



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

January 22, 2013

RE: GEAUGA COUNTY
RUSSELL TWP
RIVERVIEW CHURCH
NPDES PERMIT 3PR00222

NOTICE OF VIOLATION

Ms. Alicia Hess
Riverview Church
13968 Chillicothe Road
Novelty, OH 44072

Dear Ms. Hess:

On January 10, 2013, this writer conducted a limited scope site records inspection at the above referenced facility located at 13968 Chillicothe Road, Russell Township, Geauga County. An inspection of the wastewater treatment plant (WWTP) operations and maintenance was also conducted. The purpose of the inspection was to evaluate the facility's operations and maintenance records with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and Ohio Administrative Code (OAC) Rule 3745-7-09 for the time period of October 1, 2012 through October 14, 2012.

The inspection revealed that 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 24-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.

Based upon a lack of a log book to document visits by your ORC, Riverview Church is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, OAC 3745-7-02 for not listing all ORCs, OAC 3745-7-09 for not maintaining a facility log book, and OAC 3745-33 for not meeting permit conditions, specifically Part II, Item A that requires that this facility be overseen by an ORC.

NPDES PERMIT COMPLIANCE

According to the discharge monitoring report (DMR) data from January 1, 2010 through January 1, 2013, flow reported averaged 3,352 gpd. The facility has not submitted any DMR's since December 2011. As such, the facility is in violation of the NPDES permit for failing to monitor the effluent and failing to submit discharge monitoring report data. You must begin monitoring the effluent and submitting DMR data immediately to prevent this matter being referred for an enforcement action.

DMR data for the same review period was reviewed for compliance with the current NPDES permit. A violation summary for the above noted review period is shown below:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2011	001	00530	Total Suspended Solids	30D Qty	0.189	.23357	8/1/2011

INSPECTION SUMMARY

The WWTP was in operation at the time of the inspection. The blower was in operation and the aeration tank appeared to be provided with a satisfactory amount of air. The air circulation in the tank appeared to be satisfactory. The aeration tanks were full at the time of the inspection and the sludge return was in operation and running slightly clear. The mixed liquor in the aeration tank was a slight gray color. The skimmer return was in operation. The clarifier appeared murky and there was a slight septic odor surrounding the system at the time of the inspection. The dosing chamber appeared to be in satisfactory condition. The surface sand filters appeared to be flooded and frozen over at the time of the inspection. The disinfection system was not in operation as this is outside of disinfection season. Your NPDES permit contains both chlorine and bacteria limits which require you to chlorinate (and subsequently dechlorinate) from May through October each year. The final effluent was clear and the final outfall appeared to be in satisfactory condition.

The NPDES permit for this facility includes a compliance schedule located within Part I, C. The compliance schedule is for the submittal of a PTI for upgrades to the disinfection system at this facility. The compliance schedule includes an evaluation of your disinfection facilities for compliance with the new E.coli bacteria limit. The new E.coli bacteria limit is in the final effluent limits and monitoring requirements table (outfall 001) which was effective September 1, 2012. To date, this office has not received any updates regarding the compliance schedule or a PTI for the disinfection system.

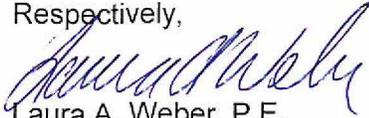
Your wastewater treatment system qualifies as a Class A Wastewater Treatment system. Our records indicate Steve Howe, Charles Newman and Donald Velisek of AKE laboratory are the certified operator of record (ORC) for this facility.

Please inform this office, in writing, within 14 days of the date of this letter as to the actions we discussed 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.

RIVERVIEW CHURCH
JANUARY 22, 2013
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If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1299.

Respectively,



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

LAW/cs

Pc: AKE Environmental & Construction Services, Inc.
Geauga County Health Department, Att: Dave Sage

File: Geauga/Russell Twp/3PR00222