



**Environmental
Protection Agency**

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

October 22, 2010

RE: WALNUT CREEK MENNONITE CHURCH
OHIO EPA PERMIT 3PR00425
WALNUT CREEK TWP., HOLMES COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Michael Hershberger, Director
Walnut Creek Mennonite Church
P.O. Box 182
Walnut Creek, OH 44687

Dear Mr. Hershberger:

On October 19, 2010, a site inspection was conducted at the above referenced facility at 2619 County Road 114, Walnut Creek Township, Holmes County. The inspection was conducted by John Schmidt of this office, as well as Kraig Bucklew and Vaughn Anderson of the Holmes County Health Department. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on October 29, 2008.

The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, surface sand filtration, and chlorine disinfection. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The facility discharges to Walnut Creek north of the facility. No backup power is provided to the facility, however the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 2,500 gallons per day. The extended aeration plant operates on a timer, with the sand filter operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. The content of the aeration tank had a slight earthy odor, chocolate brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. The plant color and aeration is an indicator of a properly operating aeration system.
3. The surface of the clarifier was clear. Effluent channels and weirs were in reasonable condition. The sludge return lines were operating properly at the time of the inspection. The skimmer was not operating at the time of the inspection, and only skims when the plant is attended, at the instruction of the Holmes County Health Department.

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4. Surface sand filters were clean and operable. The dosing pumps discharge to the filters when enough water accumulates to pump. The pumps were tested and found operable. The piping between the distribution box and the arms to the sand filters was observed as leaking (see attached pictures). The connection must be repaired so that it is water tight.
5. The chlorination system was stocked with appropriate chemicals and operating at the time of the inspection. The tank contents were clear.
6. The final discharge pipe at Walnut Creek north of the plant was not observed due to a lack of flow.
7. Ohio EPA understands that Kevin Dean of Kevin's Backflow Service monitors the facility, and performs the routine sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

Walnut Creek Mennonite Church operates under Permit 3PR00425*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 through October 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	5.76	12/4/2008
001	50060	Chlorine, Total Residual	1D Conc	0.019	.18	6/1/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	.11	6/15/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.66	6/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.89	8/10/2010
001	00530	Total Suspended Solids	30D Conc	12	13.	3/1/2010
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	5.65	3/9/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.65	3/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	3.8	8/3/2009

These effluent violations should be explained, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting code or reporting frequency violations were noted for the reporting period reviewed.

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If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

The following compliance schedule violations were noted for the reporting period reviewed:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
05/01/2006	04/01/2011	09/01/2006	Not Completed	01299	Construction	Submit detail plans
05/01/2006	04/01/2011	01/01/2007	Not Completed	03099	Construction	Commence construction
05/01/2006	04/01/2011	05/01/2007	Not Completed	04599	Construction	Complete construction
05/01/2006	04/01/2011	05/01/2007	Not Completed	05599	Construction	Attain final limits

From examination of Ohio EPA files and the site inspection, it is apparent that Walnut Creek Mennonite Church has not applied and obtained a permit-to-install (PTI) and completed construction of dechlorination facilities for your WWTP. A PTI must be submitted as soon as possible and construction commence as soon as an approved permit is received.

Other Violations

Ohio EPA notes the following additional violation of your NPDES permit:

1. Failure to Submit an NPDES Renewal Application – Pursuant to Part II of your NPDES permit, a renewal application must be submitted to Ohio EPA no less than 180 days prior to the expiration of your current permit. Renewal application forms and a letter were mailed to you on June 30, 2010. Ohio EPA notes that your current permit expires on April 1, 2011, requiring the application to be received in our office no later than October 1, 2010. As of the date of this letter, Ohio EPA has not received the renewal application.

Based on the above information, Walnut Creek Mennonite Church is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its WWTP; however the above items must be addressed.

Comments

Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Ohio EPA understands that West Holmes Local Schools contracts with Dean's Backflow Services as its operator of record. An examination

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of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

att: Operator of Record Notification Form, rev 02/2008

pc: Kraig Bucklew, Holmes County Health Department
Kevin Dean, Dean's Backflow Service

File: Semipublic/Holmes/Walnut Creek Twp/Walnut Creek Mennonite Church



Leaking Wastewater from Distribution Box