



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

December 14, 2012

RE: GEAUGA COUNTY
MUNSON TWP
NDCL HS
NPDES PERMIT #3PT00028

Sister Jacquelyn Gusdane, SND
Notre Dame Cathedral Latin High School
13000 Auburn Road
Chardon, Ohio 44024

Dear Sister Gusdane:

On December 13, 2012, this writer met with Mr. Tony Bozeglav to conduct an inspection of the sewage treatment system serving the wastewater treatment plant (WWTP) serving the above noted facility.

The intent of the inspection was to assess the operations and maintenance of the treatment system and notify you of the expired National Pollutant Discharge Elimination System (NPDES) permit. The NPDES for Notre Dame Cathedral Latin (NDCL) HS expired September 30, 2012. At the time of the inspection, the school was working on the renewal application and the final submittal to Ohio EPA was expected to be completed within the next week.

According to Agency records, the existing wastewater system consists of a trash trap, flow equalization tank, aeration tank, clarifier, dosing chamber, surface sand filters, chlorination, dechlorination, sludge holding tank and sludge drying beds. The treatment plant appeared to be well maintained and operated at the time of the inspection. The WWTP was designed to treat 15,000 gpd with flow records showing an average daily use around 3,424 gpd.

At the time of the inspection, the WWTP was well maintained and was producing what appeared to be a satisfactory quality effluent.

NPDES PERMIT COMPLIANCE

NDCL are in non-compliance for failure to submit a renewal NPDES permit application. Your NPDES permit expired September 30, 2012. Your renewal application was due to this office 180 days prior to the expiration date. Discharging without an effective NPDES permit is a violation of Ohio Revised Code (ORC) 6111 and subject to enforcement actions.

It is understood the facility has no record of receiving the renewal NPDES permit notice from Ohio EPA. At the time of the inspection, the renewal NPDES permit application was being prepared and it was estimated the completed application and fee would be submitted within the next week. The renewal NPDES permit application must be submitted to this office by December 31, 2012

According to the discharge monitoring report data from January 1, 2010 through October 31, 2012 the flow reported averaged 3,424 gpd. Discharge monitoring report data was reviewed for compliance with the current NPDES permit. A violation summary for the above noted review period is shown below:

Frequency Violations

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	4.06	7/11/2012
August 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	5.71	8/7/2012

Any reporting errors or eDMR errors must be reported to the Ohio EPA so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly

The WWTP is currently classified by the Ohio EPA as a Class I wastewater treatment works. Upon NPDES permit renewal, the WWTP will be reclassified as a Class A wastewater treatment works. According to Agency records, Mr. Tony Bozeglav is listed as the Operator of Record for this facility.

INSPECTION SUMMARY

Below are the findings and recommendations from the inspection:

At the time of the inspection, the treatment system was in satisfactory condition and was producing a satisfactory clear effluent. There is food preparation completed onsite at the school kitchen. It is understood the grease trap is pumped approximately every three months and the trash trap is pumped approximately three times a year.

The contents of the aeration tanks were chocolate brown and appeared to be provided with a satisfactory amount of air supply. A satisfactory amount of mixing was noted within the aeration tanks. The sludge return lines were in operation. The flow equalization tank was in good condition and was provided with an adequate supply of air.

The clarifier was in satisfactory condition. There was a minor accumulation of solids on the surface of the tank. The skimmer was visible and the effluent from the tank appeared clear. It is understood all sidewalls are scraped down once a week and the weirs are washed down periodically.

The sludge holding tank was in good condition and was provided with satisfactory aeration. The sludge drying beds were not in use at the time of the inspection. If the facility chooses to utilize the drying beds, the facility must use Station 586 in the NPDES permit to monitor when sludge is removed from the drying beds and disposed of by hauling to a landfill. If you have any questions regarding the Ohio EPA Sewage Sludge Management Program requirements for your facility, please contact Mr. Chris Moody at (330) 963-1118.

The surface sand filters were in satisfactory condition with effective dosing of the filters was noted. There was some flooding noted on the surface of the filter at the time of the inspection. The flooding may be caused by the filter needing to be cleaned. The filters should be cleaned routinely to remove solids and other vegetative growth that may accumulate in the filter media.

It was noted the dosing station piping that feeds the distribution box to the sand filter is subject to freezing due to the long run of pipe located on the ground. During the inspection, a new location for the influent chamber and distribution piping was proposed. This office agrees the current piping schematic and design poses a potential threat to the efficiency of the surface sand filter. As such, this office has no objection to the facility rerouting the distribution piping to provide a more efficient use of the sand filters.

Please note, according to Ohio Revised Code 6111.44, "any changes or upgrades to a sewerage treatment must not be completed until the plans therefore have been submitted to and approved by the director of environmental protection." It is understood the proposed changes to the sand filter will not affect the treatment capacity of the system and therefore will not require a PTI application.

SUMMARY

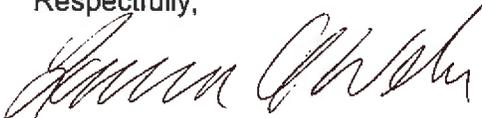
In summary, the following items must be completed within the required deadline:

- 1) The NPDES permit for the Notre Dame Cathedral Latin HS has expired. You must submit the completed NPDES permit application, along with the \$200 application fee, to this office as soon as possible but no later than December 31, 2012. Continued non-compliance by your facility will result in this matter being referred to our Legal Section for an enforcement action.

This office will begin working on the renewal permit once the complete NPDES application is received by this office. When completed, your NPDES renewal permit will be drafted and public noticed. Once the permit is public noticed, you will have 30 days to make any comments.

Should you have any comments or questions regarding this letter, please contact this office at (330)963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

cc. Mr. Tony Bozeglav, NDCL
Geauga County Health Department