



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

July 24, 2009

RE: TRUMBULL COUNTY
VERNON TOWNSHIP
CAMP SUGARBUSH
6515 STATE ROUTE 88
NPDES PERMIT NO. OH0129160
OHIO EPA PERMIT NO. 3PR00257

Ms. Karen Conklin, CEO
Girl Scouts of Lake to River Council
980 Warren Avenue
Niles, OH 44446

Dear Ms. Conklin:

On June 24, 2009, an inspection was conducted of the wastewater treatment system at the above referenced facility by Mr. Richard Curl of the Trumbull County Health Department and the undersigned. The facility was represented by Mr. Scott Mascioli. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the NPDES permit.

The wet-stream treatment components consist of preliminary treatment (trash trap), 10,000 gpd extended aeration activated sludge treatment process, final settling tank, tertiary sand filtration, and chlorination/dechlorination system. The treated effluent discharges to a tributary of Mill Creek.

At the time of the inspection, the following observations, findings, and/or comments were noted:

- The overall operation and maintenance of the treatment system appeared to be satisfactory. It was noted that the facility is currently being operated on a timer.
- The final effluent being discharged to the receiving stream appeared to be of satisfactory visual quality.
- It appeared that the maintenance staff was using a roto-tiller in the sand filter for weed control. This practice is generally discouraged as it may lead to eventual "biofouling" of the sand media. As an alternative, a geotextile fabric could be placed over the sand filters to facilitate cleaning, as well as for preventative weed control.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period January 2007 through July 2009 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance are as follows:

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EFFLUENT LIMITATION VIOLATIONS

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2007	001	Total Suspended Solids	1D Qty	0.68	10162.7	6/14/2007
June 2007	001	Total Suspended Solids	30D Qty	0.45	10162.7	6/1/2007
June 2007	001	Nitrogen, Ammonia (NH3)	1D Qty	0.06	467.485	6/14/2007
June 2007	001	Nitrogen, Ammonia (NH3)	30D Qty	0.04	467.485	6/1/2007
June 2007	001	Dissolved Oxygen	1D Conc	6.0	3.7	6/14/2007
July 2007	001	Total Suspended Solids	1D Qty	0.68	5018.91	7/3/2007
July 2007	001	Total Suspended Solids	30D Qty	0.45	5018.91	7/1/2007
July 2007	001	Fecal Coliform	1D Conc	2000	4600.	7/3/2007
July 2007	001	Fecal Coliform	30D Conc	1000	4600.	7/1/2007
September 2007	001	Total Suspended Solids	1D Qty	0.68	4814.52	9/4/2007
September 2007	001	Total Suspended Solids	30D Qty	0.45	4814.52	9/1/2007
September 2007	001	Nitrogen, Ammonia (NH3)	1D Qty	0.06	112.338	9/4/2007
September 2007	001	Nitrogen, Ammonia (NH3)	30D Qty	0.04	112.338	9/1/2007

