

**Environmental
Protection Agency**

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

May 16, 2011

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 May 12, 2011, 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 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 April 27, 2010.

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 plant is operated by Dustin Lewis and Marlene Knopsnider of Lewis Wastewater Services on behalf of Kenisee Grand River Campground.
3. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.

4. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained. The plant was re-seeded in mid-April 2011 for the start of the camping season.
5. Collected trash was containerized for disposal at a solid waste landfill. Approximately 2000 gallons of sludge and trash was removed from the facility in mid-April 2011.
6. The aerated flow equalization tank was found in acceptable condition. The blowers were cycled and found in operating condition.
7. The content of the aeration tank had a medium brown color, good mixing, and a slight earthy odor. Sludge returns were a medium brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
8. The surface of the clarifier was clear with some floating sludge. Floating sludge should be skimmed off and placed into the aerated sludge tanks. Effluent channels and weirs were reasonably clean.
9. Surface sand filter dosing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
10. Surface sand filters were reasonably clean and operable. Small amounts of accumulated dry sludge should be removed and containerized as solid waste. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
11. The chlorine contact tank was observed as reasonably clean and stocked with both chlorination and dechlorination tablets.
12. The final discharge to the spray irrigation system dosing tank was observed as dry due to lack of flow.
13. The spray irrigation system dosing tank pump was in the process of being repaired. A temporary pump was installed to provide necessary dosing of the spray irrigation system.

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14. Samples are collected by Lewis Wastewater Services who perform on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity.
15. Clean Streams Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
16. Lewis Wastewater Services submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

NPDES Permit Compliance Review

Kenisee Grand River Campground operates under NPDES Permit 3PR00391*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2010 through April 1, 2011 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	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.38	6/1/2010
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.38	6/1/2010
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.04504	6/1/2010
601	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.028	.04504	6/1/2010
601	31616	Fecal Coliform	1D Conc	23	24.	7/7/2010
601	31616	Fecal Coliform	1D Conc	23	3510.	7/20/2010
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	6.44	8/1/2010
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.12188	8/1/2010
601	31616	Fecal Coliform	1D Conc	23	56.	8/4/2010
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	6.44	8/22/2010
601	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.028	.12188	8/22/2010

Pursuant to Part III, Item 12 of your permit, you were supposed to have notified Ohio EPA as to why these permit limits were exceeded, along with measures to ensure they are not repeated. 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 during the 2010 inspection that this facility has had problems in the past due to placing the dump station pumping into the WWTP, and the formaldehyde was interfering with the biological treatment. No dump station waste should be processed through your onsite wastewater treatment system.

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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

The following additional violations of your NPDES permit are noted as follows:

1. Failure to Submit Annual Sludge Report: Ohio EPA notes that Part II, Item H of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report is required even if no sludge was removed the previous calendar year. Ohio EPA's files reflect that Kenisee Grand River Campground has never submitted this report since the NPDES permit was issued in 2005. Please submit the report to Chris Moody of this office as prescribed by your NPDES permit.

Requirement to Submit a Land Application Management Plan: Since issuance of NPDES Permit No. 3PR00341*AD, Ohio EPA has promulgated Ohio Administrative Code (OAC) Rule 3745-42-13 for land application systems. The rule became effective on July 1, 2007. As a system in operation prior to the effective date of the rule, OAC 3745-42-13(E)(2) requires that Kenisee Grand River Campground to submit a land application management plan no later than July 1, 2012, however as noted above, your compliance schedule requires this plan to have been submitted by April 30, 2005. Note that this was in addition to an NPDES permit renewal. The plan must comply with OAC 3745-42-13(E)(1), including applicable application requirements, design standards, siting restrictions, operations and maintenance requirements, and water quality/monitoring frequency requirements. The permit application components should follow the summary table outlined in OAC 3745-42-13(F) for a design flow

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of less than 10,000 gpd with a land application rate as appropriate. Based upon visual observations made during the May 12, 2011 site visit, a land application rate of less than 12 inches per acre per year are anticipated. If this land application rate is used, then the permit application requirements should follow OAC 3745-42-13(F)(1), G, H, I, J, K (Table K-3 for Q<10,000 gpd), L, M, N, and O. I have attached both a fact sheet on OAC 3745-42-13 and a copy of the actual rule for your reference. The land application management plan (LAMP) should be submitted with permit-to-install (PTI) Forms A, C2, as well as the anti-degradation addendum, as the associated fees. Forms are attached, but may be found at <http://epa.ohio.gov/dsw/pti/PTIForms.aspx>.

Although the rule requires the plan no later than July 1, 2012, Kenisee Grand River Campgrounds was required to have submitted a plan no later than April 30, 2005. This plan could be submitted in lieu of the NPDES permit renewal. If a plan is received within the next 60 days, Ohio may consider termination of the NPDES permit.

2. 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 and again in 2010 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 require a modification permit-to-install (PTI) application in addition to your NPDES permit renewal.

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

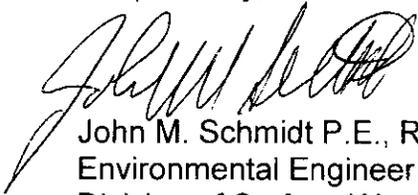
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Based on the above information, Kenisee Grand River Campground is considered to be in **substantial noncompliance** with the terms and conditions of its expired NPDE permit. The above items must be addressed and the Land Application Management Plan and 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

encl: PTI Instructions, 7pp, rev 09/09
PTI Form A, 4pp, rev 09/09
PTI Supplement to form A-C2, 7pp, rev 09/09
Antidegradation Addendum, 4pp, rev 06/97
Fact Sheet: Land Application Systems, OAC Rule 3745-42-13, February 2008,
4pp
Ohio Administrative Code (OAC) Rule 3745-42-13

cc: Dustin Lewis, Lewis Wastewater Management, w/encl

File: SP/Ashtabula/Harpersfield Twp./Kenisee Grand River Campground (3PR00391)