



Environmental
Protection Agency

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

March 4, 2011

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

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

Dear Mr. Mitchell:

On March 3, 2011, 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, and Wayne White represented the operator of record 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 21, 2010.

The system consists of a trash trap, equalization tank, extended aeration system with clarifier, lift station, dosing chamber, 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 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. During the winter months, the plant receives approximately 200 gallons per day. The plant operates intermittently with floats, and was not discharging at the time of the inspection.
2. Overall the plant was very well kept. This is a marked improvement over the previous inspection.
3. A new storage building has been added that encloses the blower. Logs are maintained at the plant site by the operator and were inspected as a part of the site visit.
4. The equalization basin pumps were cycled and found in operating condition. The alarms were found in operating condition.

Mr. Brandon Mitchell
Camp Whitewood, Northeast Ohio 4-H
March 4, 2011
Page 2

5. The content of the aeration tank had an earthy odor, medium brown color with good mixing and no foam present. The blowers were cycled and found in operating condition. The blowers were running and the plant was receiving sufficient aeration. The color and odor are typical for the aeration tank in proper condition.
6. The surface of the clarifier was somewhat cloudy, and should be clear. Effluent channels were observed in very good condition. The skimmer was found in operating condition, and the return sludge lines were observed as operating properly.
7. The sand filter dosing pumps were cycled and found in operating condition. The alarms were found in found not in operating condition. Fuses were checked at the panel and found acceptable, and it may be due to the cold temperatures. The water discharged to the sand filters during the cycling operation was observed as clear.
8. Rapid sand filters were reasonably clean and operable. There was a small amount of sludge across the filters and this should be removed as soon as weather permits. No discharge to the sand filters was observed during the inspection.
9. The final discharge pipe at the tributary to Phelps Creek observed and found dry due to lack of flow.
10. During the inspection you noted that Wayne White is the designated operator of record for this facility. Mr. White observes the plant, makes adjustments as necessary, and performs routine monitoring of the plant such as pH, D.O., temperature, color, odor, turbidity, and flow. Remaining analyses are performed by Geauga County Water resources under contract to Camp Whitewood. Ohio EPA does note that Josh Goodridge and Ron Bell from B & J environmental are still listed as operators for your facility. Ohio EPA understands that B & J Environmental are no longer your operators of record. You will need to notify Ohio EPA's operator certification unit that Josh and Ron are no longer your operators of record utilizing the operator of record form, designating these gentlemen as removed.
11. 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 April 1, 2010 through February 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Mr. Brandon Mitchell
Camp Whitewood, Northeast Ohio 4-H
March 4, 2011
Page 3

Limit Violations

No violations were noted for the period reviewed; however it should be noted that Camp Whitewood has not submitted analytical data for its facility since June 2010. Ohio EPA understands that you are working with your previous operator of record, B & J Environmental, to obtain and report the analytical data from July through December, 2010, and that your current operator assumed his duties on January 1, 2011. Ohio EPA notes that the eDMR data for January 2011 has not been filed with the eDMR system.

If no sludge was removed from the Facility in 2010, the eDMR for December 2010 should be completed noting that no sludge was removed from the facility in 2010. If the amount of sludge removed from the facility is known, then this information should be reported in the eDMR for December 2010. During our site visit we discussed if this could be completed by your current operator although he was not the operator for the reporting period. Mr. White was going to confirm with Mr. James Roberts of our central office to see if this is permissible. If this is not permissible, you will need to establish an eDMR account and submit the information as the Owner.

Please provide documentation that all data available for this facility has been submitted to Ohio EPA through the eDMR system.

Reporting Violations

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

No reporting violations were noted for the period reviewed; however it should be noted that Camp Whitewood did not submit eDMR reports or analytical data for its facility between July and December 2010. Ohio EPA understands that you are working with your previous operator of record, B & J Environmental, to obtain and report the analytical data from July through December, 2010, and that your current operator assumed his duties on January 1, 2011.

Please provide documentation that all data available for this facility has been submitted to Ohio EPA through the eDMR system.

Compliance Schedule Violations

No compliance schedule violations are noted for the time period reviewed.

Based on the above information, in particular the lack of analytical data for this facility, Camp Whitewood is considered to be in **significant noncompliance** with the terms and conditions of the NPDES permit. 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

Mr. Brandon Mitchell
Camp Whitewood, Northeast Ohio 4-H
March 4, 2011
Page 4

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

pc: Wayne White

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