Environmental
Protection Agency

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

April 4, 2012

David Ruff, Operator
Saint John's Evangelical Lutheran Church
12809 St. Rt. 736
Marysville, OH 43040

Re: **Saint John's Evangelical Lutheran Church**
NPDES Permit 4PT00006/ OH0102008
Compliance Evaluation Inspection
Union County
Notice of Violation

Dear Mr. Ruff:

On March 7, 2012, a Compliance Evaluation Inspection was conducted at the Saint John's Evangelical Lutheran Church. Present for the inspection were you, the daily operator, Pat Hickman, the operator of record, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

Findings:

1. Attached are compliance tables between March 2011 and February 2012. In 10 months there were effluent violations. Ammonia, dissolved oxygen, and chlorine are the most frequent violations. Due to the frequency and magnitude of the violations, **this letter serves as a Notice of Violation**.

2. During the inspection, the WWTP smelled of ammonia and the aeration tank did not have much agitation occurring. Additionally, one of the sand filters was partially ponded. Mr. Ruff indicated that the sand filters required frequent scrapings. These problems lead me to believe that there is incomplete conversion where sewage is not properly being converted to bacteria. Mr. Hickman wondered if the diffuser head was broken and suggests pumping the WWTP to look at the piping and make any necessary repairs. Repairs which promote full conversion should reduce the amount of time needed scraping the sand filters.

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

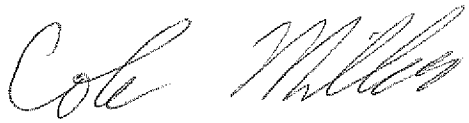
614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

3. The operators indicate that the dissolved oxygen violations likely occur because the manner in which the sampler takes samples normally loosens the post-aeration piping. The piping also is not secured and may loosen during standard operation.

4. I understand that there is no marker near the outfall. The NPDES permit requires a marker on the stream bank of the outfall. My understanding is that the discharge point is far from the WWTP and may be on another property. You should attempt to get permission to place the marker at the discharge point. If not I request a letter from the owner which denies the request.

Attached is the Compliance Evaluation Inspection checklist. **A written response is requested by May 4, 2012, which addresses what will be done to reduce additional violations.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.ohio.gov.

Sincerely,



Cole Miller
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

EC: Cole Miller

CM/nsm 3-6-2012 St. Johns Lutheran CEI

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PT00006	OH0102008	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
3/7/2012	2:00 PM	2:30 PM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Saint John's Evangelical Lutheran Church 12809 St. Rt. 736 Marysville, OH 43040	7/1/2007
	Permit Expiration Date
	6/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
David Ruff, Operator Pat Hickman, Operator of Record	
Name and Title of Responsible Official	Phone Number
David Ruff, Operator	(614) 481-4190

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Frequent effluent violations occur.
M	Operations & Maintenance	
M	Facility Site Review	
S	Collection System	
S	Flow Measurement	
N	Receiving Waters	
N	Laboratory	

Comments:

Signatures	
Cole Miller 4/3/12	for 4/3/12
Cole Miller, Inspector Date Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Date Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Saint John's Evangelical Lutheran Church between 3/1/2011 to 2/1/2012

Summary
Permit Effluent Limit Violations: 44
Permit Effluent Code Violations: 2
Permit Effluent Frequency Violations: 6
Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.	4/1/2011
April 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.	4/4/2011
May 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.3	5/1/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	.06	5/2/2011
May 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	5/16/2011
June 2011	001	Total Suspended Solids	30D Conc	12	18.	6/1/2011
June 2011	001	Fecal Coliform	30D Conc	1000	1400.	6/1/2011
June 2011	001	Chlorine, Total Residu	1D Conc	0.019	.07	6/1/2011
June 2011	001	Dissolved Oxygen	1D Conc	6.0	5.2	6/1/2011
June 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	6/13/2011
June 2011	001	Dissolved Oxygen	1D Conc	6.0	5.8	6/20/2011
June 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	6/27/2011
July 2011	001	Fecal Coliform	30D Conc	1000	1100.	7/1/2011
July 2011	001	Chlorine, Total Residu	1D Conc	0.019	.06	7/6/2011
July 2011	001	Chlorine, Total Residu	1D Conc	0.019	.05	7/11/2011
July 2011	001	Dissolved Oxygen	1D Conc	6.0	4.9	7/11/2011
July 2011	001	Chlorine, Total Residu	1D Conc	0.019	.07	7/25/2011
July 2011	001	Dissolved Oxygen	1D Conc	6.0	5.1	7/25/2011
August 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	2.8	8/1/2011
August 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.8	8/1/2011

