



State of Ohio Environmental Protection Agency

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1PX0006120090406

HIGHLAND BUTLER SPRINGS CHRISTIAN CAMP & RETREAT JACKSON, JOSHUA 2009/04/06
CTR

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

April 1, 2009

Butler Springs Christian Camp & Retreat Center
Attn: Mr. Keith Warner
3701 SR 41
Hillsboro, OH 45133

Notice of Violation

— CORNISA

**RE: Butler Springs WWTW/Compliance Evaluation Inspection
NPDES Permit No. OH0137561/OEPA PERMIT NO. 1PX00061*AD**

Dear Mr. Warner:

On March 25, 2009, I conducted a NPDES Compliance Evaluation Inspection at the Butler Springs Christian Camp & Retreat Center wastewater treatment works (WWTW). Terry Baker, Operator of Record and Facilities Director, was present during this inspection. The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES Permit. A copy of the report is provided within.

As noted in the report, there are deficient areas that need addressed without delay. **Please pay special attention to the "items requiring correction" shown in bold type; for there are compliance schedules associated with these items.**

Thank you for your time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

Cc: Terry Baker, Butler Springs (w/report)

Enclosures



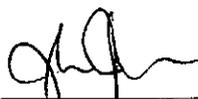
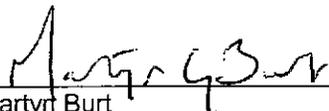


State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PX00061*AD	OH0137561	3/25/2009	C	S	2

Section B: Facility Data			
Name and Location of Facility Inspected		Entry Time	Permit Effective Date
Butler Springs Christian Camp & Retreat Center 3701 SR 41 Highland County, Brush Creek Township		9:45	9/1/2006
		Exit Time	Permit Expiration Date
		11:45	8/31/2011
Name(s), Address and Title(s) of Operator of Record			Phone Number(s)
Terry Baker, Facilities Director			937-583-2205
Name, Address and Title of Responsible Official			Phone Number
Keith Warner, Camp Director 3701 SR 41 Hillsboro, OH 45133			937-588-2205

Ohio EPA Inspector		Ohio EPA Reviewer	
	4-1-09		4/6/09
Joshua Jackson Division of Surface Water Southwest District Office	Date	Martyr Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	Date

Permit #: 1PX00061*AD
 NPDES #: OH0137561

Average Daily Design Flow:	10,000 Gallons/Day
Plant Serves:	(3) 3-bedroom homes and 210 campers
Average Daily Flow: (Period of Review):	2,200 Gallons/Day (January 2008 - February 2009)
Method of flow monitoring:	water meter
Type of alarms for plant:	influent pump and sand filter dosing pump high water alarm

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Yes**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

Trash trap will be pumped in the spring (twice yearly)

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Thin**
 Foam: **Light (white)**
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is... **Good**

Comments/Status:

**Secondary Treatment
(Settling)**

Clarity: **Solids Present**
 Condition of Weir: **Excessive Algae/Solids Build Up**
 Weir is level: **Yes**
 Effluent in weir: **Light Solids**

Permit # : 1PX00061*AD
NPDES #: OH0137561

Clarifier walls need scraped: **Yes**

Overall maintenance of settling components is: **Fair**

Comments/Status:

some bulking sludge present in the clarifiers

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Excellent**

Comments/Status:

No disinfection was taking place because it is the non-recreation season

Sludge Handling/Storage Disposal

Hauler name: AAA Sanitary (Manchester)

Disposal Site: Manchester WWTW

Sludge wasted from: Sludge holding tank

How often is sludge wasted: as needed

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Fair**

Comments/Status:

Plant Discharge

Discharge point is a: **Stream**

Name of discharge point:

Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Inspection Findings (Items for Correction shown in bold type)

The Butler Springs Christian Camp & Retreat Center wastewater treatment works (WWTW) is designed to treat and discharge an average daily flow of 10,000 gallons/day. A review of the discharge monitoring reports submitted by Butler Springs shows an average daily flow of 2,200 gallons/day (January 2008 – February 2009). Discharge flow is currently metered with the facility's water meter.

Since a water meter is used as a measurement of the discharge flow, summer discharge flow rates are not accurate because of the amount of water generated for the water slide attraction and swimming pool.

Mr. Baker stated that influent wastewater flow rates increase during precipitation events. This is caused by either inflow points in the sewage collection system and/or clear water infiltration through cracked sewer pipes and joints. The presence of inflow/infiltration within the collection system would make discharge flow rates, read from a water meter, inaccurate during and directly after rain events and snow melt.

Butler Springs' NPDES permit requires daily monitoring of discharge flows from the WWTW. As stated above, the current method of flow monitoring does not provide accurate results at different times of the year. **Butler Springs must install elapsed time meters (pump timers) on the sand filter dosing pumps or the influent pumps by no later than May 1, 2009. This device will enable more accurate discharge flow monitoring that can be read and reported daily; as required by the NPDES permit.**

EFFLUENT LIMIT VIOLATIONS
(Period of Review: January 2008 – February 2009)

7D = Weekly 30D = Monthly 1D = Daily
 Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
January 2008	Dissolved Oxygen	1D Conc	6.0	5.35
February 2008	Dissolved Oxygen	1D Conc	6.0	4.27
February 2008	Nitrogen, Ammonia (NH3)	30D Conc	3.0	6.7
February 2008	Nitrogen, Ammonia (NH3)	7D Conc	4.5	6.7
February 2008	Dissolved Oxygen	1D Conc	6.0	3.57
February 2008	Dissolved Oxygen	1D Conc	6.0	2.94
March 2008	Dissolved Oxygen	1D Conc	6.0	4.83
March 2008	Dissolved Oxygen	1D Conc	6.0	2.39
April 2008	Dissolved Oxygen	1D Conc	6.0	2.65
April 2008	Dissolved Oxygen	1D Conc	6.0	5.84
April 2008	Dissolved Oxygen	1D Conc	6.0	3.72
May 2008	Chlorine, Total Residual	1D Conc	0.019	2.2
May 2008	Chlorine, Total Residual	1D Conc	0.019	1.89

Permit # : 1PX00061*AD
 NPDES #: OH0137561

May 2008	pH	1D Conc	6.5	5.69
May 2008	Dissolved Oxygen	1D Conc	6.0	5.69
June 2008	Total Suspended Solids	30D Conc	12	21.
June 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.0	32.7
June 2008	CBOD 5 day	30D Conc	10	29.
June 2008	Chlorine, Total Residual	1D Conc	0.019	1.4
June 2008	Dissolved Oxygen	1D Conc	6.0	2.72
June 2008	Chlorine, Total Residual	1D Conc	0.019	.21
June 2008	pH	1D Conc	6.5	6.44
June 2008	Dissolved Oxygen	1D Conc	6.0	2.99
June 2008	Dissolved Oxygen	1D Conc	6.0	2.
June 2008	Total Suspended Solids	7D Conc	18	21.
June 2008	Nitrogen, Ammonia (NH3)	7D Conc	1.5	32.7
June 2008	CBOD 5 day	7D Conc	15	29.
June 2008	Chlorine, Total Residual	1D Conc	0.019	.06
June 2008	Dissolved Oxygen	1D Conc	6.0	2.42
July 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.0	7.7
July 2008	Chlorine, Total Residual	1D Conc	0.019	.24
July 2008	Chlorine, Total Residual	1D Conc	0.019	.27
July 2008	Dissolved Oxygen	1D Conc	6.0	3.3
July 2008	Nitrogen, Ammonia (NH3)	7D Conc	1.5	7.7
July 2008	Chlorine, Total Residual	1D Conc	0.019	.51
August 2008	Chlorine, Total Residual	1D Conc	0.019	.05
August 2008	Chlorine, Total Residual	1D Conc	0.019	.05
August 2008	Dissolved Oxygen	1D Conc	6.0	5.67
September 2008	Chlorine, Total Residual	1D Conc	0.019	.1
October 2008	Total Suspended Solids	30D Conc	12	17.
November 2008	pH	1D Conc	6.5	6.49

Because of the number of NPDES permit violations shown above, Ohio EPA is considering enforcement against this facility. **Butler Springs must submit a plan to Ohio EPA outlining steps that will be taken in order to bring the WWTW back into compliance. This plan must have an implementation schedule and must be submitted to this office no later than May 1, 2009.**



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