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4PB00110 C
9/3/09

Ohio EPA

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

Central District Office

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Certified Mail #91 7108 2133 3932 4449 7723

FILE COPY

September 1, 2009

The Honorable Duane Flowers
Mayor, Village of Hanover
200 New Home Drive, NE
Hanover, OH 43055

Re: Self-Monitoring Report Violations
Village of Hanover WWTP
Licking County
Ohio EPA Permit No.: 4PB00110
NPDES Permit No.: OH0136425

Dear Mr. Flowers:

This is a Notice of Violation for effluent limitation violations that have occurred at the Hanover Wastewater Treatment Plant (WWTP) during the period of time extending from January 1- June 29, 2009. Specific instances of noncompliance are listed in Attachment "A" of this notice of violation.

Discharge monitoring report data for July, 2009 is not yet available for review in this office. July, 2009 discharge monitoring report data, if submitted electronically, was to have been submitted to this office by August 20, 2009.

Please be advised that failure to comply with effluent limitations or to satisfy monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Continued wastewater discharge permit noncompliance is unacceptable.

As you know, Jon VanDommelen from Ohio EPA worked at the WWTP with village representatives for an extended period of time to help the village try to attain consistent compliance as well as to possibly avoid additional expense. An overview of Jon's involvement is provided as Attachment "B" in this letter. As you will note in reading Attachment "B" there seems to have been a problem with consistent communication. Progress occurred, but the communication problem has been detrimental in the effort to quickly resolve this matter.

This office greatly appreciates work the village has performed thus far to eliminate unsanitary discharges from failing wastewater sources in the village. This work protects residents as well as water quality in Rocky Fork Creek. However, more progress is needed.

During the March 13, 2009, telephone discussion with Jan Rice of my staff you mentioned that the village is working with its consultant to resolve problems. If the village demonstrates aggressive action to immediately eliminate effluent limitation violations then I may continue to exercise enforcement discretion. Items that the village needs to pursue and complete include the following:

1. Solids handling improvements are necessary to help provide consistent compliance. The current solids handling system is undersized, and the operation of the plant is suffering. The village needs to invest in a better, long term solution to the solids problem. In the mean time, it needs to haul the liquid sludge more frequently than it has. It may be prudent for the village to evaluate several sludge haulers' fees to determine if sludge hauling can be performed less expensively.

2. Standard Operating Procedures mentioned in Attachment "B" must be formalized to clarify lines of communication and determine the role of each individual at the WWTP.

3. Equipment must be installed to allow the collection system main pump station backup generator to operate automatically during power loss.

4. The WWTP electronic Human-Machine Interface (HMI) equipment needs weatherproofing to ensure consistent process control. HMI failure may result in effluent limitation violations.

5. If not already occurring, ensure that the contract operator is communicating directly with you as well as with ADR regarding any WWTP problems that may occur.

I need to see documented progress in order to evaluate enforcement options. Within 10 days of your receipt of this letter please send Jan Rice in this office written documentation of both the short and long term improvements to the five items listed above as well as the sludge hauling records from January 2009 to now. Any future hauling records should also be sent to Jan Rice until we request otherwise. Jan Rice can be reached by telephone at 614-728-3850or by e-mail at jan.rice@epa.state.oh.us .

If you have any questions and/or would like to meet for further discussion of this matter please let me know. I can be reached by telephone at (614) 728-3843 or by e-mail at: mike.gallaway@epa.state.oh.us .

