



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

December 18, 2012

RE: GEAUGA COUNTY
MUNSON TWP
SISTERS OF NOTRE DAME ELEM
NPDES PERMIT #3PR00066 #CD

Sister Debra Doig
Sisters of Notre Dame
13000 Auburn Road
Chardon Ohio 44024

Dear Sister Doig:

On December 13, 2012, this writer met with you to review National Pollutant Discharge Elimination System (NPDES) permit files and conduct an inspection of the sewage treatment system serving the facility. The intent of the inspection was to assess the operations and maintenance of the treatment system and notify you of the expired NPDES permit. The NPDES for Notre Dame Education Center expired July 31, 2012.

At the time of the inspection, a renewal NPDES permit application had not been submitted to this office. It is understood the school will be working on the renewal application and the final submittal to Ohio EPA is expected to be completed Thursday December 20, 2012.

According to Agency records, the existing wastewater system consists of a 3,500 gallon trash trap, 16,000 gallon flow equalization tank, 40,000 gallon extended aeration system, 96 square foot fixed media clarifier, ultraviolet disinfection and 13,000 gallon sludge holding tank. The system was designed to serve 450 students and 290 residents for the convent and infirmary.

The following is a summary of the inspection, compliance history, and review of the NPDES modification application.

NPDES PERMIT COMPLIANCE

You are in non-compliance for failure to submit a renewal NPDES permit application. Your NPDES permit expired July 31, 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. The renewal NPDES permit application was forwarded to the facility and it is understood the application is being prepared and is estimated to be submitted to Ohio EPA December 20, 2012. To avoid an enforcement action, the renewal NPDES permit application must be submitted to this office no later than December 31, 2012

According to the discharge monitoring report data from January 1, 2010 through October 31, 2012, the flow reported averaged 14,965 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:

DISCHARGE VIOLATIONS

REPORTING PERIOD	STATION	REPORTING CODE	PARAMETER	LIMIT TYPE	LIMIT	REPORTED VALUE	VIOLATION DATE
APRIL 2011	001	00610	NITROGEN, AMMONIA (NH3	30D CONC	1.0	1.71	4/1/2011
APRIL 2011	001	00610	NITROGEN, AMMONIA (NH3	1D CONC	1.5	8.34	4/12/2011
APRIL 2011	001	00610	NITROGEN, AMMONIA (NH3	1D QTY	0.23	.59977	4/12/2011
MAY 2012	001	00610	NITROGEN, AMMONIA (NH3	1D CONC	4.5	9.92	5/9/2012

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

INSPECTION SUMMARY

At the time of the inspection, the treatment system was in operation and producing what appeared to be a satisfactory effluent.

The influent monitor appeared to be in operation. The flow equalization tank was in satisfactory condition and there appeared to be an adequate amount of air provided to the tank. The aeration tanks contained a liquid that appeared to have a good chocolate brown color with some foam present. The tanks were provided with adequate air supply and there was adequate rollover within the tanks. The sludge return lines were in operation. The aeration tanks were very full at the time of the inspection and the sludge return was causing splashing that was above the level of the tank grating.

The clarifiers were in operation but were not in satisfactory maintenance condition. The clarifiers were loaded with solids. The scum baffle contained caked solids and the surface of one clarifier contained floating solids and the weir contained solids buildup. The effluent from this clarifier appeared slightly turbid. The other clarifier was full of caked solids and no liquid was visible in the tank. The caked solids were up to the height of the effluent weir. There was no effluent noted from this clarifier. Some grease was noted in both clarifiers. The skimmer was only visible in one clarifier.

The cause of the solids accumulation and floating grease must be evaluated. It is understood all grease is intercepted at the grease trap which is located at the headworks of the treatment plant. It is possible the grease trap and trash trap will need to be pumped out more frequently. In addition, the system should be wasting solids frequently and pumping solids out of the system. The frequency of solids removal from the system was not known at the time of the inspection.

The sludge holding tank was in operation and appeared to be full. The tank was provided with air at the time of the inspection.

The fixed media clarifiers were in operation and appeared to be somewhat turbid at the time of the inspection. There were solids accumulating on the surface of the media. The effluent from the fixed media clarifiers was clear.

The surface sand filters were in operation and one filter appeared to be in satisfactory condition. The filter in use at the time of the inspection was flooded and there appeared to be solids accumulating on the sand media.

The Ultraviolet disinfection was in operation. The system is not required to disinfect after October 31st. Please update this office as to the typical run time for the Ultraviolet disinfection

system and the routine maintenance that is completed each year. The final effluent appeared to be clear and satisfactory.

An operator log is a requirement of the operator certification rule and is required per your NPDES permit and Ohio Administrative Code (OAC) 3745-7-09. At the time of the inspection, the current operator log book was not located onsite.

Records required pursuant to OAC 3745-7-09(A) (3) are not being maintained at the facility and were not available for inspection as required by rule. The records must be accessible onsite for twenty-four hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A) (2). The facility Owner and Operator are both responsible to make sure that the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. The log must include inspection dates with time in and time out, clearly identify who is logging time at the facility, and list all activities being performed during the visit. In addition to the log book, a copy of the contract with your Operator of Record (ORC) must be maintained at the site. You and your ORC must also submit a new ORC notification form to Ohio EPA's Operator Certification Unit as indicated on the form, which must include all ORCs who inspect this facility. As a courtesy, please provide a copy of the revised ORC form to this office for our records.

SUMMARY

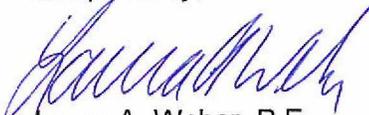
In summary, the following items must be completed within the required deadline:

- 1) The NPDES permit for the Notre Dame Education Center 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.
- 2) Review wastewater treatment plant operations and ensure that solids are removed from the treatment system as needed.
- 3) Provide an operator log book and ensure compliance with all operator requirements per your NPDES permit and OAC 3745-7-09.

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: Geauga County Health Department