



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

December 14, 2012

Mayor and Council  
Village of Russellville  
P.O. Box 158  
Russellville, Ohio 45168

**RE: Village of Russellville WWTP, NPDES Permit No. 1PA00104\*CD / OH0048682  
Reconnaissance Inspection and Notice of Violation**

Dear Mayor and Council:

On Wednesday, November 14, 2012, Ron Ware of this office, conducted a Reconnaissance Inspection at the above-referenced Facility. George Culver, Operator of Record, represented the Village during the inspection. The purpose of the inspection was to evaluate plant operation and performance. In addition, information gathered during the inspection assists in the determination of compliance with the NPDES Permit. As indicated in the attached report, two of the five areas that were evaluated during the inspection received a rating other than "Satisfactory."

"Effluent/Receiving Waters" received a "marginal" rating due to violations of the final effluent limitations in this facility's current NPDES Permit (1PA00104\*CD) that have occurred over the past year.

"Operations and Maintenance" received an "unsatisfactory" rating due to a failure to maintain an adequate ratio between the flow rate in the receiving stream and the plant's discharge flow rate during controlled discharges over the past year. The current NPDES Permit for this Facility (1PA00104\*CD) requires that a 5:1 ratio between the flow rate in the receiving stream and the plant's discharge flow rate be maintained during controlled discharges. The current permit also prohibits any controlled discharges when the flow rate in the receiving stream is less than 0.5 MGD. The monitoring data over the past year for this Facility shows that there were 20 days during the past year when controlled discharges occurred and the required 5:1 ratio between the flow rate in the receiving stream and the plant's discharge flow rate was not maintained. This monitoring data also shows that there were three days during the past year when controlled discharges occurred and the flow rate in the receiving stream was less than 0.5 MGD.

In his written response to last year's Compliance Evaluation Inspection Report, Operator of Record John Van Harlingen stated the following: "Lagoon discharging is undertaken when the upstream creek flow is greater than 0.5 MGD and the lagoon discharge valve is then adjusted to a rate of at least 5:1 dilution. The violations occur between the time of initially opening the lagoon discharge valve and the plant visit the following day. The creek flow can decrease quickly over a 24 hour period and the lagoon discharge rate remains the same as the previous day's setting. The Village has recently discussed the option of installing a cellular alarm dialer at the plant that would alert us to high and low stream flows, allowing a much quicker response time for the purpose of opening, adjusting, or closing the lagoon discharge valve. The Village will decide during its December (2011) meeting as to whether they will have the necessary funds to install the dialer on 2012. Until such time, we may have to visit the plant more often than just once per day while discharging."

We realize that this past year's prolonged drought made adequate controlled discharge opportunities few and far between. However, please provide this office with a written response as to whether the Village intends to follow through with the installation of the cellular alarm dialer that Mr. Van Harlingen mentioned, if it intends to implement some other measure(s) to address the issue of determining when suitable receiving stream flow conditions occur, or if it intends to resume use of the land application system for disposal of the treatment plant's effluent. Please provide this office with this written response within thirty days of receipt of this letter. Also, please be advised that failure to comply with the effluent limitations, to satisfy the monitoring or reporting requirements, or to meet the discharge conditions of the treatment plant's NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

A draft renewal NPDES Permit for this Facility (1PA00104\*DD) has been prepared and will be sent out to public notice in the coming months. This draft permit will have the following requirement:

#### Effluent Disinfection Standard

Due to changes in the State of Ohio's Water Quality Standards, the disinfection standard in NPDES Permits has been changed from fecal coliform to E. coli. For the Village's treatment plant, the applicable E. coli standards will be 2318 counts/100 ml (weekly geometric mean). Interim and final effluent tables along with a compliance schedule have been added to the draft renewal permit to allow the Village some time to evaluate whether its treatment works can comply with the new limit for E. coli.

