



**Environmental
Protection Agency**

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

CERTIFIED MAIL #91 7108 2133 3932 1838 5650

November 30, 2011

Holly Royer, Village Administrator
Village of Alexandria
4 W. Main Street
Alexandria, OH 43001

**Re: Alexandria WWTP
NPDES Permit 4PA00106/ OH0136115
Reconnaissance Inspection
Licking County
Notice of Violation**

Dear Ms. Royer:

This correspondence serves as Notice of Violation for failure to comply with the Schedule of Compliance contained in the NPDES permit issued to the Village of Alexandria. The schedule required that the effluent flow meter be placed into service and be made operational no later than November 1, 2011.

On November 7, 2011, a Reconnaissance Inspection was conducted at the Alexandria WWTP. Present for the inspection were Jack Liggett representing the Village of Alexandria, Paul Vandermeer and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

The Reconnaissance Inspection raised several concerns which must be addressed in the following areas

Effluent Flow Meter – The effective NPDES permit contains a Schedule of Compliance (Part I.C. on page 5) which required the effluent flow meter to be placed into service and be made functional on or before November 1, 2011. (Please note that the previously issued permit contained a similar schedule to install and operate a final effluent flow meter). At the time of the inspection, a parshall flume and ultrasonic meter were installed downstream of the ultraviolet disinfection unit; however, the unit was not functional. Please provide a schedule, in writing within 14 days of receipt of this correspondence, which provides for a fully functioning effluent flow meter no later than January 30, 2012. Failure to comply with this milestone shall result in the initiation of formal enforcement action against the Village of Alexandria.

Holly Royer, Village Administrator
Village of Alexandria
Page -2-

Outfall Signage - In accordance with Part II. S (page 12) of the effective NPDES permit a sign identifying the location of the outfall 001 discharge to the Raccoon Creek was required to be installed no later than September 1, 2011. Please have the sign installed no later than 30 days following the receipt of this correspondence and provide confirmation once installation is completed (an e-mailed photograph would be acceptable).

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3 or e-mail at @epa.ohio.gov.

Sincerely,

A handwritten signature in black ink that reads "Michael Sapp". The signature is written in a cursive, flowing style.

Michael Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Michael Sapp

MS/nsm Alexandria 11

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PA00106	OH0136115	RI	S	Public
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
11/7/2011	10:00 AM	11:15 AM	Yes	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Alexandria WWTP Granville Road and State Route 37 Alexandria, Ohio 43001	5/1/2011
	Permit Expiration Date
	4/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Jack Liggett, Plant Superintendent	(740) 404-4315
Name and Title of Responsible Official	Phone Number
Holly Royer, Village Administrator	(740) 924-2539

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Non-compliance with Schedule of Compliance and absence of outfall signage.
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
U	Flow Measurement	Failure to provide functional effluent flow meter.
M	Receiving Waters	Ammonia violations in October 2010.
S	Laboratory	

Comments: (see attached)

Signatures	
 11/21/11	 11/22/11
Michael Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Alexandria WWTP between 10/1/2010 to 10/30/2011

Summary

Permit Effluent Limit Violations: 4

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2010	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.65	10/1/2010
October 2010	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	4.4	10/1/2010
October 2010	001	Nitrogen, Ammonia (NH3	30D Qty	0.30	.32157	10/1/2010
October 2010	001	Nitrogen, Ammonia (NH3	7D Qty	0.45	.56957	10/1/2010

ADDITIONAL INFORMATION
Village of Alexandria WWTP
4PA00106 – OH0136115

The Alexandria WWTP has a design average treatment capacity of 80,000 gpd with a discharge to Raccoon Creek. The treatment plant consists of an influent pump station, mechanically cleaned bar screen, flow equalization, extended aeration, clarification, fixed media clarification, tertiary sand filtration and ultraviolet disinfection. Solids handling facilities consist of aerated sludge holding with thickening/decant capabilities.

1. At the time of the inspection, the following general observations were made with respect to the operational practices at the plant;

- Waste Management is contracted to dispose of solids removed from the influent bar screen.
- The aeration and flow equalization blowers are operated in an on/off mode of operation (20 minutes on followed by 40 minutes off).
- The operator wastes sludge for approximately 20 minutes every day or until the WAS lines begin to run clear.
- A sludge judge in the final clarifiers is also used to monitor and assess solids inventories. The operator indicated that he attempts to maintain 6-8 feet of solids in the final clarifiers.
- The fixed media clarifiers are drained and cleaned twice a year (spring and fall).
- Two of the four tertiary sand filters are kept on line at a time.
- A significant growth of duckweed was observed on the surface of the clarifiers.
- The decant from the sludge holding tank and flows from fixed media filter cleaning are drained back to the head of the plant.
- Jack Liggett is the Operator of Record and Glen Hackert is the replacement operator. Jack holds a Class III license and is at the plant 7 days/week for at least a half hour a day.
- MASI laboratories analyzes effluent samples in accordance with NPDES permit requirements. MASI also takes a dissolved oxygen reading at the time of sample pick-up.
- The plant is equipped with a diesel generator capable of providing back-up power to the entire plant.

2. The operator indicated that he had experienced problems with a transducer in the tertiary dosing tank during power outages. When this occurred the tertiary dosing tank would send flows back to the head of the plant. The operator attributed the high flow values on May 31, 2011 (0.133 MGD) and September 2-5, 2011 (0.085-0.124) to transducer problems. Flows are reported using the influent flow meter so these flows are recorded again when they're returned to the head of the plant. This problem has been corrected.
3. The average daily flow for the past year is approximately 27,000 gpd. Effluent flows are reported using readings taken from an influent magmeter.
4. The plant experienced both concentration and loading violations for ammonia in October 2010. The operator attributed these violations to the inexperience of the back-up operator since the primary operator was out on an extended medical leave. Please be advised that Part III-12 of your effective NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. To date, no written responses have been received for the effluent violations experienced at the plant since the previous inspection. Please provide the required explanations for all permit violations from this point forward.
5. Effluent samples are collected on Tuesdays and are comprised of multiple hourly grab samples. These samples are not proportionate to the volume of flow discharged. Please modify your sample collection method to collect a flow-weighted composite sample. Part II.G. of your effective permit requires a flow weighted composite sample. In addition, please place a thermometer in your composite sampler to ensure that the samples are stored at the appropriate temperature.
6. The effective NPDES permit contains a Schedule of Compliance (Part I.C. on page 5) which required the effluent flow meter to be placed into service and be made functional on or before November 1, 2011. (Please note that the previously issued permit contained a similar schedule to install and operate a final effluent flow meter). At the time of the inspection, a parshall flume and ultrasonic meter were installed downstream of the ultraviolet disinfection unit; however, the unit was not functional. Please provide a schedule, in writing within 14 days of receipt of this correspondence, which provides for a fully functioning effluent flow meter no later than January 30, 2012.
7. A sign is required that identifies the location of the permitted outfall to the unnamed tributary to Raccoon Creek. The effective NPDES permit required this sign to be installed on or before September 1, 2011. Please have this sign posted within the next 30 days and submit documentation to this office once it is accomplished. The sign must comply with the following requirements:
 - The marker shall consist, at a minimum, of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height.

- The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible.