



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

September 19, 2013

RE: LORAIN COUNTY  
CARLISLE TOWNSHIP  
FIRST BAPTIST CHURCH  
CHRISTIAN SCHOOL  
NPDES NO. 3PR00580  
CEI

CERTIFIED MAIL

Board of First Baptist Church  
First Baptist Church of Elyria  
11400 LaGrange Road  
Elyria, OH 44035

Dear Board Members:

On August 22, 2013, this writer, and Mr. John Sabo of the Lorain County Health Department, conducted a compliance evaluation inspection (CEI) on the wastewater treatment plant (WWTP) serving the First Baptist Church and Christian School, located at 11400 LaGrange Road, Carlisle Township, Lorain County.

The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to assess compliance with the effluent limits, terms, and conditions of its recently issued National Pollutant Discharge Elimination System (NPDES) Permit. The facility was issued an NPDES permit to discharge (No. 3PR00580\*AD) on December 21, 2012, and was effective as of February 1, 2013.

At the time of the August 22<sup>nd</sup> inspection, the following observations were made of the existing sewage system:

- 1) The trash trap was in use, and its contents did have floating solids on the surface, but was not in need of pumping.
- 2) Contents of the aeration tank were watery gray in color, and were being aerated. The return sludge line was returning a clear liquid from the settling tank to the aeration tank.
- 3) Contents of the settling tank portion of the WWTP were turbid gray, and contained some floating scum and solids (see photo). **The floating solids/scum needs to be removed from the settling tank, and the sides of the settling tank scraped down.**
- 4) The skimmer in the settling tank was not operating, as it was approximately 2" above the water level. The settling tank effluent trough was dry, and did contain a growth of moss at one end. **The skimmer needs to be adjusted**



to approximately ¼ " below the water surface, and the moss removed from the settling tank effluent trough.

- 5) The aeration tank is aerated using two blower/motors. One of the blower/motors was in operation, and the remaining blower/motor was inoperable, as it was missing the drive belt, and a pulley wheel on the motor. The high air pressure relief valve was functional when tested. **The second blower/motor is to be made operational.**
- 6) Both pumps in the sand filter dosing station were set in the 'AUTO' mode, and were operational when tested manually.
- 7) The east sand filter cell was dosed when the pumps were manually tested. Both the east and the west cell of the surface sand filter was free of solids and vegetation. **The dosing pipe splash pads were not level, and should be made level for even distribution of dosed water.**
- 8) The disinfection tank contained a two tube tablet chlorination unit. One of the tube caps was missing, but the tube did contain chlorine tablets. No tablet dechlorination unit was observed.

The NPDES permit, which went effective on February 1, 2013, contains a compliance schedule for installing dechlorination facilities at the WWTP. The dechlorination facilities will enable the WWTP to meet final effluent chlorine residual limits contained within the permit.

The compliance schedule deadlines contained within the NPDES permit are as follows:

- a) **Submit detail plans not later than May 1, 2013, for the installation of a tablet dechlorination unit, which will allow the WWTP to meet final effluent chlorine residual limits.**
- b) **Commence construction of the dechlorination unit by August 1, 2013.**
- c) Complete construction of the dechlorination unit by October 1, 2013.
- d) Attain operational level and meet final effluent chlorine residual limit by November 1, 2013.

Please be advised that, **as of the date of this correspondence, the detail plan submittal for WWTP improvements is past due (May 1, 2013), as is the commencement of construction of WWTP improvements (due August 1, 2013). The completion of WWTP improvements (October 1, 2013) will soon be late, as will the ability to meet the final effluent chlorine residual limit by November 1, 2013 .**

Failure to meet NPDES permit Compliance Schedule dates is considered a violation of your NPDES permit, and is subject to Ohio EPA enforcement action. **Detail plans for the dechlorination unit must be submitted to the Ohio EPA within 30 days of the receipt of this correspondence.**

A search for the operating data for the wastewater treatment plant was conducted prior to the inspection. The electronic Discharge Monitoring Report (eDMR) data covered the period of February 1, 2013 (NPDES permit effective date) through August 21, 2013. The MOR data search revealed no eDMR reports were submitted until the June 2013 reporting period. **Please be advised that non-reporting of required parameters is also a violation of the NPDES permit, and is also subject to enforcement action by the Ohio EPA.**

A review of the eDMR data, which was submitted (June 2013 – August 2013) found the following numeric effluent limit violations:

*First Baptist Church / Christian School  
NPDES No. 3PR00580  
Numeric Effluent Limit Violations  
(2/1/13 – 9/1/13)*

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PR00580*AD	June 2013	pH	1D Conc	6.5	6.02	6/27/2013

A review of the data base for your facility lists the Certified Operator of Record (ORC) for the First Baptist Church and Christian School WWTP, as Mr. William Albrecht (Class 3 wastewater operator). Mr. Albrecht's ORC notification form was submitted to the Ohio EPA on June 13, 2013.

Please inform this office in writing, within seven days of the receipt of this correspondence, as to the status of the required dechlorination facility installation. **Failure to respond to this request for submittal of detail plans for the WWTP upgrade will result in referral to Columbus for legal enforcement action.**

Improved operation and maintenance practices need to be implemented, which will enable the First Baptist Church and Christian School WWTP to continuously meet its NPDES Permit effluent limits. **Those items outlined above in bold text need to be addressed immediately.**

Should you have any comments or questions regarding this letter, please contact this office.

Respectfully,



Charles E. Allen  
Environmental Engineer  
Division of Surface Water

CEA/cs

cc: John Sabo, Lorain County Health Department

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Board of First Baptist Church  
 First Baptist Church of Elyria  
 11400 LaGrange Road  
 Elyria, OH 44035

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