MONITORING/REPORTING VIOLATIONS

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2007	001	Dissolved Oxygen	1/Week	1	0	03/15/2007
March 2007	001	Dissolved Oxygen	1/Week	1	0	03/22/2007
April 2007	001	Color, Severity	1/Day	1	0	04/06/2007
April 2007	001	Odor, Severity	1/Day	1	0	04/06/2007
April 2007	001	Turbidity, Severity	1/Day	1	0	04/06/2007
June 2007	001	Flow Rate	1/Day	1	0	06/01/2007
June 2007	001	Flow Rate	1/Day	1	0	06/02/2007
June 2007	001	Flow Rate	1/Day	1	0	06/03/2007
June 2007	001	Color, Severity	1/Day	1	0	06/04/2007
June 2007	001	Odor, Severity	1/Day	1	0	06/04/2007
June 2007	001	Turbidity, Severity	1/Day	1	0	06/04/2007
June 2007	001	Flow Rate	1/Day	1	0	06/04/2007
June 2007	001	Flow Rate	1/Day	1	0	06/05/2007
June 2007	001	Flow Rate	1/Day	1	0	06/06/2007
June 2007	001	Flow Rate	1/Day	1	0	06/07/2007
June 2007	001	Flow Rate	1/Day	1	0	06/08/2007
June 2007	001	Flow Rate	1/Day	1	0	06/09/2007
June 2007	001	Flow Rate	1/Day	1	0	06/10/2007
June 2007	001	Flow Rate	1/Day	1	0	06/11/2007
June 2007	001	Flow Rate	1/Day	1	0	06/12/2007
June 2007	001	Flow Rate	1/Day	1	0	06/13/2007
June 2007	001	Flow Rate	1/Day	1	0	06/14/2007
June 2007	001	Flow Rate	1/Day	1	0	06/15/2007
June 2007	001	Flow Rate	1/Day	1	0	06/16/2007

-MONITORING/REPORTING VIOLATIONS

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2007	001	Flow Rate	1/Day	1	0	06/17/2007
June 2007	001	Flow Rate	1/Day	1	0	06/18/2007
June 2007	001	Flow Rate	1/Day	1	0	06/19/2007
June 2007	001	Flow Rate	1/Day	1	0	06/20/2007
June 2007	001	Flow Rate	1/Day	1	0	06/21/2007
June 2007	001	Flow Rate	1/Day	1	0	06/22/2007
June 2007	001	Flow Rate	1/Day	1	0	06/23/2007
June 2007	001	Flow Rate	1/Day	1	0	06/24/2007
June 2007	001	Flow Rate	1/Day	1	0	06/25/2007
June 2007	001	Flow Rate	1/Day	1	0	06/26/2007
June 2007	001	Flow Rate	1/Day	1	0	06/27/2007
June 2007	001	Flow Rate	1/Day	1	0	06/28/2007
June 2007	001	Flow Rate	1/Day	1	0	06/29/2007
June 2007	001	Flow Rate	1/Day	1	0	06/30/2007
July 2007	001	Flow Rate	1/Day	1	0	07/01/2007
July 2007	001	Flow Rate	1/Day	1	0	07/02/2007
July 2007	001	Flow Rate	1/Day	1	0	07/03/2007
July 2007	001	Flow Rate	1/Day	1	0	07/04/2007
July 2007	001	Flow Rate	1/Day	1	0	07/05/2007
July 2007	001	Flow Rate	1/Day	1	0	07/06/2007
July 2007	001	Flow Rate	1/Day	1	0	07/07/2007
July 2007	001	Flow Rate	1/Day	1	0	07/08/2007
July 2007	001	Flow Rate	1/Day	1	0	07/09/2007
July 2007	001	Flow Rate	1/Day	1	0	07/10/2007
July 2007	001	Flow Rate	1/Day	1	0	07/11/2007
July 2007	001	Flow Rate	1/Day	1	0	07/12/2007
July 2007	001	Flow Rate	1/Day	1	0	07/13/2007
July 2007	001	Flow Rate	1/Day	1	0	07/14/2007
July 2007	001	Flow Rate	1/Day	1	0	07/15/2007
July 2007	001	Flow Rate	1/Day	1	0	07/16/2007
July 2007	001	Flow Rate	1/Day	1	0	07/17/2007
July 2007	001	Flow Rate	1/Day	1	0	07/18/2007
July 2007	001	Flow Rate	1/Day	1	0	07/19/2007
July 2007	001	Flow Rate	1/Day	1	0	07/20/2007
July 2007	001	Flow Rate	1/Day	1	0	07/21/2007
July 2007	001	Flow Rate	1/Day	1	0	07/22/2007
July 2007	001	Flow Rate	1/Day	1	0	07/23/2007
July 2007	001	Flow Rate	1/Day	1	0	07/24/2007
July 2007	001	Flow Rate	1/Day	1	0	07/25/2007
July 2007	001	Flow Rate	1/Day	1	0	07/26/2007
July 2007	001	Flow Rate	1/Day	1	0	07/27/2007
July 2007	001	Flow Rate	1/Day	1	0	07/28/2007

