



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

October 30, 2007

RE: LAKE COUNTY
KIRTLAND
THE CHURCH OF JESUS CHRIST
OF LATTER DAY SAINTS
NPDES PERMIT NO. 3PR00115

NOTICE OF VIOLATION

Mr. J. Scott Gilchrist
Facilities Manager
The Church of Jesus Christ of Latter Day Saints
P.O. Box 926
Mentor, OH 44060

Dear Mr. Gilchrist:

On October 25, 2007, this writer conducted a compliance evaluation inspection of the wastewater treatment plant serving the above referenced facility. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

At the time of the inspection, all treatment units were in operation. The plant was producing an effluent of satisfactory visual quality in that the effluent was free of solids, debris, oil and grease. The following observations were noted:

- The mixed liquor suspended solids was dark brown in color.
- The settling tank content was turbid. An excessive amount of dark sludge had accumulated on the surface of the settling tank, behind the settling tank baffles and in the effluent trough. The sludge behind the baffles and in the effluent trough must be removed. Consideration should be given to increasing the sludge return rate or increasing the sludge wasting rate.
- The northern filter bed was covered with a layer of dark sludge. The southern filter bed was ponded with sludge. Once the filters drain, the dried sludge solids and any vegetation must be removed from the surface of the filter beds and replaced with clean, Ohio EPA approved filter sand. Assurances must be made that 18 inches of approved filter sand exists on both beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed.
- The dechlorinator contained no sodium bisulfate tablets.

A review of the plant's monthly operating reports, as obtained from the Surface Water Information Management System (SWIMS) electronic data base, revealed the following effluent violations during the period of September 2006 through September 2007:

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	9/5/2006
001	00530	Total Suspended Solids	30D Conc	12	22.	12/1/2006
001	00530	Total Suspended Solids	7D Conc	18	22.	12/22/2006
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	28.	12/1/2006
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	28.	12/22/2006
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.1	4/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.63	7/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.63	7/8/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	7/30/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.69	6/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.69	6/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	2.6	8/20/2007

In addition the church has been using data substitution codes (i.e., A-substitution codes) excessively and inaccurately. These codes are to be used for the *infrequent* times that data is not available for reporting. Comments must be provided in comment section stating the reason that the data is not available. Looking at the church's monthly operating reports, A-substitution codes are consistently used for parameters that require daily monitoring. The inaccurate and excessive uses of the A-substitution codes have been used for flow, odor, turbidity, color and water temperature. Data is provided for few days out of the week and A-substitution codes are used for the remaining days. *This practice must stop.* The data, as required by the NPDES permit, must be reported on the monthly operating reports.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code Chapter 6111.

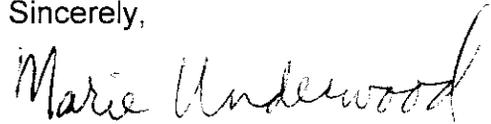
Pursuant to Ohio Administrative Code 3745-7-09, effective December 21, 2006, this Agency requires the owner and operator of record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. The records shall be housed on site and shall be accessible for twenty-four hour inspection. Some of the information that must be recorded includes the identification of the treatment works, date and times of arrival and departure for the operator of record, specific operation and maintenance activities that affect the quality or quantity of sewage or effluent produced, results of tests performed and samples taken, performance of preventative maintenance and repairs, and identification of the persons making the entries. In addition the administrative code requires any owner of a sewage treatment works who enters into a contract with a certified operator to maintain a copy of the contract onsite at the treatment works. Please carefully review Ohio Administrative Code 3745-7-09 for information on all requirements. The code can be accessed at: <http://www.epa.state.oh.us/dsw/rules/effectiverules.html>.

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Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,

A handwritten signature in cursive script that reads "Marie Underwood". The signature is written in black ink and is positioned above the typed name and title.

Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

MU/mt