



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 15, 2009

RE: MAHONING COUNTY
SEMI-PUBLIC
PONDEROSA PARK
NPDES PERMIT NO 3PS00012

Mr. Bruce Howell
Ponderosa Park Resort
9362 Salem-Warren Road
Salem, OH 44460

Dear Mr. Howell:

On November 18, 2009, this writer met with you to conduct a Compliance Evaluation Inspection (CEI) of the wastewater treatment system for the Ponderosa Park Resort campground. The intent of the inspection was to evaluate the current condition of the treatment plant and to discuss any additional items that may need to be addressed. The bottom drain for the Dunn Eden dam was also discussed relative to the October 18, 2005 Director's Final Findings and Orders (DFFOs) issued to Ponderosa Park. Also representing the Ponderosa Park Resort was Mr. Jim Beery and Mr. Lance Willard.

During the inspection it was stated that the main pump station into the treatment system was repaired with two operating pumps as originally designed. In the past the pump station was not maintained which resulted in the discharge of raw sewage through the top access into the wet well.

Following are additional discussions and observations made during this most recent inspection.

- The operational side of the wastewater treatment system was satisfactory at the time of the inspection. It appears that Ponderosa Park has attempted to complete projects that were included in the October 18, 2005 Director's Final Findings and Orders.
- The aeration tank had good color and mixing.
- It was stated that a new motor had been installed on the blower for the aeration system.
- The new media had been installed in the upflow clarifier along with new sump pumps. The flow meter has been made operational so that daily totals for flow volume can be recorded off of the flow meter.
- Both dosing pumps for the sand filters were operational.
- The effluent in the post aeration tank appeared clear and had no odor.

The northern half of the system has been re-set after floating in 2003 but remains inoperable. It was the understanding of this writer that Ponderosa Park has no intentions of making any repairs to the northern half of the system at this time. As discussed, this will reduce the capacity of the system from 80,000 gpd to 40,000 gpd. The NPDES Permit will be modified to account for the reduction in capacity.

The equalization tank for the treatment system is part of the north system. The equalization tank is on-line and receiving wastewater. The blower and the transfer pumps were not operational resulting in the accumulation of septic wastewater in the equalization tank. This septic water flows by gravity through the surface splitter box into the south system.

As discussed, the existing equalization tank must be taken off-line. Maintaining an open tank full of septic wastewater attracts vectors, such as mosquitoes in the summer, which then have the potential to spread any diseases associated with the wastewater. The tank can be taken off-line by diverting flow around the tank and directly into the south system. The wastewater in the equalization tank will then need to be slowly transferred to the south system for treatment. Soon after the tank is emptied of wastewater, it must immediately be refilled with clean water to prevent the tank from floating. The system can operate for now without flow equalization because of the low flows reported through the treatment system during the 2009 camping season (<1000 gpd). However, the system will need to be re-evaluated in the future for flow equalization.

NPDES Permit Compliance

As part of this inspection, a review of the Monthly Monitoring Reports was made to determine compliance with the NPDES Permit. The period of review was August 2008 through October 2009. Following are violations of the NPDES Permit identified for the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.0	18.6	8/1/2008
August 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.30	2.11203	8/1/2008
August 2008	Nitrogen, Ammonia (NH3)	7D Conc	1.5	37.2	8/15/2008
August 2008	Nitrogen, Ammonia (NH3)	7D Qty	0.46	4.22406	8/15/2008
August 2008	CBOD 5 day	7D Conc	15.0	21.	8/15/2008
August 2008	Dissolved Oxygen	1D Conc	6.0	3.5	8/21/2008
September 2008	Total Suspended Solids	7D Conc	18.0	31.	9/15/2008
October 2008	Dissolved Oxygen	1D Conc	6.0	4.5	10/16/2008
April 2009	Total Suspended Solids	30D Conc	12.0	16.	4/1/2009
April 2009	Total Suspended Solids	7D Conc	18.0	21.	4/15/2009
May 2009	Chlorine, Total Residual	1D Conc	0.038	.12	5/22/2009
May 2009	Chlorine, Total Residual	1D Conc	0.038	.08	5/28/2009
May 2009	Chlorine, Total Residual	1D Conc	0.038	.09	5/29/2009
June 2009	Total Suspended Solids	7D Conc	18.0	19.	6/15/2009
June 2009	Chlorine, Total Residual	1D Conc	0.038	.12	6/22/2009
June 2009	Chlorine, Total Residual	1D Conc	0.038	.12	6/24/2009
August 2009	Fecal Coliform	30D Conc	200	2000.	8/1/2009
August 2009	Fecal Coliform	7D Conc	400	2000.	8/1/2009
August 2009	Chlorine, Total Residual	1D Conc	0.038	.08	8/3/2009
August 2009	Dissolved Oxygen	1D Conc	6.0	4.7	8/6/2009
August 2009	Chlorine, Total Residual	1D Conc	0.038	.19	8/18/2009
August 2009	Chlorine, Total Residual	1D Conc	0.038	.08	8/19/2009
September 2009	Dissolved Oxygen	1D Conc	6.0	5.8	9/3/2009