MONITORING/REPORTING VIOLATIONS						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2007	001	Flow Rate	1/Day	1	0	07/29/2007
July 2007	001	Flow Rate	1/Day	1	0	07/30/2007
July 2007	001	Flow Rate	1/Day	1	0	07/31/2007
August 2007	001	Flow Rate	1/Day	1	0	08/01/2007
August 2007	001	Flow Rate	1/Day	1	0	08/02/2007
August 2007	001	Flow Rate	1/Day	1	0	08/03/2007
August 2007	001	Flow Rate	1/Day	1	0	08/04/2007
August 2007	001	Flow Rate	1/Day	1	0	08/05/2007
August 2007	001	Flow Rate	1/Day	1	0	08/06/2007
August 2007	001	Flow Rate	1/Day	1	0	08/07/2007
August 2007	001	Flow Rate	1/Day	1	0	08/08/2007
August 2007	001	Flow Rate	1/Day	1	0	08/09/2007
August 2007	001	Flow Rate	1/Day	1	0	08/10/2007
August 2007	001	Flow Rate	1/Day	1	0	08/11/2007
August 2007	001	Flow Rate	1/Day	1	0	08/12/2007
August 2007	001	Flow Rate	1/Day	1	0	08/13/2007
August 2007	001	Flow Rate	1/Day	1	0	08/14/2007
August 2007	001	Flow Rate	1/Day	1	0	08/15/2007
August 2007	001	Flow Rate	1/Day	1	0	08/16/2007
August 2007	001	Flow Rate	1/Day	1	0	08/17/2007
August 2007	001	Flow Rate	1/Day	1	0	08/18/2007
August 2007	001	Flow Rate	1/Day	1	0	08/19/2007
August 2007	001	Flow Rate	1/Day	1	0	08/20/2007
August 2007	001	Flow Rate	1/Day	1	0	08/21/2007
August 2007	001	Flow Rate	1/Day	1	0	08/22/2007
August 2007	001	Flow Rate	1/Day	1	0	08/23/2007
August 2007	001	Flow Rate	1/Day	1	0	08/24/2007
August 2007	001	Flow Rate	1/Day	1	0	08/25/2007
August 2007	001	Flow Rate	1/Day	1	0	08/26/2007
August 2007	001	Flow Rate	1/Day	1	0	08/27/2007
August 2007	001	Flow Rate	1/Day	1	0	08/28/2007
August 2007	001	Flow Rate	1/Day	1	0	08/29/2007
August 2007	001	Flow Rate	1/Day	1	0	08/30/2007
August 2007	001	Flow Rate	1/Day	1	0	08/31/2007
September 2007	001	Flow Rate	1/Day	1	0	09/01/2007
September 2007	001	Flow Rate	1/Day	1	0	09/02/2007
September 2007	001	Flow Rate	1/Day	1	0	09/03/2007
September 2007	001	Flow Rate	1/Day	1	0	09/04/2007
September 2007	001	Flow Rate	1/Day	1	0	09/05/2007
September 2007	001	Flow Rate	1/Day	1	0	09/06/2007
September 2007	001	Flow Rate	1/Day	1	0	09/07/2007
September 2007	001	Flow Rate	1/Day	1	0	09/08/2007

