



**Environmental
Protection Agency**

Timothy J. Leach, Governor
Lee Fisher, Lt. Governor
Chris Corteski, Director

April 23, 2010

RE: CAMP WHITEWOOD, NE OHIO 4-H
OHIO EPA PERMIT 3PR00424
WINDSOR TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Brandon Mitchell, Executive Director
Camp Whitewood, Northeast Ohio 4-H
7983 Wiswell Road South
Windsor, Ohio 44099

Dear Mr. Mitchell:

On April 21, 2010, a site inspection was conducted at the above referenced facility at 7983 Wiswell Road South, Windsor Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you represented Camp Whitewood 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 March 13, 2007.

The system consists of a trash trap, equalization tank, extended aeration system with clarifier, lift station, dosing chamber, rapid 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 an unnamed tributary to Phelps Creek 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 8,000 gallons per day. The plant operates continuously, and was not discharging at the time of the inspection.
2. The content of the aeration tank had a slight septic odor, dark grey color with slight mixing. The blowers were running and the plant was not receiving sufficient aeration. A chocolate brown color with only an earthy odor is more typical for the aeration tank.
3. The surface of the clarifier was somewhat cloudy, and should be clear. Effluent channels and weirs need cleaning.
4. Rapid sand filters were reasonably clean and operable. One of the filters has a significant accumulation of weeds and leaves/debris, which should be removed. No discharge to the sand filters was observed during the inspection.
5. The final discharge pipe at the tributary to Phelps Creek was observed as dry due to lack of flow.

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6. During the inspection you noted that Josh Goodridge is the designated operator of record for this facility. An examination of Ohio EPA files indicates that you have not notified the agency who the official operator or record for your WWTP.
7. Samples are collected and analyzed by the Geauga County Sanitary Laboratory, with data reported by the laboratory on the electronic discharge monitoring reports (eDMRs) on your behalf.

NPDES Permit Compliance Review

Camp Whitewood operates under Permit 3PR00424*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2007 through March 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

No violations were noted for the period reviewed.

Reporting Violations

The following reporting violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Week	1	0	07/08/2009
001	01330	Odor, Severity	1/Week	1	0	07/08/2009
001	01350	Turbidity, Severity	1/Week	1	0	07/08/2009

It appears that the weekly reporting for color, odor, and turbidity were not reported for the first week of July, 2008. An explanation as to why this information was not reported must be provided.

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
08/01/2006	07/31/2011	02/01/2007	04/07/2007	04599	Construction	Complete Construction

You provided the dates that construction was completed. No response is necessary for this violation.

Other Violations

1. Failure to Designate an Operator of Record - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State

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Certified Operator as required by OAC 3745-7-02. Although you indicated that you have an operator of record, no official designation has been received by Ohio EPA. Camp Whitewood may enter into a contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation thereof provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. To-date, Ohio EPA has not received a contract with an appropriately certified operator. The operator of record designation form may be found at:

http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf

If you need to contract with a third party operator, for your reference I have attached a list of certified contract operators.

Please provide evidence that you have contracted with an appropriately certified operator to operate your WWTP and submit the Operator of Record Notification Form to Ohio EPA.

Based on the above information, Camp Whitewood is considered to be in substantial compliance with the terms and conditions of the NPDES permit. However, the above items must be addressed.

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: List of Contract Water and Wastewater Operators, revised March 19, 2010

File: Camp Whitewood (Windsor Twp) Ashtabula Co./Semipublic P/C