



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

September 19, 2013

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 September 19, 2013, 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. The last compliance inspection was conducted on October 22, 2013.

According to Ohio EPA files, there are two onsite wastewater systems that serve existing structures. The church rectory is a discharging residential system that is regulated by the Ashtabula County Health Department and is not regulated by this NPDES permit. 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 discharges to the north 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 approximately 20 gpd on days when the building is occupied which is approximately 2-3 days a week. The building is used for a small office (1 person).
2. The final discharge from the commercial system 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.
3. Analytical data has been submitted as required by the NPDES permit for this facility.
4. 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 October 1, 2012 through September 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

No reporting violations are noted for the time period reviewed.

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	12/11/2012	01299	Construction	Submit PTI
1/1/10	12/31/14	12/1/10	3/1/11	06/06/2013	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 construction commencement is expected by September 30, 2013. Please note that missing milestones by more than two months places this facility in **significant noncompliance**, which could subject this facility to escalated enforcement.

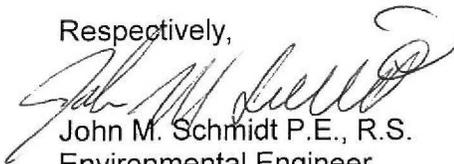
Other Violations

1. Outfall Signage: Pursuant to Part IV, Item I of your permit, you are required to post a permanent marker along the stream bank (ditch) 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,

  
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)