MONITORING/REPORTING VIOLATIONS						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2007	001	Flow Rate	1/Day	1	0	09/09/2007
September 2007	001	Flow Rate	1/Day	1	0	09/10/2007
September 2007	001	Flow Rate	1/Day	1	0	09/11/2007
September 2007	001	Flow Rate	1/Day	1	0	09/12/2007
September 2007	001	Flow Rate	1/Day	1	0	09/13/2007
September 2007	001	Flow Rate	1/Day	1	0	09/14/2007
September 2007	001	Flow Rate	1/Day	1	0	09/15/2007
September 2007	001	Flow Rate	1/Day	1	0	09/16/2007
September 2007	001	Flow Rate	1/Day	1	0	09/17/2007
September 2007	001	Flow Rate	1/Day	1	0	09/18/2007
September 2007	001	Flow Rate	1/Day	1	0	09/19/2007
September 2007	001	Flow Rate	1/Day	1	0	09/20/2007
September 2007	001	Flow Rate	1/Day	1	0	09/21/2007
September 2007	001	Flow Rate	1/Day	1	0	09/22/2007
September 2007	001	Flow Rate	1/Day	1	0	09/23/2007
September 2007	001	Flow Rate	1/Day	1	0	09/24/2007
September 2007	001	Flow Rate	1/Day	1	0	09/25/2007
September 2007	001	Flow Rate	1/Day	1	0	09/26/2007
September 2007	001	Flow Rate	1/Day	1	0	09/27/2007
September 2007	001	Flow Rate	1/Day	1	0	09/28/2007
September 2007	001	Flow Rate	1/Day	1	0	09/29/2007
September 2007	001	Flow Rate	1/Day	1	0	09/30/2007
October 2007	001	Flow Rate	1/Day	1	0	10/01/2007
October 2007	001	Flow Rate	1/Day	1	0	10/02/2007
October 2007	001	Flow Rate	1/Day	1	0	10/03/2007
October 2007	001	Flow Rate	1/Day	1	0	10/04/2007
October 2007	001	Flow Rate	1/Day	1	0	10/05/2007
October 2007	001	Flow Rate	1/Day	1	0	10/06/2007
October 2007	001	Flow Rate	1/Day	1	0	10/07/2007
October 2007	001	Flow Rate	1/Day	1	0	10/08/2007
October 2007	001	Dissolved Oxygen	1/Week	1	0	10/08/2007
October 2007	001	Flow Rate	1/Day	1	0	10/09/2007
October 2007	001	Flow Rate	1/Day	1	0	10/10/2007
October 2007	001	Flow Rate	1/Day	1	0	10/11/2007
October 2007	001	Flow Rate	1/Day	1	0	10/12/2007
October 2007	001	Flow Rate	1/Day	1	0	10/13/2007
October 2007	001	Flow Rate	1/Day	1	0	10/14/2007
October 2007	001	Flow Rate	1/Day	1	0	10/15/2007
October 2007	001	Flow Rate	1/Day	1	0	10/16/2007
October 2007	001	Flow Rate	1/Day	1	0	10/17/2007
October 2007	001	Flow Rate	1/Day	1	0	10/18/2007
October 2007	001	Flow Rate	1/Day	1	0	10/19/2007