Sincerely,

Mike Gallaway
Manager
Division of Surface Water
Central District Office

MG/nsm Hanover 8-11-09

Attachment "A"
Village of Hanover
Effluent Limitation Violations (1/1/09 – 6/29/09)
Effluent monitoring station 4PG00028001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00110*AD	January 2009	001	00530	Total Suspended Solids	30D Conc	12	19.25	1/1/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	16.825	1/1/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	30D Qty	1.8	3.76644	1/1/2009
4PB00110*AD	January 2009	001	80082	CBOD 5 day	30D Conc	10	20.5	1/1/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.96	1/2/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.86	1/5/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.49	1/6/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.79	1/7/2009
4PB00110*AD	January 2009	001	00530	Total Suspended Solids	7D Conc	18	42.	1/8/2009
4PB00110*AD	January 2009	001	00530	Total Suspended Solids	7D Qty	10.9	11.2010	1/8/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	24.7	1/8/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	2.7	6.58727	1/8/2009
4PB00110*AD	January 2009	001	80082	CBOD 5 day	7D Conc	15	25.	1/8/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.95	1/8/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.59	1/9/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	21.	1/15/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	2.7	5.11724	1/15/2009
4PB00110*AD	January 2009	001	80082	CBOD 5 day	7D Conc	15	31.	1/15/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.52	1/15/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.09	1/20/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	21.5	1/22/2009
4PB00110*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	2.7	3.33892	1/22/2009
4PB00110*AD	January 2009	001	80082	CBOD 5 day	7D Conc	15	23.	1/22/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.6	1/22/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.77	1/26/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.49	1/28/2009
4PB00110*AD	January 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	2.23	1/29/2009

Attachment "A"
Village of Hanover
Effluent Limitations Violation (1/1/09 – 6/29/09)
Effluent monitoring station 4PG00028001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00110*AD	February 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	10.7666	2/1/2009
4PB00110*AD	February 2009	001	00610	Nitrogen, Ammonia (NH3	30D Qty	1.8	2.90278	2/1/2009
4PB00110*AD	February 2009	001	80082	CBOD 5 day	30D Conc	10	14.1666	2/1/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.05	2/2/2009
4PB00110*AD	February 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	19.6	2/8/2009
4PB00110*AD	February 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	2.7	5.78799	2/8/2009
4PB00110*AD	February 2009	001	80082	CBOD 5 day	7D Conc	15	33.	2/8/2009
4PB00110*AD	February 2009	001	80082	CBOD 5 day	7D Qty	9.1	9.74509	2/8/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.12	2/10/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.46	2/12/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.96	2/13/2009
4PB00110*AD	February 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	11.4	2/15/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	2/16/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.87	2/17/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.9	2/18/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.96	2/19/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.66	2/20/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	2/24/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.83	2/26/2009
4PB00110*AD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.5	2/27/2009
4PB00110*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.8	3/1/2009
4PB00110*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	13.6	3/1/2009
4PB00110*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3	30D Qty	1.8	6.91393	3/1/2009
4PB00110*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	2.7	9.33116	3/1/2009
4PB00110*AD	March 2009	001	80082	CBOD 5 day	30D Conc	10	12.2222	3/1/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.	3/3/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	3/4/2009

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Village of Hanover
Effluent Limitation Violations (1/1/09 – 6/29/09)
Effluent monitoring station 4PG00028001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	3/5/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.	3/6/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.6	3/10/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.4	3/11/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	3/12/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	3/13/2009
4PB00110*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	8.2	3/15/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	3/16/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	3/17/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.	3/18/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	3/19/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	3/20/2009
4PB00110*AD	March 2009	001	80082	CBOD 5 day	7D Conc	15	17.	3/22/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	3/23/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	3/24/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	3/26/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.	3/27/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	3/30/2009
4PB00110*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.1	3/31/2009
4PB00110*AD	April 2009	001	00530	Total Suspended Solids	30D Conc	12	15.6666	4/1/2009
4PB00110*AD	April 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	13.45	4/1/2009
4PB00110*AD	April 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	6.1	4/1/2009
4PB00110*AD	April 2009	001	00610	Nitrogen, Ammonia (NH3	30D Qty	1.8	2.80973	4/1/2009
4PB00110*AD	April 2009	001	80082	CBOD 5 day	30D Conc	10	18.5555	4/1/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.7	4/1/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.2	4/2/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.	4/3/2009

