



Environmental
Protection Agency

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

June 21, 2011

RE: WHISPERING HILLS RECREATION WWTP
OHIO EPA PERMIT 3PR00172
RIPLEY TOWNSHIP, HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Roger Murray, Owner
Whispering Hills Recreation, Inc.
P.O. Box 607
Shreve, OH 44676

Dear Mr. Murray:

On June 15, 2011, a site inspection was conducted at the above referenced facility at 8248 State Route 514, Ripley Township, Holmes County. The inspection was conducted by John Schmidt of this office. Mike Murray represented Whispering Hills Recreation, Inc. (WHR) 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 June 17, 2010.

Observations

The following observations were made during the inspection.

1. The plant is operated by Kevin Dean, Rick Day, Rod Shepler, Jason VanSickle, and Chad Curry of Dean's Backflow Service on behalf of Smith's Pleasant Valley Campground.
2. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. The overall condition of the treatment plant during this inspection was satisfactory with the plant well maintained.
3. The content of the aeration tank had a medium brown color and good mixing. 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.
4. The surface of the clarifier contained a significant accumulation of duckweed or some other vegetation, but was otherwise clear, with effluent channels and weirs in acceptable condition.
5. Surface sand filter dosing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
6. Surface sand filters were reasonably clean and operable. The south bed was clean and raked, and the north bed contained some vegetation that should be removed. 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.

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7. Chlorination and dechlorination systems were stocked with appropriate chemicals and operating at the time of the inspection. The tank contents were clear.
8. Samples are collected by Dean's Backflow Service, who performs on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity. Cosh Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples. Mr. Dean submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
9. The final discharge pipe at the ravine to the northwest of the plant was observed as discharging effluent of acceptable visual quality.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2010 to May 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 reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	1000	6600.	7/1/2010
001	31616	Fecal Coliform	7D Conc	2000	6600.	7/1/2010
001	31616	Fecal Coliform	30D Conc	1000	10100.	8/1/2010
001	31616	Fecal Coliform	7D Conc	2000	10100.	8/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	1.64	9/1/2010

Part III, Item 12 of your permit requires you to notify Ohio EPA of violations of your permit, including a rationale as to why these violations occurred, along with measures to ensure that they are not repeated. To-date, no notifications have been provided to Ohio EPA. These exceedances must be explained, along with measures to ensure that they are not repeated.

Reporting Violations

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

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform			AK	6/3/2010
001	31616	Fecal Coliform			AK	9/7/2010

The reporting code "AK" indicates that fecal colonies were too numerous to count.

Ohio EPA notes numerous reporting frequency violations related to color, odor, turbidity, chlorine residual, and water temperature during this review period which are not summarized individually. These violations appear to be a failure to take daily readings of these parameters

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on days that the WWTP is not visited by your contract operator. We discussed this during the inspection. Readings should be taken and results reported on the reporting forms provided by your operator, Dean's Backflow Service. Part III, Item 12 of your permit requires you to notify Ohio EPA of violations of your permit, including a rationale as to why these violations occurred, along with measures to ensure that they are not repeated. To-date, no notifications have been provided to Ohio EPA. These reporting code and reporting frequency violations should be explained, along with measures to ensure that they are not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing 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 or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

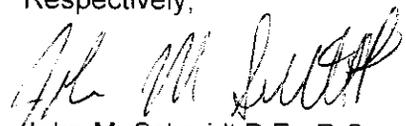
No compliance schedule violations were noted for the reporting period reviewed.

Based on the above information, Whispering Hills Recreation, Inc. is considered to be in **substantial noncompliance** with the terms and conditions of the NPDES permit, particularly in reporting required parameters at the specified frequency and for the level of bacteria violations. The above items must be addressed. Ohio EPA notes that these issues were not addressed from the inspection conducted in 2010.

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

cc: Kevin Dean, Dean's Backflow Service

File: SP/Holmes Co./Ripley Twp./Whispering Hills Recreation, Inc. (3PR00172)