Village of Russellville WWTP

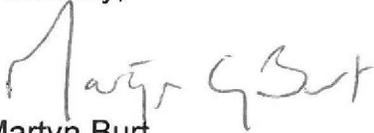
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If you have any questions regarding this report, please contact Mr. Ware at (937) 285 - 6098 or by email at [ron.ware@epa.state.oh.us](mailto:ron.ware@epa.state.oh.us).

Sincerely,

A handwritten signature in black ink that reads "Martyn Burt". The signature is written in a cursive style with a large initial "M".

Martyn Burt

Compliance and Enforcement Supervisor  
Division of Surface Water

MB/tb

cc: John Van Harlingen, The H<sub>2</sub>O Company





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
1PA00104*CD	OH0048682	11/14/2012	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Russellville WWTP Fairgrounds Drive Russellville, Ohio 45168	11:27 AM	May 1, 2008
	Exit Time	Permit Expiration Date
	12:15 PM	April 30, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
George Culver, Operator of Record	(937) 446 - 3256	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council Village of Russellville P.O. Box 323 Russellville, Ohio 45168	(937) 377 - 9129	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Inspector	Reviewer
<i>Ron Ware</i> Ron Ware Division of Surface Water Southwest District Office	<i>Martyn Burt</i> Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
12/14/2012 Date	12/14/2012 Date

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

**Section F: Compliance**

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

Comments/Status:

See attached inspection notes for information on effluent violations.

**Section G: Operation & Maintenance**

**Record Keeping/Operator of Record:**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (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)  

Hard bound book
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
  - I. Identification of treatment works..... N

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- II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
  - 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)... N
  - 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..... Y

**Comments/Status:**

(j)(l) Identification of the treatment works needs to be provided on/in the ORC log book.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

**Primary flow measuring devices**

The secondary lagoon has a 6 inch in-line propeller type meter with a flow totalizer on its controlled discharge line. The upstream weir structure in the receiving stream is an ultrasonic level sensing meter that is wired to a circular chart recorder and totalizer located in the control building.

- (a) Flow measurement equipment adequate to handle full range of flows..... Y
- (b) All discharged flow is measured..... Y

**Comments/Status:**

**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..... Y
- (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:**

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The lab analysis for CBOD<sub>5</sub>, Ammonia Nitrogen and Total Suspended Solids is conducted in the lab at the Lake Waynoka WWTP. The lab analysis for fecal coliform is conducted in either the lab at the Sardinia WWTP or in the lab at the Mt. Orab WWTP.

### **Section J: Effluent/Receiving Water Observations**

Outfall # 1PA00104\*CD

Outfall Description: Plant outfall to Honey Creek

Receiving Stream: Honey Creek

Receiving Stream Description: Warm Water Habitat, Secondary Contact Recreation

### Items noted during the inspection

One of the surface aerators was running on the treatment lagoon at the time of the inspection. The aerators operate on a rotating basis.

The piping for land application disposal of treated effluent from the plant is stored behind the control building for the treatment plant. The wooded area around the treatment plant has been cleared away from the valve pits for the land application system. Sections of the piping can be re-assembled in a couple of hours to allow land application to occur in select areas around the treatment plant.

During controlled discharge events, samples of the treated effluent from the controlled discharge lagoon are taken from a yard hydrant on the effluent line from the controlled discharge lagoon.

### Items requiring correction

1. A review of the Russellville WWTP's monthly operating reports (October 2011 thru November 2012) revealed the following final effluent violation:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
Sept. 2011	001	Fecal Coliform	1D Conc	5000	12300.	9/27/2012

2. The current NPDES permit for this facility (1PA00104\*CD) requires that a 5:1 ratio between the flow rate in the receiving stream and the plant's discharge flow rate be maintained during controlled discharges. The current permit also prohibits any controlled discharges when the flow rate in the receiving stream is less than 0.5 MGD. The monitoring data for this facility shows that there were 20 days during the past three years when controlled discharges occurred and the required 5:1 ratio between the flow rate in the receiving stream and the plant's discharge flow rate was not maintained. This monitoring data also shows that there were 3 days during the past three years when controlled discharges occurred and the flow rate in the receiving stream was less than 0.5 MGD.