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Village of Hanover
Effluent Limitation Violations (1/1/09 – 6/29/09)
Effluent monitoring station 4PG00028001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	4/6/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.2	4/7/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	4/8/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.9	4/9/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.9	4/10/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.8	4/13/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	2.3	4/14/2009
4PB00110*AD	April 2009	001	00530	Total Suspended Solids	7D Conc	18	29.5	4/15/2009
4PB00110*AD	April 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	19.5	4/15/2009
4PB00110*AD	April 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	2.7	7.97121	4/15/2009
4PB00110*AD	April 2009	001	80082	CBOD 5 day	7D Conc	15	27.5	4/15/2009
4PB00110*AD	April 2009	001	80082	CBOD 5 day	7D Qty	9.1	9.90913	4/15/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.6	4/15/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.3	4/16/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	4/17/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.9	4/20/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.	4/21/2009
4PB00110*AD	April 2009	001	00530	Total Suspended Solids	7D Conc	18	19.	4/22/2009
4PB00110*AD	April 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	25.8	4/22/2009
4PB00110*AD	April 2009	001	80082	CBOD 5 day	7D Conc	15	24.5	4/22/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	.8	4/22/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	1.2	4/23/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.06	4/27/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.	4/28/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	2.5	4/29/2009
4PB00110*AD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.2	4/30/2009

Attachment "A"
Village of Hanover
Effluent Limitation Violations (1/1/09 – 6/29/09)
Effluent monitoring station 4PG00028001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00110*AD	May 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.05	5/1/2009
4PB00110*AD	May 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	4.6	5/1/2009
4PB00110*AD	May 2009	001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.91	1.61922	5/1/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	5/1/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	5/4/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	5/5/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.8	5/6/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	5/7/2009
4PB00110*AD	May 2009	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	2.4	5/8/2009
4PB00110*AD	May 2009	001	31616	Fecal Coliform	7D Conc	2000	2300.	5/8/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.9	5/8/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.9	5/11/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.6	5/12/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.6	5/13/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.8	5/14/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.2	5/15/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.5	5/18/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.9	5/19/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.2	5/20/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.2	5/21/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.1	5/22/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	5/26/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	5/27/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.3	5/28/2009
4PB00110*AD	May 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	5/29/2009

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Village of Hanover
Effluent Limitations Violations (1/1/09 - 6/29/09)
Effluent monitoring station 4PG00028001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00110*AD	June 2009	001	31616	Fecal Coliform	7D Conc	2000	8500.	6/1/2009
4PB00110*AD	June 2009	001	80082	CBOD 5 day	30D Conc	10	11.	6/1/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.09	6/1/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.73	6/2/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.95	6/3/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	2.52	6/4/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.09	6/5/2009
4PB00110*AD	June 2009	001	00530	Total Suspended Solids	7D Conc	18	22.5	6/8/2009
4PB00110*AD	June 2009	001	80082	CBOD 5 day	7D Conc	15	30.5	6/8/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.47	6/8/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.18	6/9/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.83	6/10/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.8	6/11/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.26	6/12/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.83	6/15/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.78	6/16/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.35	6/17/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.31	6/22/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.9	6/23/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.82	6/26/2009
4PB00110*AD	June 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.47	6/29/2009

>>> "Jason & MaryAnn Figgins" <jmfiggins@embarqmail.com> 6/4/2009 6:24 PM >>>
Jon-I'm not sure how the three parties got into this communication mess. I will tell you that to my knowledge we have performed all the process control tests and wasted/ decanted from the holding tank every day since our meeting at the plant at the end of April. I have not adjusted or touch any of the setpoints as to what you have set them at. Our biweekly results are coming back better than before since we got the auto-sampler working.

The village has spent over $10K in wasting sludge. This is a big impact on this small villages bank account. We can't lose sight of that. We are not able to keep up with the amounts of solids that need wasted.

Just to be clear, we are following your lead. We are not the type to go behind your adjustments and make our own. Since you are the person standing in between the village and enforcement. You are the man!

Now, moving on, MaryAnn and I are exploring the possibility of a "GEO-Dumpster" or other methods for the plants sludge processing. At least this will add some flexibility with sludge management.

I WILL BE UPDATING THE SPREADSHEET AND SENDING OFF FOR YOUR REVIEW!

Respectfully,

Jason Figgins

Attachment "B"

From: Jon VanDommelen
To: jcarr@adrcivil.com
Date: 6/9/2009 2:45 PM
Subject: Re: Hanover Process Control

Ok. Here my issues:

1) My job here is to assist the Village of Hanover with the compliance problems at their wwtp. I realize that due to schedules (mine as well as the rest of you) we have trouble being onsite together. This makes it difficult to learn the system's quirks and controls. I spent days with the Kruger rep, essential alone, to try to learn what the control set points mean and how best to relate them to the process control data to effect better treatment. But the rest of you need to know how to do this, because I will move on to other communities. That is why I tried to set up a system where by information could be collected and shared and process control decisions could be discussed and agreed upon. This way we, as a group, learn the system, how best to monitor the system, and what change to make to the program when the data tells us that a change is necessary. Unfortunately, that is not happening. Does anyone have a better idea? I am open to suggestions. My way is certainly not the only way. But as far as I can tell, it is the only way that has been proposed, at least as far as I know.

2) Solids handling is inadequate. Based on 60,000 gpd average flow, 200 mg/L cBOD5 influent and a sludge yield of 0.6 lb sludge /lb cBOD5, the plant has about 55 day sludge storage (that is just to take care of what comes in, not catch up). That would mean that the sludge tank would have to be hauled about 6 -7 times per year, roughly. Since sludge handling is very likely the number 1 performance limiting factor for this wastewater plant, and given that this has been common knowledge among this email group for at least a couple of months, how close to implementation is a proposed solution to this issue? If this issue isn't remedied, then compliance will never be consistent.

3) How many permit violations did Hanover have in May? 3? 10? 40? Who is keeping track of this and is this information being distributed to those who need to know?

4) What is the nature of the violations? What steps are being taken to bring the wwtp into compliance so there are not further violations? Who is keeping track of this and is this information being distributed to people who need to know?

5) Is there a standard operating procedure for the lab equipment, for the sample regimen, for the process control, for daily walk through of the plant, so the people who are doing the daily tasks are doing them correctly? There is a correct way to store probes (the DO probe should not be stored in pH buffer) so that the data is valid. There is a correct procedure for collecting daily effluent tests (pH, DO) which needs to be addressed.

6) Is the process control data being used to make process control decisions? Is the process control data being distributed to the people who need to know? If it is not being used, then why bother collecting it.

7) In order for the process control data to make sense, it should be related to where plant is in the SBR cycle, A ammonia sample taken off a spin that collected 5 minutes into an oxic cycle would be high. If ammonia is high off the first 5 minutes of a decant cycle, then there is a problem. Same results, different conclusions. The HMI is still not installed in the shed, so there is no way to easily relate the sampling to the cycle. The village was onsite within a couple of days of the Krueger reps visit (and replacement of the HMI) to move the shed and run conduit. The HMI is what tells us where the plant is operating. The HMI is where changes to the cycles are made based on the process control data. If ammonias are not meeting permit, what change do we need to make in the program to get into compliance?

8) Every day someone is taking an effluent DO sample. Where is this sample taken? According to the permit, it should be taken after the last treatment unit (UV). I have dropped a DO probe in the effluent just after the Parshall flume on several accessions and have never seen a number greater than 5 mg/L since maybe April. The limit is 6 mg/L. Is anyone else concerned about this? Is a plan to remedy this taking place? The other option would be to measure DO at the end of the effluent pipe. It might meet permit there due to the turbulence of travelling through the pipe.