



**Environmental
Protection Agency**

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



1PT0004720081118

HAMILTON SAINT JOHN THE BAPTIST CHURCH AND SCH SARLE, EDWARD 2008/11/18

Sewage



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

November 18, 2008

Ms. Donna Sunderhaus
St. John the Baptist Church and School
5361 Dry Ridge Road
Cincinnati, Ohio 45252

Re: Hamilton County, St. John the Baptist Church and School
Compliance Evaluation Inspection and Notice of Violation

Dear Ms. Sunderhaus:

On November 10, 2008, Bob Ostendorf and I conducted a Compliance Evaluation Inspection at the St. John the Baptist Church and School (NPDES Permit No. OH0046973; OEPA Permit No. 1PT00047*AD). The inspection was also conducted as part of the NPDES Permit renewal. Representing this facility was Donna Sunderhaus, Brad Hasselbeck, Gene Culman, Dale Bosse and Greg Ross. A copy of my inspection report is enclosed.

The inspection report contains two unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. The Compliance Schedule section was rated unsatisfactory as a result of the failure to upgrade the WWTP in accordance with the NPDES Permit.

Due to the numerous NPDES Permit violations, the Ohio EPA will not be renewing your current NPDES Permit. St. John the Baptist Church and School must take immediate action to eliminate the noted violations. St. John the Baptist Church and School must connect as soon as possible to the sanitary sewers that are available and accessible. Until this final connection is made, St. John the Baptist Church and School must comply with the current monitoring and reporting requirements contained in their NPDES Permit.

The areas noted in the report summary will require a written response by December 19, 2008. The response should include a description of the proposed actions and the dates for completion of these actions.



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If you have any questions, please call me at (937) 285-6096.

Sincerely,

A handwritten signature in black ink, appearing to read "Ned Sarle". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Greg Ross, Winelco, Inc.
Dave Ellert, Hamilton County General Health District



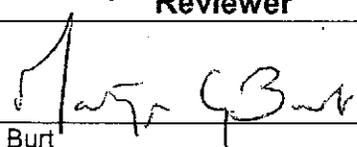
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PT00047*AD	OH0046973	11/10/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
St. John the Baptist Church and School 5361 Dry Ridge Road Cincinnati, Ohio 45252	9:50 A.M.	2/1/2004
	Exit Time	Permit Expiration Date
	11:00 A.M.	1/31/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Ross, Winelco, Inc.	(513) 755-8050	
Donna Sunderhaus, Business Manager	(513) 385-8010	
Brad Hasselbeck, Maintenance	(513) 385-8010	
Gene Culman, Cementary Board	(513) 385-8010	
Dale Bosse, Buildings and Grounds Committee	(513) 385-8010	
Name, Address and Title of Responsible Official	Phone Number	
Ms. Donna Sunderhaus, Business Manager 5361 Dry Ridge Road Cincinnati, Ohio 45252	(513) 385-8010	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	U	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).	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
11/18/08 Date	11/18/08 Date

Permit #: 1PT00047*AD
NPDES #: OH0046973

Summary of Findings / Comments

Areas Requiring a Response

A review of the Monthly Operating Reports (MORs) for February 2004 through September 2008 indicated numerous NPDES Permit violations. These violations are listed on Attachment I. The noted violations have been reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification". Future violations must continue to be reported as required by the permit. Finally, action must be taken to immediately eliminate these violations.

The MSD Pebble Creek WWTP recently was connected to the MSD Talyor Creek WWTP. The Pebble Creek collection system extends to within several hundred feet of St. John the Baptist Church and School (St. John). In the past, the limitations at the Pebble Creek WWTP have prevented St. John from connecting to this central sewage system. With the elimination of the Pebble Creek WWTP, this limitation has been removed. Therefore, this central sewer system is now available and accessible.

To eliminate the noted NPDES Permit violations, St. John must connect to this central sewage system as soon as possible. St. John is required to provide a construction schedule to connect to the MSD sewage system. St. John should be able to complete this construction within six months. St. John should also provide quarterly written updates on the construction status. These reports should be submitted within three months of the date of this inspection report.

Areas Not Requiring a Response

The WWTP is designed for an average daily design flow rate of 0.014 MGD. The September 2006 through September 2008 MORs indicated the average daily flow rate was 0.0013 MGD and the peak daily flow rate was 0.0064 MGD.

The WWTP consists of a trash trap, aeration tank, secondary clarifier and chlorinator. Chlorine tablets are placed in the secondary clarifier effluent trough. Dechlorination tablets are placed in the chlorinator. The inlet baffle in the secondary clarifier was broken. This baffle should be repaired as soon as possible. Solids are removed once every month or two from various points in the WWTP. Winelco hauls these solids to MSD. The WWTP flow rate is estimated using an elapse time meter on the effluent pump.

St. John was required to upgrade the WWTP in accordance to the NPDES Permit as detailed in Part I.C titled "Schedule of Compliance." This schedule required a Permit to Install application be submitted by February 1, 2006; construction be started by August 1, 2006; construction be completed by January 1, 2007; and final compliance be achieved by February 1, 2007. St. John has failed to comply with these requirements.

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The church parsonage is served by an aeration system. This system is regulated by the Hamilton County General Health District. When the package plant is connecting to the sanitary sewer, St. John may want to consider including the parsonage in this project. The local health department may also have requirements about connecting the parsonage to the central sewer system. Please contact the health department about their requirements.

A grinder collection system apparently must be used to connect to the Pebble Creek collection system. St. John was requesting for examples of any other facilities that recently proposed this type of system. The St. Ignatius church located 5222 North Bend Road has recently installed a grinder pump force main system. Our Lady of the Visitation Church located at 3172 South Road is also considering a similar system.

