



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

April 4, 2013

RE: TRUMBULL COUNTY
GREENE TOWNSHIP
GREENE CHURCH OF THE NAZARENE
NPDES GENERAL PERMIT NO. OHS000003
OHIO EPA PERMIT NO. 3GS00023

Karen Anderson, Pastor
Greene Church of the Nazarene
8916 State Route 46
North Bloomfield, Ohio 44450

Pastor Anderson:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on March 28, 2013. The inspection was conducted to evaluate the overall operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

The existing treatment system is a prefabricated, aerobic treatment system, and consists of a 490-gallon trash trap, a 750-gpd aerobic treatment unit, a 525-gallon dosing/equalization tank, and a UV disinfection unit. Treated effluent is discharged to a nearby roadside ditch that is tributary to Mosquito Creek.

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

1. The overall operation and maintenance of the treatment works appeared to be marginal.
2. A bound and numbered logbook was not observed at the facility. Please ensure that a bound and numbered logbook is maintained on site, and used to document all operation and maintenance activities at the treatment plant. Plant operation and maintenance personnel should log their time in and out, the date, a brief description of the work performed, and their initials.
3. The wastewater in the treatment systems appears to be black in color – indicative of possible septic conditions.
4. The aerator did not appear to be functional. Please have it evaluated for functionality, and repaired immediately if necessary.
5. The high level indicator did not appear to be functional. Please have it evaluated for functionality, and repaired immediately if necessary.
6. Part IV, I of the facility's NPDES permit requires that an outfall sign be erected no later than four months from the effective date of this permit, which was April 1, 2010. During

the inspection, no such outfall sign was observed. Please refer to the referenced section of the NPDES permit for specific language regarding the requirements for placing and sizing the sign. The NPDES permit can be accessed and downloaded from the following weblink:

http://www.epa.ohio.gov/portals/35/permits/SmallSanitary_Final_GP_dec09.pdf

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period April 2010 – March 2013 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3GS00023*AG	September 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	39.5	9/1/2011
3GS00023*AG	September 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	39.5	9/1/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/1/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/2/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/3/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/4/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/5/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/6/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/7/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/8/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/9/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/10/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/11/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/12/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/13/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/14/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/15/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/16/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/17/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/18/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/19/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/20/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/21/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/22/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/23/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/24/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/25/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/26/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/27/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/28/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/29/2010
3GS00023*AG	October 2010	001	00083	Color, Severity	1/Day	1	0	10/30/2010

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3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/18/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/19/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/20/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/21/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/22/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/23/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/24/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/25/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/26/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/27/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/28/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/29/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/30/2010
3GS00023*AG	October 2010	001	01350	Turbidity, Severity	1/Day	1	0	10/31/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/1/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/2/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/3/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/4/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/5/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/6/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/7/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/8/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/9/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/10/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/11/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/12/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/13/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/14/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/15/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/16/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/17/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/18/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/19/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/20/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/21/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/22/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/23/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/24/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/25/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/26/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/27/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/28/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/29/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/30/2010
3GS00023*AG	October 2010	001	00056	Flow Rate	1/Day	1	0	10/31/2010
3GS00023*AG	September 2011	001	50060	Chlorine, Total Residu	1/Year	1	0	9/1/2011

This office has not received any type of reporting or effluent sampling data since September 2011. Non-submittal notices have been repeatedly sent to the facility advising you of the missed reporting periods. Due to the missing reporting and effluent sampling data, the facility is considered to be in **significant noncompliance** with the terms and conditions of the NPDES permit.

As such, you must immediately have an effluent sample collected and then analyzed by a laboratory in accordance with Table 005 on Page 13 of the NPDES permit. The results of the analysis must be submitted to Ohio EPA electronically via the eDMR system. Dissolved Oxygen should be recorded as a field measurement. Analysis of Total Residual Chlorine is not necessary since the facility utilizes UV disinfection.

To set up an eDMR account, you must visit the following website. For specific instructions on setting up an eDMR account, please contact James Roberts of Ohio EPA at 614-644-2054. Please note that laboratory personnel may not submit eDMR data on behalf of the facility unless the laboratory has been designated as the facility's operator of record.

<https://ebiz.epa.ohio.gov/>

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Additionally, past or current acts of noncompliance can continue as subjects of future enforcement actions. Such enforcement actions can result in fines of up to \$10,000 per day of violation.

Please submit to Ohio EPA, within 14 days' receipt of this notification, written documentation describing the course of action that will be taken, or has been taken, to address the deficiencies identified in this letter. Your response shall include specific dates for the initiation and completion of this action plan.

Should you have any questions or comments 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

cc: Steve Kramer, R.S., Trumbull County Board of Health