August 2011	001	Chlorine, Total Residu	1D Conc	0.019	.1	8/1/2011
August 2011	001	Dissolved Oxygen	1D Conc	6.0	4.	8/1/2011
August 2011	001	Dissolved Oxygen	1D Conc	6.0	5.6	8/29/2011
September 2011	001	Total Suspended Solids	30D Conc	12	16.	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	6.4	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.03634	9/1/2011
September 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	6.4	9/7/2011
September 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.02	.03634	9/7/2011
September 2011	001	Chlorine, Total Residu	1D Conc	0.019	.08	9/12/2011
September 2011	001	Chlorine, Total Residu	1D Conc	0.019	.21	9/26/2011
October 2011	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	22.9	10/1/2011
October 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.013	.07801	10/1/2011
October 2011	001	Dissolved Oxygen	1D Conc	6.0	5.9	10/3/2011
October 2011	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	22.9	10/3/2011
October 2011	001	Nitrogen, Ammonia (NH3	1D Qty	0.02	.07801	10/3/2011
October 2011	001	Dissolved Oxygen	1D Conc	6.0	4.3	10/24/2011
October 2011	001	Dissolved Oxygen	1D Conc	6.0	5.5	10/31/2011
November 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	23.6	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3	30D Qty	0.040	.0536	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3	1D Conc	4.5	23.6	11/7/2011
November 2011	001	Dissolved Oxygen	1D Conc	6.0	1.6	11/14/2011
November 2011	001	Dissolved Oxygen	1D Conc	6.0	4.1	11/21/2011
December 2011	001	Dissolved Oxygen	1D Conc	6.0	3.9	12/12/2011
January 2012	001	Dissolved Oxygen	1D Conc	6.0	1.6	1/30/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
May 2011	001	Fecal Coliform	AK	5/2/2011
September 2011	001	Fecal Coliform	AK	9/7/2011

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2011	001	Dissolved Oxygen	1/Week	1	0	8/15/2011
August 2011	001	Chlorine, Total Residu	1/2Weeks	1	0	8/15/2011
December 2011	001	Color, Severity	1/Day	1	0	12/31/2011
December 2011	001	Odor, Severity	1/Day	1	0	12/31/2011
December 2011	001	Turbidity, Severity	1/Day	1	0	12/31/2011
December 2011	001	Flow Rate	1/Day	1	0	12/31/2011

Flow Data for Saint John's Evangelical Lutheran Church between 3/1/2011 and 2/1/2012

	Date	Flows (MGD)
Ten Highest Flows	4/5/2011	0.002
	4/7/2011	0.002
	4/13/2011	0.002
	4/21/2011	0.002
	4/22/2011	0.002
	4/29/2011	0.002
	5/5/2011	0.002
	5/11/2011	0.002
	5/26/2011	0.002
	6/8/2011	0.002
Average Flow Rate		0.001

SECTION D: PERMIT VERIFICATION

(a) Correct name and mailing address of permittee ..... Y
(b) Correct name and location of receiving waters ..... Y
(c) Products and production rates conform with permit application ..... Y
(d) Flows and loadings conform with NPDES permit ..... Y
(e) Treatment processes are as described in permit application ..... Y
(f) New treatment process added since last inspection ..... N
(g) Notification given to State of new, different or increased discharges ..... Y
(h) All discharges are permitted ..... Y
(i) Number and location of discharge points are as described in permit ..... Y

Comments:

SECTION E: COMPLIANCE

(a) Any significant violations since the last inspection ..... Y
(b) Permittee is taking actions to resolve violations ..... N*
(c) Permittee has a compliance schedule ..... N
(d) Permittee is meeting compliance schedule ..... N/A

Comments: The Permittee has made some repairs on the treatment system but violations continue to occur.

