

**Environmental
Protection Agency**

Governor
Lt. Governor
Director

August 23, 2011

RE: JEFFCO LAKES CAMPGROUND
NPDES PERMIT NO. 3PR00303
WAYNE TOWNSHIP, ASHTABULA
COMPLIANCE EVALUATION INSPECTION

Mr. James A. Carkhuff, Owner
Jeffco Lakes Campground
6758 Hayes Road
Andover, OH 44003

Dear Mr. Hayes:

On August 5, 2011, a site inspection was conducted at the above referenced facility at 6758 Hayes Road, Wayne Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Richard Dixon, Maintenance Supervisor, represented Jeffco Lakes Campground during the inspection. 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 in conjunction with the renewal of said permit. The last compliance inspection was conducted on November 3, 2010.

Observations

Following are observations made during the inspection, and associated recommendations:

1. Richard A. Dixon operates the facility on behalf of Jeffco Lakes Campground. Mr. Dixon collects samples, performs laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system on behalf of Jeffco Lakes Campground. Mr. Dixon indicated that he was a former licensed operator who allowed his license to lapse with the state, and that a licensed operator currently does not oversee the facility.
2. The flow equalization chamber was found to have wood blocking diversion into the flow equalization tank. This should be removed to allow the system to function as designed. Campground sanitary wastes are typically sent to the wastewater plant in batches, which could harm the wastewater plant if the flow equalization is not utilized. Mr. Dixon noted that three motors and two pumps were replaced within the past week. The pumps and blowers were cycled and found operable. The alarm was found disconnected, this should be repaired as soon as possible.
3. The aeration blowers were cycled and found operable. The content of the aeration tank had a chocolate color, no odor, and good mixing. Sludge returns were found operating as normal.
4. The surface of the clarifier was clear with some scum present. The effluent weirs and channels need cleaning.
5. The dosing tank pumps were cycled and found in operable condition; however, the alarms were found inoperable. The alarms should be repaired as soon as possible.

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6. The sand filters were found clean and raked. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity when the dosing pumps were cycled.
7. The chlorination and dechlorination tank was found reasonably clean. The contents of the tank were clear and the tanks were found stocked with the appropriate chemicals.
8. The final outfall at the lake west of the plant was observed to have a satisfactory visual quality.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2010 through July 1, 2011, indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Effluent Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.8	5/1/2011
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	2.8	5/15/2011

These effluent limits must be explained, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting code or reporting frequency violations were reported for the time period reviewed; however, it is noted that no data appears to have been submitted for the monitoring months of March, and June 2011. For the months when the plant is not discharging due to the facility being closed, the reporting code "AL" for no flow should be provided on the first line of your report as specified by the eDMR system. As a campground is typically open from April through October, it is unclear why data is not reported when the campground is operating. A written explanation as to why these reporting events were missed must be provided, along with measures to ensure that they are not repeated.

If you need assistance in establishing an eDMR account for this facility to submit the required data electronically to Ohio EPA, please go to <http://epa.ohio.gov/dsw/edmr/eDMR.aspx>. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program.

Please provide evidence that you have submitted the missing eDMR information or provide a rationale as to why the required information has not been submitted.

Other Violations

1. Failure to Contract with a Licensed Wastewater Plant Operator – Your NPDES permit requires that your wastewater treatment works must be under the supervision of a Class I State Certified Operator. Although Richard A. Dixon operates your plant, Mr. Dixon is not currently licensed. It is recommended that Mr. Dixon contact the operator certification unit to see what is required to reinstate his license, and if he is unable to secure his license within

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30 days, Jeffco Lakes must secure the services of a licensed operator to oversee Mr. Dixon until he reinstates his license. Jeffco Lakes Campground must formally notify Ohio EPA of its designated operator of record. Necessary forms for doing this may be found on the web at <http://epa.ohio.gov/dsw/opcert/opcert.aspx>. Please submit this executed form to our central office and copy this writer. Please note that Ohio rules (Ohio Administrative Code 3745-7-04) obligate the operator of record to inspect and maintain the facility threetimes weekly for a total of 1.5 hours, as well as being available to respond to any emergencies if and when they arise.

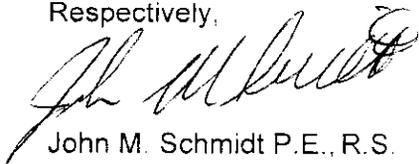
2. Failure to Accurately Report Information on the eDMR - Ohio EPA noted that the flow for this facility has been consistently reported as 190 gpd (0.00019 MGD) through the month of May. Since it is likely that there were significantly more campers at this location at the end of the month, please provide a rationale for the lack of variability in the flow data.

Frequency violations continue to occur monthly. Please be advised that failure to submit complete DMRs, failure to comply with the compliance schedule in your NPDES permit, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. Jeffco Lakes Campground remains in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office, in writing, within 30 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response 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 notification, 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:bo

File: SP/Ashtabula/Wayne Twp./Jeffco Lakes Campground (3PR00303)