Attachment I
 Effluent Limit Violations for February 2004 through September 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
July 2004	TSS	Monthly	mg/l	30	54
July 2004	TSS	Weekly	mg/l	45	54
January 2005	TSS	Monthly	mg/l	30	65
January 2005	TSS	Weekly	mg/l	45	65
March 2005	TSS	Monthly	mg/l	30	54
March 2005	TSS	Weekly	mg/l	45	54
April 2005	TSS	Monthly	mg/l	30	41
December 2005	TSS	Monthly	mg/l	30	36
February 2007	Ammonia	Monthly	mg/l	3.0	4.3
February 2007	TSS	Monthly	mg/l	12	15
May 2007	Chlorine	Daily	mg/l	0.019	0.52
June 2007	CBOD5	Monthly	mg/l	10	16
June 2007	Ammonia	Monthly	mg/l	1.0	12
June 2007	TSS	Monthly	mg/l	12	13
June 2007	CBOD5	Weekly	mg/l	15	16
June 2007	Ammonia	Weekly	mg/l	1.5	12
June 2007	Chlorine	Daily	mg/l	0.019	0.15
July 2007	CBOD5	Monthly	mg/l	10	12
July 2007	TSS	Monthly	mg/l	12	268
July 2007	TSS	Weekly	mg/l	18	268
July 2007	TSS	Monthly	kg/day	0.63	5.5
July 2007	TSS	Weekly	kg/day	0.95	5.5
August 2007	Fecal Coliform	Monthly	#/100ml	1000	"AK"
August 2007	Fecal Coliform	Weekly	#/100ml	2000	"AK"
August 2007	Ammonia	Monthly	mg/l	1.0	81
August 2007	Ammonia	Monthly	kg/day	0.053	0.15
August 2007	TSS	Monthly	mg/l	12	44
August 2007	CBOD5	Weekly	mg/l	15	20
August 2007	Ammonia	Weekly	mg/l	1.5	81
August 2007	Ammonia	Weekly	kg/day	0.079	0.15
August 2007	TSS	Weekly	mg/l	18	44
August 2007	DO	Daily	mg/l	6.0	3.8
September 2007	Fecal Coliform	Monthly	#/100ml	1000	1800
September 2007	Ammonia	Monthly	mg/l	1.0	2.3
September 2007	Ammonia	Weekly	mg/l	1.5	2.3
October 2007	Ammonia	Monthly	mg/l	1.0	2.9
October 2007	Chlorine	Daily	mg/l	0.019	0.3
October 2007	Ammonia	Weekly	mg/l	1.5	2.9

Attachment I
 Effluent Limit Violations for February 2004 through September 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
November 2007	Ammonia	Monthly	mg/l	3.0	4.0
November 2007	TSS	Monthly	mg/l	12	30
November 2007	TSS	Weekly	mg/l	18	30
December 2007	Ammonia	Monthly	mg/l	3.0	3.6
December 2007	TSS	Monthly	mg/l	12	32
December 2007	TSS	Weekly	mg/l	18	32
January 2008	TSS	Monthly	mg/l	12	14
February 2008	Ammonia	Monthly	mg/l	3.0	14
February 2008	Ammonia	Weekly	mg/l	4.5	14
February 2008	TSS	Monthly	mg/l	12	30
February 2008	TSS	Weekly	mg/l	18	30
April 2008	TSS	Monthly	mg/l	12	22
April 2008	TSS	Weekly	mg/l	18	22
April 2008	DO	Daily	mg/l	6.0	5.8
May 2008	Fecal Coliform	Monthly	#/100ml	1000	1000
May 2008	Ammonia	Monthly	mg/l	1.0	2.1
May 2008	Ammonia	Weekly	mg/l	1.5	2.1
May 2008	Chlorine	Daily	mg/l	0.019	0.13
May 2008	DO	Daily	mg/l	6.0	5.2
May 2008	DO	Daily	mg/l	6.0	5.1
June 2008	DO	Daily	mg/l	6.0	5.0
June 2008	Chlorine	Daily	mg/l	0.019	0.07
June 2008	Chlorine	Daily	mg/l	0.019	0.35
July 2008	Fecal Coliform	Monthly	#/100ml	1000	25200
July 2008	Fecal Coliform	Weekly	#/100ml	2000	25200
July 2008	TSS	Monthly	mg/l	12	35
July 2008	TSS	Weekly	mg/l	18	35
July 2008	Chlorine	Daily	mg/l	0.019	0.4
July 2008	Chlorine	Daily	mg/l	0.019	0.1
August 2008	Fecal Coliform	Monthly	#/100ml	1000	2400
August 2008	Fecal Coliform	Weekly	#/100ml	2000	2400
August 2008	TSS	Monthly	mg/l	12	26
August 2008	TSS	Weekly	mg/l	18	26
August 2008	Chlorine	Daily	mg/l	6.0	5.0
September 2008	Fecal Coliform	Monthly	#/100ml	1000	12000
September 2008	Fecal Coliform	Weekly	#/100ml	2000	12000
September 2008	Ammonia	Monthly	mg/l	1.0	2.3
September 2008	Ammonia	Weekly	mg/l	1.5	2.3

Permit #: 1PT00047*AD
NPDES #: OH0046973

Attachment I					
Effluent Limit Violations for February 2004 through September 2008					
Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
September 2008	TSS	Monthly	mg/l	12	23
September 2008	TSS	Weekly	mg/l	18	23
September 2008	Chlorine	Daily	mg/l	0.019	0.2
September 2008	Chlorine	Daily	mg/l	0.019	0.1