SECTION F: OPERATION AND MAINTENANCE

(a)	Standby power available	N
	If yes, what type?	
(b)	Adequate alarm system available for power or equipment failures	Y
(c)	All treatment units in service other than backup units	Y
(d)	Wastewater Treatment Works classification	A
(e)	Operator of Record holds unexpired license of class required by Permit	Y
	Class held: III	
(f)	Copy of certificate of Operator of Record displayed on-site	N
(g)	Minimum operator staffing requirements fulfilled	Y
(h)	Routine and preventative maintenance scheduled and performed	Y
(i)	Any major equipment breakdown since last inspection	N
(j)	Operation and maintenance manual provided and maintained	N/E
(k)	Any plant bypasses since last inspection	N
(l)	Regulatory agency notified of bypasses	N/A
	By MOR ☐ and/or Spill Hotline (1-800-282-9378) ☐	
(m)	Any hydraulic or organic overloads since last inspection	N

Comments:

KEY: Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated, * Further comment included in attachment

SECTION G: RECORD KEEPING

a) Log book provided ..... Y
b) Format of log book (i.e. computer log, hard bound book)
Hard bound book
c) Log book(s) kept onsite in an area protected from weather ..... Y
d) Log book contains the following:
   i) Identification of treatment works ..... Y
   ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 ..... Y
   iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) ..... Y
   iv) Laboratory results (unless documented on bench sheets) ..... Y
   v) Identification of person making log entries ..... Y
e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? .... Y

Comments:

SECTION H: COLLECTION SYSTEM

a) Percent combined system: 0
b) Any collection system overflows since last inspection ..... N
   CSO ☐ SSO ☐
c) Regulatory agency notified of overflows ..... N/A
d) CSO O&M plan provided and implemented ..... N/A
e) CSOs monitored and reported in accordance with permit ..... N/A
f) Portable pumps are used to relieve system ..... N/A
g) Lift station alarms provided and maintained ..... N/E
h) Lift stations equipped with permanent standby power or equivalent ..... N/E
i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection ..... N
j) Any complaints received since last inspection of basement flooding ..... N
k) Are any portions of the sewer system at or near capacity ..... N/A
l) Are operations changed during high-flow events? ..... N

Comments:

SECTION I: SLUDGE MANAGEMENT

a) Sludge management plan (SMP) last audited by Ohio EPA:..... N/A
Audit Date:

b) Sludge adequately disposed ..... N/E
Method:

c) If sludge is incinerated, where is ash disposed of ..... N/A

d) Is sludge disposal contracted ..... *
Name: Ty Clarridge

e) Has amount of sludge generated changed significantly ..... N

f) Adequate sludge storage provided at plant ..... N/A

g) Records kept in accordance with State and Federal law..... N/E

h) Any complaints received last year regarding sludge ..... N

i) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments: Sludge has not been hauled off in the past year but the facility is going to haul most of the plant soon.

SECTION J: SELF-MONITORING PROGRAM

a) Primary flow measuring device operated and maintained ..... Y
Type of device: Hour meter Device location: Dosing tanks

b) Calibration frequency adequate..... N/A
Date of last calibration:

c) Secondary instruments operated and maintained ..... Y

d) Flow measurements equipment adequate to handle full range of flows .... Y

e) Actual flow discharged is measured ..... Y

f) Flow measuring equipment inspection frequency _____ N/E

g) Sampling location(s) are as specified by permit ..... Y

h) Parameters and sampling frequency agree with permit..... Y

i) 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) ..... N/E

Comments:

SECTION K: Laboratory

a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... N/E
b) If alternate procedures are used, are they properly approved? ..... N/E
c) Analysis performed more frequency ..... N
   If yes, are results recorded in permittee's report? ..... N/A
d) Commercial laboratory used:
   Name: MASI
   Parameters analyzed: All
e) Quality assurance manual provided and maintained ..... N/E
f) Calibration and maintenance of instruments is satisfactory? ..... N/E
g) Results of last U.S. EPA quality assurance ..... N/A
   Date:

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No	N/E	N/E	N/E	N/E	N/E	N/E	

Comments:
The sand filters were ponded and there wasn't much flow. The clarifier effluent looked gray and did not appear to be well-treated effluent.

SECTION M: MULTIMEDIA OBSERVATIONS

a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
b) Do you notice staining or discoloration of soils, pavement or floors ..... N
c) Do you notice distressed (unhealthy, discolored, dead) vegetation..... N
d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
e) Do you notice any unusual odors or strong chemical smells ..... N
f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

1) What is the cause of the condition?
2) Is the observed condition or source a waste product?
3) Where is the suspected contaminant normally disposed?
4) Is this disposal permitted?
5) How long has the condition existed and when did it begin?

Comments: