



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

October 15, 2008

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 2, 2008, 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 light brown in color.
- The settling tank content was turbid. Some sludge had accumulated on the surface of the settling tank and behind the settling tank baffles. The sludge behind the baffles should be removed. Consideration should be given to increasing the sludge return rate.
- The southern filter bed was ponded with sludge and contained some vegetation. Once the filter drains, 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 chlorinator contained chlorine tablets, as required.
- The dechlorinator contained no sodium bisulfate tablets. Tablets should remain in the dechlorinator, as long as disinfection is required.

A review of the plant's Discharge Monitoring Reports revealed the following effluent violations during the period of October 2007 through September 2008:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	8/14/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.58	8/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.58	8/1/2008

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	7/31/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	4.4	7/24/2008
001	00530	Total Suspended Solids	7D Conc	18	27.	6/8/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	12.8	6/8/2008
001	00530	Total Suspended Solids	30D Conc	12	27.	6/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	12.8	6/1/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	2.2	5/29/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	4/24/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.6	4/17/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.5	11/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.2	10/29/2007

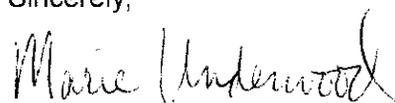
Excessive and inaccurate use of the data substitution codes (i.e., A-substitution codes) continues. These codes are to be used for the *infrequent* times that data is not available for reporting. Comments must be provided in comment section stating the reason that the data is not available. Looking at the church's monthly operating reports A-substitution codes are often times used for parameters that require daily monitoring. The inaccurate and excessive use 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 discharge monitoring 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.

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,



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

MU/mh