Ohio | Environmental Protection Agency

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

November 2, 2011

Bill Birmelin, Board President
Hidden Lakes Campground
5428 Twp. Road 108
Mt. Gilead, OH 43338

Re: Hidden Lakes Campground
NPDES Permit 4GS00003/ OHGS00004
Reconnaissance Inspection
Morrow County

Dear Mr. Birmelin:

On October 18, 2011, a Reconnaissance Inspection was conducted at the Hidden Lakes Campground in Morrow County. Present for the inspection were Sam Easterday representing Hidden Lakes, Wes Craft from McGhee's Technical Services and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES general permit and to evaluate the operation and maintenance of the plant.

The Reconnaissance Inspection raised several concerns which must be addressed in the following areas

Unpermitted Discharge – Pump house #1, the only remaining functional water treatment plant in the campground, has an unpermitted discharge to waters of the state. The discharge consists of iron filter backwash that utilizes chlorinated water. The operators estimated that the backwash flow is approximately 1000 gpd. Please provide a schedule for the elimination of this discharge within 30 days of the receipt of this correspondence.

Outfall Signage - In accordance with the effective NPDES permit a sign identifying the location of the outfall 001 discharge to the Kokosing River was required to be installed no later than April 30, 2010. Please have the sign installed no later than 30 days following the receipt of this correspondence and provide confirmation once installation is completed (an e-mailed photograph would be acceptable).

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

Michael E. Sapp
Compliance and Enforcement Section
Division of Surface Water
Central District Office

c: Wes Craft, McGhee's Technical Services
ec: Michael Sapp

MES/msm Hidden Lakes 11

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Watershed
4GS00003*CG	OHGS00004	RI	S	Kokosing
Inspection Date	**Entry Time**	**Exit Time**	**Notice of Violation**	**Significant Non-Compliance**
10/18/2011	9:00 AM	10:00 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Hidden Lakes Campground 5428 Twp. Rd 108 Mt. Gilead, OH 43338	3/1/2010
	Permit Expiration Date
	12/31/3014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Wes Craft, Contract Operator Sam Easterday, Maintenance Supervisor	(419) 886-4716
Name and Title of Responsible Official	Phone Number
Bill Birmelin, Board President	(419) 946-7050

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Unsatisfactory due to presence of unpermitted discharge and absence of outfall signage.
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
M	Receiving Waters	Marginal due to effluent violations
S	Laboratory	

Comments:

Signatures	
Michael E. Sapp 10/28/11	Erin Sherer 10/31/11
Michael Sapp, Inspector Date Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Date Compliance & Enforcement Supervisor Division of Surface Water Central District Office

SUMMARY OF FINDINGS AND COMMENTS

Hidden Lakes Campground
Wastewater Treatment Plant
4GS00003*CD - OHGS00004

The wastewater treatment plant serving the Hidden Lakes Campground facility has a design treatment capacity of 25,000 gpd with a direct discharge to the Kokosing River. The plant is designed to serve 1008 lots a small food service facility, shower house, and four dump stations/rest rooms. Only the food service facility and shower house are tied-into the plant directly. Wastewater generated from the individual lots and dump stations is hauled to the plant using a pumper truck. Wet stream process provided at the facility include two receiving tanks for the trucked wastewater, extended aeration with clarification, a dosing tank, tertiary sand filters, chlorination and dechlorination. Solids handling consist of a sludge holding tank with decant capabilities and a sludge drying bed.

1. At the time of the inspection, the following general observations were made with operational practices at the plant.

   - The air lines on the wastewater receiving tanks were not functional.
   - The wastewater receiving tanks at the head of the plant are not designed to feed flow to the plant at an equalized rate.
   - The campground is equipped with four comfort stations that are pumped-out on different days of the week in order to equalize loadings to the plant.
   - Each load of waste from the comfort stations is approximately 1500 gallons.
   - Aeration blowers are operated in an on/off mode of operation.
   - The influent bar screen was no longer functional.
   - 30-minute settleability tests are performed once a week to assess solids inventories.
   - Alloway Labs currently performs all lab work with the exception of dissolved oxygen and chlorine.
   - Campground staff perform plant maintenance for approximately 1 hour a day (scraping clarifier walls, checking the skimmer, cleaning sand filters and hosing the effluent weir).
   - Effluent flows are estimated using the hour meters on the tertiary dosing pumps.

- A pumper truck is used to pump sludge from the sludge holding tank to the sludge drying bed once or twice a week.

- The plant encounters freezing problems due to colder temperatures and lower flows during the winter months.

- The average daily flow rate is 1205 gpd. Peak flows over 26,000 gpd are experienced on summer holiday weekends.

2. At the time of the inspection, it was noted that one of the two aeration blowers was inoperable and the operator indicated that unit has been in a state of disrepair for 4-6 months. I would recommend that this unit be repaired or replaced so that the plant remains capable of providing adequate treatment when the existing blower fails.

3. Pump house #1, the only remaining functional water treatment plant in the campground, has an unpermitted discharge to waters of the state. The discharge consists of iron filter backwash that utilizes chlorinated water. The operators estimated that the backwash flow is approximately 1000 gpd. Please provide a schedule for the elimination of this discharge. I understand that the campground is pursuing an upgrade of the water treatment plant. Please be advised that any backwash or other wastestreams from the new facility must be directed to the wastewater treatment plant and discharged through the NPDES permitted outfall. I would recommend that you contact me regarding any new or proposed connections to the treatment plant to ensure that sufficient capacity is available. Additionally, please contact this office if the chemical constituents in the backwash wastestream are likely to change (e.g. increase in dissolved solids concentration).

1. It is recommended that consideration be given to modifying the two wastewater receiving tanks at the head of the wastewater plant. No treatment is currently being provided by these units. It may facilitate compliance with effluent ammonia limits if these tanks are modified to provide air to the incoming waste stream, as well as pumps or some other sort of controlled outlet structure to provide an equalized flow of wastewater to the plant. Providing a means to equalize influent flows would also be beneficial if wastestream from the water plant are connected to the wastewater plant.

5. A sign is required that identifies the location of the permitted outfall to the Kokosing River. The effective NPDES permit required this sign to be installed on or before April 30, 2010. Please have this sign posted within the next 30 days and submit documentation to this office once it is accomplished. The sign must comply with the following requirements:

- The marker shall consist, at a minimum, of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height.

- The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible.

6. The attached table contains a list of NPDES permit violations since the previous was conducted in September 2006. Please be advised that Part III-12 of your effective NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. Please ensure that the required explanations for any future permit violations are provided from this point forward.

Flow Data for between 1/1/2008 and 9/1/2011

	Date	Flows (GPD)
Ten Highest Flows	7/2/2011	26892
	7/3/2011	13032
	12/24/2008	11628
	3/5/2011	10368
	2/4/2008	8316
	6/4/2010	7632
	5/3/2011	7416
	3/5/2009	7344
	5/26/2011	7200
	3/3/2008	6984
Average Flow Rate		1205

NPDES Permit violations at the Hidden Lakes Campground September 2006-September 2011

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value
March 2007	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.57
August 2007	001	Fecal Coliform	30D Conc	200	1400.
August 2007	001	Fecal Coliform	7D Conc	400	1400.
March 2008	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	8.6
March 2008	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	8.6
June 2008	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.26
June 2008	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	3.26
August 2008	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.96
August 2008	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	1.96
August 2009	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.15
August 2009	001	Fecal Coliform	30D Conc	200	220.
March 2010	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	10.2
March 2010	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	10.2
December 2010	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.4