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2009	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.6	10/1/2009
October 2009	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.6	10/1/2009

Be advised that violations of the NPDES Permit are subject to enforcement action including fines of up to \$10,000.00 per violation.

In addition to the limit violations identified above, the following reporting violations were identified in the Ohio EPA compliance tracking system.

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2008	Water Temperature	1/Day	1	0	08/01/2008
August 2008	Color, Severity	1/Day	1	0	08/01/2008
August 2008	Odor, Severity	1/Day	1	0	08/01/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/01/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/01/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/02/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/03/2008
August 2008	Water Temperature	1/Day	1	0	08/04/2008
August 2008	Color, Severity	1/Day	1	0	08/04/2008
August 2008	Odor, Severity	1/Day	1	0	08/04/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/04/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/04/2008
August 2008	Water Temperature	1/Day	1	0	08/05/2008
August 2008	Color, Severity	1/Day	1	0	08/05/2008
August 2008	Odor, Severity	1/Day	1	0	08/05/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/05/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/05/2008
August 2008	Water Temperature	1/Day	1	0	08/07/2008
August 2008	Color, Severity	1/Day	1	0	08/07/2008
August 2008	Odor, Severity	1/Day	1	0	08/07/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/07/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/07/2008
August 2008	Water Temperature	1/Day	1	0	08/08/2008
August 2008	Color, Severity	1/Day	1	0	08/08/2008
August 2008	Odor, Severity	1/Day	1	0	08/08/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/08/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/08/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/09/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/10/2008
August 2008	Water Temperature	1/Day	1	0	08/11/2008
August 2008	Color, Severity	1/Day	1	0	08/11/2008
August 2008	Odor, Severity	1/Day	1	0	08/11/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/11/2008

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Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2008	Chlorine, Total Residual	1/Day	1	0	08/11/2008
August 2008	Water Temperature	1/Day	1	0	08/13/2008
August 2008	Color, Severity	1/Day	1	0	08/13/2008
August 2008	Odor, Severity	1/Day	1	0	08/13/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/13/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/13/2008
August 2008	Water Temperature	1/Day	1	0	08/14/2008
August 2008	Color, Severity	1/Day	1	0	08/14/2008
August 2008	Odor, Severity	1/Day	1	0	08/14/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/14/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/14/2008
August 2008	Water Temperature	1/Day	1	0	08/15/2008
August 2008	Color, Severity	1/Day	1	0	08/15/2008
August 2008	Odor, Severity	1/Day	1	0	08/15/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/15/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/15/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/16/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/17/2008
August 2008	Water Temperature	1/Day	1	0	08/18/2008
August 2008	Color, Severity	1/Day	1	0	08/18/2008
August 2008	Odor, Severity	1/Day	1	0	08/18/2008
August 2008	Turbidity, Severity	1/Day	1	0	08/18/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/18/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/19/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/20/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/22/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/23/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/24/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/25/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/26/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/27/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/29/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/30/2008
August 2008	Chlorine, Total Residual	1/Day	1	0	08/31/2008
October 2008	Total Suspended Solids	1/Week	1	0	10/22/2008
October 2008	CBOD 5 day	1/Week	1	0	10/22/2008
October 2008	pH	1/Week	1	0	10/22/2008
October 2008	Dissolved Oxygen	1/Week	1	0	10/22/2008
July 2009	Water Temperature	1/Day	1	0	07/03/2009
July 2009	Color, Severity	1/Day	1	0	07/03/2009
July 2009	Odor, Severity	1/Day	1	0	07/03/2009
July 2009	Turbidity, Severity	1/Day	1	0	07/03/2009
July 2009	Chlorine, Total Residual	1/Day	1	0	07/03/2009

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Be advised that failure to report in accordance with the NPDES Permit is considered a violation of Ohio Revised Code 6111.07 and is subject to enforcement action. Ponderosa Park must make sure that all parameters are accounted for in accordance with the NPDES Permit reporting requirements before filing the final monthly reports.

