



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

October 23, 2012

RE: BETHEL BIBLE CHURCH
OHIO EPA PERMIT 3GV00036/OHV000002
JEFFERSON TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Pastor Joseph Lang
Bethel Bible Church
Bethel Christian School
571 Goodale Road
Jefferson, Ohio 44047

Dear Pastor Lang:

On October 22, 2012, a site inspection was conducted at the above referenced facility at 571 Goodale Road, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, accompanied by Ms. Suzanne Westlake of Smolen Engineering representing Bethel Bible Church. 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. This is the first compliance inspection for this facility.

According to Ohio EPA files, there are two onsite wastewater systems that serve existing structures. The former church building contains a 750-gallon septic tank followed by a distribution box and 300 feet of tile field consisting of four 75-foot laterals. Each lateral has an 8-foot section of filter sand. The tile system does not have a pipe discharge. The parsonage is served by a 1,000-gallon septic tank followed by a splitter box and two 360 square foot subsurface sand filters, followed by another junction box prior to a pipe discharge to the roadside ditch along Goodale Road. The ditch along Goodale Road discharges to an unnamed tributary to Cemetery Creek.

Observations and Notations

Following are observations and notations made during the inspection:

1. The design flow of the church treatment system is 750 gallons per day, however, actual flow is significantly less. The building is used for small meetings (6-7 people) that meet weekly. The parsonage is a three-bedroom home, with a design flow of 360 gpd.
2. The area that contains the subsurface sand filters from the parsonage wastewater system is currently being used for a playground and paddock area for a small pony. Manure and urine from the pony could adversely impact the function of the sand filter. Therefore, grazing animals should not be allowed on top of the subsurface sand filters.
3. The final discharge from the systems could not be observed due to lack of flow. The roadside ditch that runs along the south side of the property is piped over, and no evidence of flow was observed at the downstream side of the ditch.
4. No analytical data has been submitted as required by the NPDES permit for this facility.
5. No outfall signage could be located at Outfall 001.

NPDES Permit Compliance Review

The Bethel Bible Church and Parsonage operates under NPDES General Permit OHV000002/5PGS0002, with a facility I.D. of 3GV00036*AG as of December 1, 2010. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period December 1, 2010 through October 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit, noted as follows:

Limit Violations

No limit violations were noted for the period reviewed. It should be noted that the current permit does not contain any permit limits.

Reporting Violations

Ohio EPA notes that it has not received any analytical data since this permit was issued on December 1, 2010. Page 6 of your NPDES permit requires some parameters to be estimated on a daily basis, while laboratory analytical data is required to be reported annually in September except winter ammonia, which may be collected anytime between November and April of any given year. Monitoring data must be reported as prescribed by Part V, Item L of your permit (page 17). Every December, you must provide written notification if sludge was removed from the facility and where the sludge was hauled to as prescribed by Part IV, Item D of your permit (page 9). Please provide an explanation as to why the required data was not provided.

Compliance Schedule Violations

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

Permit Effective Date	Permit Expiration Date	Applied Coverage Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
1/1/10	12/31/14	12/1/10	6/1/10	Incomplete	01299	Construction	Submit PTI
1/1/10	12/31/14	12/1/10	3/1/11	Incomplete	01899	Construction	Advertise for Bids
1/1/10	12/31/14	12/1/10	6/1/11	Incomplete	03099	Construction	Commence Construction
1/1/10	12/31/14	12/1/10	6/1/13	Incomplete	04599	Construction	Complete Construction
1/1/10	12/31/14	12/1/10	12/1/13	Incomplete	56599	Construction	Achieve Final Limits

Discussions with your consultant indicated that Ohio EPA can expect a PTI for proposed plant improvements within the next 30 days. Please note that missing milestones by more than two months places this facility in **significant noncompliance**, which could subject this facility to escalated enforcement.

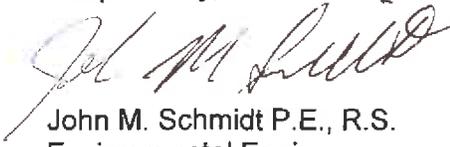
Other Violations

1. Outfall Signage: Pursuant to Part IV, Item I of your permit, you are required to post a permanent marker along the stream bank at each outfall under this NPDES permit where a marker does not currently exist. Please see page 11 of your NPDES permit for details.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions 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,

A handwritten signature in black ink, appearing to read "John M. Schmidt". The signature is written in a cursive style with a large initial "J" and "S".

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

JMS/cs

cc: Suzanne Westlake, Smolen Engineering

File: SP/Ashtabula/Jefferson Twp./Bethel Bible Church (3GV00036)