



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 9, 2012

RE: TRUMBULL COUNTY
SOUTHINGTON TOWNSHIP
SOUTHINGTON CHRISTIAN CHURCH
OHIO EPA PERMIT NO. 3GS00022
NPDES PERMIT NO. OHS000003

Randall Riley, Pastor
Southington Christian Church
3285 S.R. 534
Southington, Ohio 44470

Dear Pastor Riley:

Ohio EPA and the Trumbull County Health Department conducted a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on July 5, 2012. Mr. Steve Kramer represented the Trumbull County Health Department and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The existing wastewater treatment system was sized for 300 gpd, and consists of two 1,000-gallon septic tanks in series, a dose tank, 60-square foot recirculating sand filter, and chlorination/dechlorination chamber. Treated effluent is discharged to an unnamed tributary of Dead Branch.

During the inspection, the following observations and/or deficiencies were noted:

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment components appeared to be in working condition.
2. Please rearrange the positioning of the outfall marker so that it is visible from the receiving stream. Alternatively, a double-sided sign may also be installed.
3. A bound and numbered logbook should be used to record all operation and maintenance activities at the plant. Plant operation and maintenance personnel shall record the date, arrival/departure times, a description of the work performed, and their initials.
4. Please provide verification that a spare dose pump is being kept onsite.
5. Part IV, H of the NPDES permit requires that the permittee designate a certified operator to oversee the technical operation and maintenance of the treatment works. While this office understands that Mr. Charles Church is the current operator for the facility, this office has no documentation on record reflecting this. Please complete and submit the enclosed Operator of Record Notification (ORC) form to meet this requirement.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period April 2010 through June 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2011	005	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	26.1	9/1/2011
September 2011	005	31616	Fecal Coliform	30D Conc	1000	1200.	9/1/2011
September 2011	005	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	26.1	9/22/2011

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2010	005	00530	Total Suspended Solids	1/Year	1	0	09/01/2010
September 2010	005	00610	Nitrogen, Ammonia (NH3)	1/Year	1	0	09/01/2010
September 2010	005	31616	Fecal Coliform	1/Year	1	0	09/01/2010
September 2010	005	80082	CBOD 5 day	1/Year	1	0	09/01/2010
September 2010	005	50060	Chlorine, Total Residu	1/Year	1	0	09/01/2010
September 2010	005	00300	Dissolved Oxygen	1/Year	1	0	09/01/2010

In addition to the above, our review of the facility's data reporting procedures noted that Mr. Charles Church has also been submitting the eDMR data. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 Code of Federal Regulations (CFR) 122.22". 40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

A person is a duly authorized representative if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

Based on the requirements outlined in 40 CFR 122.22, Mr. Church may not submit eDMR data on behalf of Southington Christian Church until the ORC form has been completed and submitted, and a Delegation of Authority Form has been completed and submitted.

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A Delegation of Authority Form must be completed to indicate that Southington Christian Church agrees to have Mr. Charles Church submit and certify reporting data on the church's behalf. Please contact Mr. James Roberts of Ohio EPA at (614) 644-2054 to ensure that the Delegation of Authority requirement is met.

This office also noticed that Southington Christian Church reports a single flow number for all days of a month. Please provide an explanation as to how daily flow values are determined, as the NPDES permit requires that flow values are estimated on a daily basis.

Please inform this office, in writing, within 14 days' receipt of this notification, of the actions taken or proposed to address the above-referenced violations and/or deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Should you have any questions or concerns regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



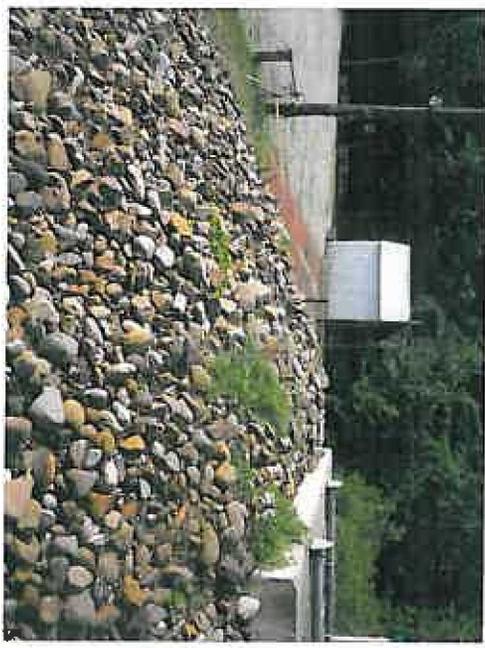
Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs
ORC Form

cc: Steve Kramer, R.S., Trumbull County Health Department

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Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #: _____ STU # _____ Classification: _____

 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by: _____	Date of SDWIS update: _____
Date of Compliance Status Letter: _____	