Dunn Eden Dam

During this inspection we discussed the bottom drain for the Dunn Eden Dam. It was the understanding of this writer that the white sulfur precipitate discharging through the underdrain was observed last summer in Meander Creek. Be advised that as a result of the continued discharge, Ponderosa Park remains in Significant Noncompliance with the October 18, 2005 Director's Final Findings and Orders.

To correct this concern, it the understanding of this writer that Ponderosa Park will permanently plug the outlet from the underdrain in order to prevent the discharge of the sulfur precipitate to Meander Creek during the summer months. Please provide an update to this office by identifying actions that have been or will be taken to prevent the discharge. Please provide photographs of the underdrain outlet after completing the work.

One concern that we discussed was the possibility that leakage from the bottom of the lake could occur around the outside of the pipe. The system will be watched throughout the 2010 camping season to verify the absence or presence of any further impacts on Meander Creek.

Required Actions

As agreed during this most recent inspection, Ponderosa Park will take the following actions.

1. Since the last inspection on August 15, 2008 when Ponderosa Park identified a need to return the treatment plant to its original design, it was the understanding of this writer that Ponderosa Park plans to abandon the north system for now and maintain only the 40,000 gpd south system. Based on the average flow reported in 2009 (<1,000 gpd) following repair of the flow meter, this appears to be a reasonable action. Attempting to treat less than 1,000 gpd through an 80,000 gpd system could present operational problems and unnecessary O&M costs.
2. In order to isolate the equalization tank from the flow of wastewater, the tank will be bypassed for now, and the septic wastewater that is currently in the tank will be slowly transferred to the south system for treatment. Once the contents are emptied, the equalization tank will be filled with clean water to prevent floating.
3. A second blower and motor will be installed on the south system as a back-up to one currently available. The blower and system will be integrated with the piping from the existing blower.
4. Ponderosa Park will initiate work on the underdrain from Dunn Eden Lake. The drain must be repaired so as to stop the discharge to Meander Creek.

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Flow Calculations

Finally, we discussed a re-evaluation of the camp sites that could be permitted for the park. This re-evaluation request was based on changes at the park made during last summer.

Following are the camp site calculations from an April 28, 2003 letter. This analysis was completed following the floating of the north system, and was based on Ohio EPA Policy 0200.007.

Camper sites w/ water	220 sites	@ 50 gpd per site	11,000 gpd
Hand sink	220 sites	@ 10 gpd per site served	2,200 gpd
Showers	220 sites	@ 30 gpd per site served	6,600 gpd
Waste closets or urinals	220 sites	@ 60 gpd per site served	13,200 gpd
Restaurant	100 seats	@ 70 gpd per seat	7,000 gpd
Office	2 employees	@ 20 gpd per employee	40 gpd

Total Estimated Flow 40,040 gpd

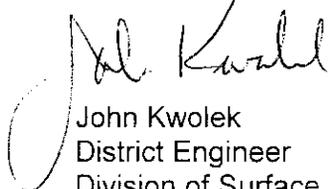
From the above analysis it can be seen that 220 sites were permitted tributary to the south system. This included campsites not tributary to the sanitary sewers; but, that have sewage storage tanks which are pumped for disposal at the treatment system.

Since 2003, Ohio Administrative Code 3745-42-05 has been modified to include a different method of calculating flow rates at campgrounds. In the event a re-evaluation of the calculations is requested by Ponderosa Park, the following information must be provided:

- 1) The number of primitive campsites without showers,
- 2) The number of primitive campsites with showers,
- 3) The number of non-primitive sites without water hook-up,
- 4) The number of non-primitive sites with water hook-up, and
- 5) The total number of seats available for food service operations at restaurants and bar and grill facilities at the park.

You may contact this writer at (330) 963-1251 to discuss any questions you may have.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc. John Hallas, Sanitarian, Mahoning County Department of Health
Joe Mansky, Mahoning County Department of Health
Mark Mann, Ohio EPA, DSW, Enforcement, CO