MONITORING/REPORTING VIOLATIONS						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2007	001	Flow Rate	1/Day	1	0	10/20/2007
October 2007	001	Flow Rate	1/Day	1	0	10/21/2007
October 2007	001	Flow Rate	1/Day	1	0	10/22/2007
October 2007	001	Flow Rate	1/Day	1	0	10/23/2007
October 2007	001	Flow Rate	1/Day	1	0	10/24/2007
October 2007	001	Flow Rate	1/Day	1	0	10/25/2007
October 2007	001	Flow Rate	1/Day	1	0	10/26/2007
October 2007	001	Flow Rate	1/Day	1	0	10/27/2007
October 2007	001	Flow Rate	1/Day	1	0	10/28/2007
October 2007	001	Flow Rate	1/Day	1	0	10/29/2007
October 2007	001	Flow Rate	1/Day	1	0	10/30/2007
October 2007	001	Flow Rate	1/Day	1	0	10/31/2007
November 2007	001	Color, Severity	1/Day	1	0	11/22/2007
November 2007	001	Odor, Severity	1/Day	1	0	11/22/2007
November 2007	001	Turbidity, Severity	1/Day	1	0	11/22/2007
November 2007	001	Color, Severity	1/Day	1	0	11/23/2007
November 2007	001	Odor, Severity	1/Day	1	0	11/23/2007
November 2007	001	Turbidity, Severity	1/Day	1	0	11/23/2007
December 2007	001	Color, Severity	1/Day	1	0	12/31/2007
December 2007	001	Odor, Severity	1/Day	1	0	12/31/2007
December 2007	001	Turbidity, Severity	1/Day	1	0	12/31/2007
January 2008	001	Dissolved Oxygen	1/Week	1	0	01/08/2008
May 2008	001	Color, Severity	1/Day	1	0	05/05/2008
May 2008	001	Odor, Severity	1/Day	1	0	05/05/2008
May 2008	001	Turbidity, Severity	1/Day	1	0	05/05/2008
August 2008	001	Color, Severity	1/Day	1	0	08/01/2008
August 2008	001	Odor, Severity	1/Day	1	0	08/01/2008
August 2008	001	Turbidity, Severity	1/Day	1	0	08/01/2008
September 2008	001	Color, Severity	1/Day	1	0	09/10/2008
September 2008	001	Odor, Severity	1/Day	1	0	09/10/2008
September 2008	001	Turbidity, Severity	1/Day	1	0	09/10/2008
November 2008	001	Color, Severity	1/Day	1	0	11/28/2008
November 2008	001	Odor, Severity	1/Day	1	0	11/28/2008
November 2008	001	Turbidity, Severity	1/Day	1	0	11/28/2008

In addition to the above, our review of the facility's data reporting procedures noted the following:

- We understand that the facility currently employs Mr. Mascioli for operational oversight of the treatment system. However, our review of the facility's data reporting procedures noted that Mr. Brian Mosko, Valley Environmental Laboratories, continues to submit and certify the discharge monitoring reports

(DMRs) for the facility using the electronic DMR (e-DMR) internet application. While e-DMR allows permitted facilities to enter, sign, and submit DMRs on the internet, federal and state regulations specify who can legally sign and certify the reports. Pursuant to Part III of the NPDES permit, DMRs can only be signed and certified by a facility's responsible official, i.e. corporate officer, or by a duly authorized representative of said official. Pursuant to Title 40 Code of Federal Regulations (40 CFR) 122.22 (b):

A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***
- (3) The written authorization is submitted to the Director.***

Based on the above requirements, Mr. Mosko cannot sign and certify the DMRs.

- The person authorized to sign and submit DMRs for the facility will need to obtain an Ohio eBusiness Center account and Personal Identification Number (PIN). e-DMR is accessible via the Ohio EPA eBusiness Center. The eBusiness Center is found on the following web page:

<https://ebiz.epa.ohio.gov>

The PIN is the electronic signature of the responsible or delegated facility official. A facility can also have individuals, e.g. laboratory analyst(s), with the privilege to view, create and edit DMRS...but not submit eDMR data. These individuals must have an eBusiness Center account, but do not need a PIN. Since they do not have the privilege of actually submitting the data, the law does not require them to have a PIN (they actually aren't "signing" anything since they don't submit the data). These users are delegated access to the reports by the PIN holder. Once these users perform the data entry or review the data, the DMR is saved and the PIN holder can log on and submit the DMR.

- Ohio Administrative Code (OAC) 3745-7 requires that you have a contract with your certified operator. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the onsite services

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(i.e. **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. If applicable, the signatory authority required pursuant to 40 CFR 122.22 (b) must be addressed under the terms of the contract for submission of DMRs.

Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above referenced violations and/or deficiencies. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

cc: Scott Mascioli, Trumbull County Health Dept.

File: Semipublic/Trumbull County/Vernon Twp./Lake to River Girl Scout Council