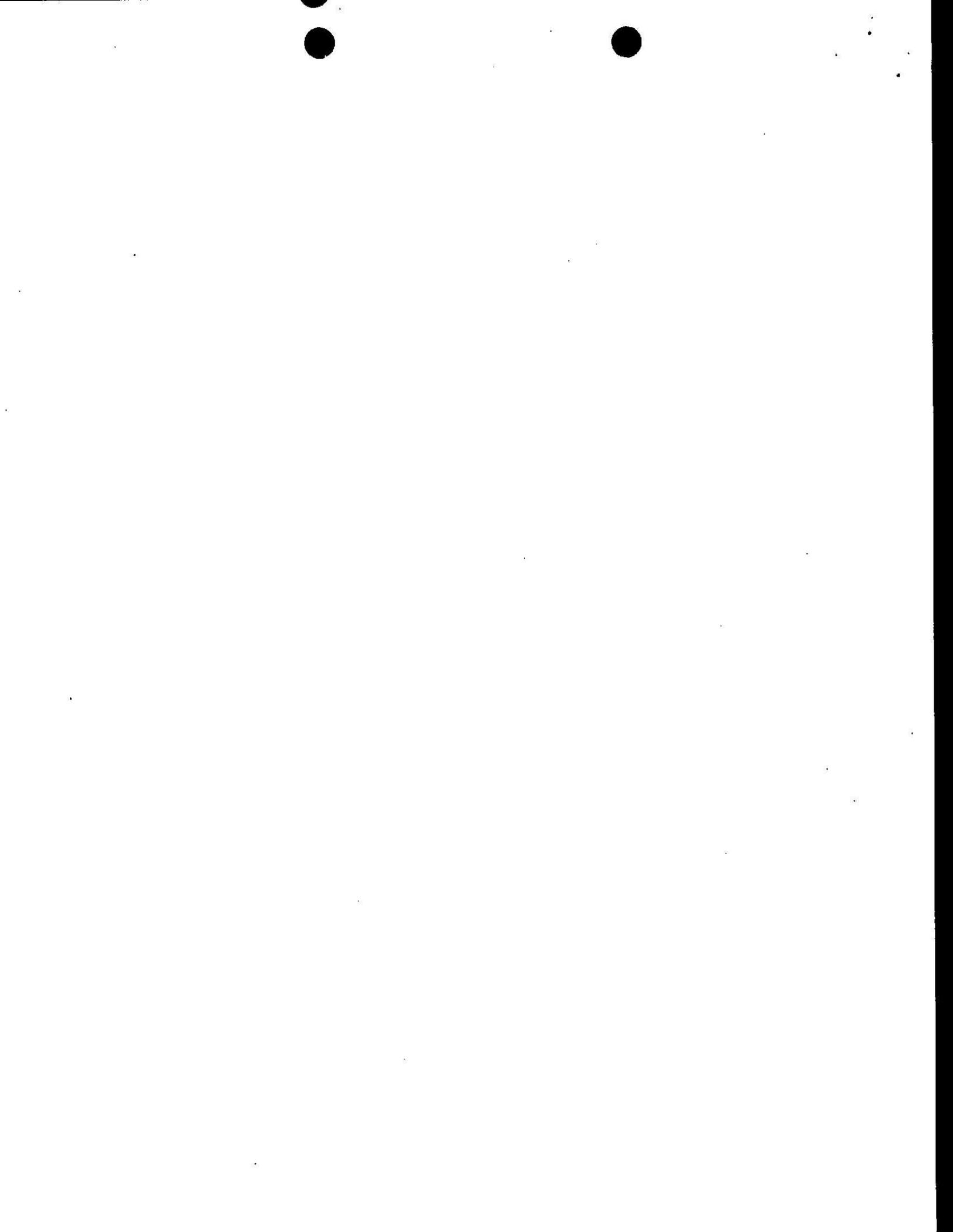
Equipment Logbook Content - all maintenance performed on a piece of equipment should be documented in the logbook. This should include parts replacement and routine maintenance activities. Entries should include date, maintenance performed and initials of person making entry.

Preservation and Holding Times

Parameter	Container	Min. Sample Size (mL)	Sample Type	Preservation	Maximum Storage Time	
					Recommended	Regulatory
BOD / CBOD	P, G	1000	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	6h	48h
TSS	P, G	200	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 d
pH	P, G	50	G	Analyze immediately	0.25h	0.25 h
NH ₃ -N	P, G	500	G, C	Analyze as soon as possible or add H ₂ SO ₄ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	28 d
TRC	P, G	500	G	Analyze immediately	0.25h	0.25 h
DO (electrode)	G, BOD Bottle	300	G	Analyze immediately	0.25h	0.25 h
Temperature	P, G	--	G	Analyze immediately	0.25h	0.25 h
Metals, general	P, G	1000	G, C	For dissolved filter immediately and add HNO ₃ to pH <2	6 months	6 months
Purgeables by purge and trap	G (PTFE lined lid)	40 (X2)	G	HCl to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	14 d
Base/Neutrals and acids	G (solvent rinsed or baked)	1000	C, G	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Pesticides	G (PTFE lined lid)	1000	C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Fecal Coliform / E-Coli	G, P (Sterilized)	100	G	Refrigerate $\leq 10^{\circ}\text{C}$ If chlorine present, add sodium thiosulfate tablet	6 hrs transport Start analysis within 2 hrs of receipt in lab.	
Oil and Grease	G	1000	G	HCl or H ₂ SO ₄ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	28 d	28 d

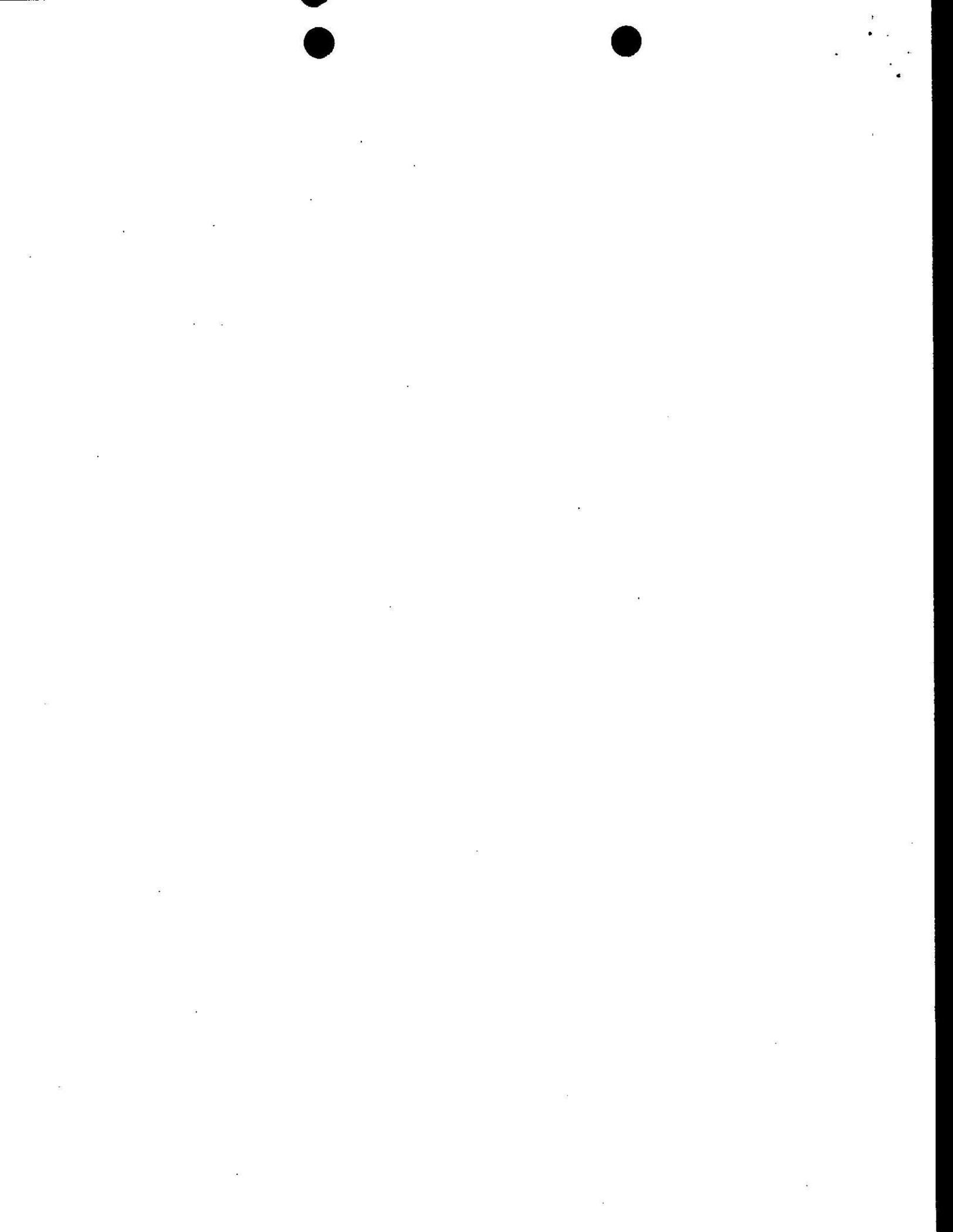
Approved Standard Methods

CBOD / BOD 5 Day	Std Methods 5210-B
Ammonia, Selective Electrode Method	Std Methods 4500-NH ₃ D
Total Residual Chlorine, DPD Colorimetric Method	Std Methods 4500-Cl G
Total Suspended Solids, Dried at 103-105 °C	Std Methods 2540-D
Dissolved Oxygen, Membrane Electrode Method	Std Method 4500-O G
pH, Electrometric Method	Std Methods 4500-H+ B
Fecal Coliform, Membrane Filter Procedure	Std Methods 9222D
Escherichia Coli, Enzyme Substrate Test	Std Method 9223B
Escherichia Coli Membrane Filtration Procedure	EPA Method 1603
Oil and Grease	USEPA 1664A or Std Methods 5520B
Metals, general	USEPA 200, Std Methods 3111B or C, or 3120B



General Lab Criteri

Volatiles (Purgeables by purge and trap)	USEPA 6210, Std Methods 624
Semi-Volatiles (Base/Neutrals and acids)	USEPA 6410, Std Methods 625
Pesticides	USEPA 6410 and 6630, Std Methods 608



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