

**Environmental
Protection Agency**

Mike DeWine, Governor
Liam Fisher, Lt. Governor
Chris Koneski, Director

April 30, 2010

RE: KENISEE GRAND RIVER CAMPGROUND
OHIO EPA PERMIT 3PR00391
HARPERSFIELD TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Curt Grey, Owner
Kenisee Grand River Campground
4680 State Route 307
Geneva, Ohio 44041

Dear Mr. Grey:

On April 27, 2010, a site inspection was conducted at the above referenced facility at 4680 State Route 307, Harpersfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you and Mr. John Plough represented Kenisee Grand River 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. The last compliance inspection was conducted on July 31, 2008.

The plant serves discharges from onsite buildings and 12 seasonal camp sites. Remaining camp sites utilize the on-site RV dump station, which is pumped out for off-site disposal. The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The facility discharges to a spray irrigation in the wooded area adjacent to the south side of the facility. No backup power is provided to the facility, and the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 5,000 gallons per day. The plant operates continuously, but did not have enough flow to dose the sand filters and was not discharging at the time of the inspection.
2. The content of the aeration tank had an earthy odor, light brown color with good mixing. The blower was making a noise that appears to be a bad bearing. Mr. Plough indicated that a new pump is on order and expected shortly. The blowers were running and the plant was receiving sufficient aeration. The light color is typical for a plant that is under-loaded, to be expected as your campground opens April 30. A chocolate brown color with only an earthy odor is more typical for the aeration tank.
3. The surface of the clarifier was covered with a thick layer of grease and should be clear. Effluent channels and weirs need cleaning. Mr. Plough indicated that this would be done prior to opening of the campground.

4. Slow surface and filters were reasonably clean and operable. One of the filters has a small accumulation of sludge which should be removed. No discharge to the sand filters was observed during the inspection.
5. The final discharge to the spray irrigation system was observed as dry due to lack of flow.
6. During the inspection, you noted that Dustin Lewis and Marlene Knopsnider are the designated operators of record for this facility. An examination of Ohio EPA files indicates that you notified the agency who will be the official operator of record for your WWTP.
7. Samples are collected and analyzed by Clean Streams, with data reported by the laboratory on the electronic discharge monitoring reports (eDMRs) on your behalf.

NPDES Permit Compliance Review

Kenisee Campground operates under Permit 3PR00391*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2008 through March 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	31616	Fecal Coliform	1D Conc	23	920.	7/22/2008
601	80082	CBOD 5 day	30D Conc	10	11.25	7/1/2008
601	80082	CBOD 5 day	7D Conc	15	20.	7/22/2008
601	80082	CBOD 5 day	30D Qty	0.19	.21291	7/1/2008
601	80082	CBOD 5 day	7D Qty	0.28	.3785	7/22/2008
601	31616	Fecal Coliform	1D Conc	23	150.	9/5/2008
601	31616	Fecal Coliform	1D Conc	23	320.	9/11/2008
601	31616	Fecal Coliform	1D Conc	23	168.	9/16/2008
601	31616	Fecal Coliform	1D Conc	23	740.	9/25/2008
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	6.72	8/1/2008
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	6.72	8/15/2008
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.12718	8/1/2008
601	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.028	.12718	8/15/2008
601	31616	Fecal Coliform	1D Conc	23	400.	8/5/2008
601	31616	Fecal Coliform	1D Conc	23	120.	10/5/2009
601	31616	Fecal Coliform	1D Conc	23	172.	7/21/2009
601	31616	Fecal Coliform	1D Conc	23	280.	7/28/2009
601	31616	Fecal Coliform	1D Conc	23	164.	6/3/2009
601	31616	Fecal Coliform	1D Conc	23	44.	9/3/2009

Mr. Curt Grey
 Kenisee Grand River Campground
 April 30, 2010
 Page 3

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	31616	Fecal Coliform	1D Conc	23	32	9/24/2009
601	31616	Fecal Coliform	1D Conc	23	24	8/5/2009
601	31616	Fecal Coliform	1D Conc	23	2900	8/18/2009

Please provide a written rationale of why these permit limits were exceeded, and a proposed resolution to ensure that these violations are not repeated. You indicated that this facility has problems in the past due to placing the dump station pumping into the WWTP, and the formaldehyde was interfering with the biological treatment.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

Based upon a review of Ohio EPA's files, the following is a compliance schedule summary as specified by your permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
01/01/2005	12/31/2009	04/30/2005	Unknown	---	Submit Plan	Spray irrigation System Management Plan

Part 1C of your permit requires you to submit a spray irrigation system management plan. A review of Ohio EPA files could not locate a copy of this plan. Please provide a copy of the plan as prescribed by your NPDES permit.

Other Violations

Failure to Renew your NPDES Permit: Kenisee Grand River Campground operates under Permit 3PR00391*AD, which expired on December 31, 2009. Kenisee Grand River Campground was notified in the spring of 2009 that a renewal application was due to Ohio EPA no later than June 30, 2009. To date, no application has been received. During the inspection, you indicated that the application was pending with your operator, Clean Streams.

Please be advised that Ohio's wastewater land application rules have been substantially revised since your last permit was issued. In particular, there are more stringent limits for total suspended solids (TSS), carbonaceous biochemical oxygen demand (CBOD₅), and bacteria (Fecal Coliform and E. Coli). I have attached a copy of a fact sheet for your reference, which may be found on the Web at http://www.epa.ohio.gov/portals/35/rules/42-13_factsheet_feb08.pdf. The rules governing these systems may be found on the Web at <http://www.epa.ohio.gov/portals/35/rules/42-13.pdf>. Ohio EPA recommends that you and your operator review these records to ascertain if any modifications to your existing system are required. Please note that modifications to your existing system may

Mr. Curt Grey
Kenisee Grand River Campground
April 30, 2010
Page 4

require a modification permit-to-install (PTI) application in addition to your NPDES permit renewal.

A renewal application must be completed along with associated fees, and submitted to Ohio EPA Northeast District Office as soon as possible.

Comments

Ohio EPA notes that your wastewater flow consists of the discharge from a single family home during the winter season, and this flow may be insufficient to sustain the biological treatment process within your wastewater treatment plant. Consideration should be given to importing sludge to "seed" your wastewater plant a few days prior to the commencement of your camping season to ensure that the plant is operating at peak biological performance when the plant receives the discharge from the occupied campground.

Based on the above information, Kenisee Grand River Campground is considered to be in substantial compliance operationally. However, the above items must be addressed and the NPDES permit renewal application submitted immediately or enforcement may be pursued.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed 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/mt

att: Fact Sheet: Land Application Systems, Rule 3745-42-13 of the Ohio Administrative Code, February 2008, 4 pp

File: Kenisee Campground (Harpersfield Twp) Ashtabula Co./Semipublic P/C