



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

October 21, 2009

Re: Scioto County
Shawnee State Park
Compliance Inspection
Correspondence (PWW)

Mr. Scott Fletcher
Ohio Department of Natural Resources
Division of Parks and Recreation
2045 Morse Road, Building C-3
Columbus, Ohio 43229

Mr. Fletcher:

On August 11, 2009, Tim Campbell and I met with you on behalf of Ohio EPA to discuss operations at Shawnee State Park's four waste water treatment plants. At that time, we also performed inspections in order to determine compliance with NPDES Permits 0PP00029*CD (Lodge and Cabins), 0PP00035*CD (Campground), 0PP00042*CD (Golf Course and Marina), and 0GV00018*AG (Service Building) and ORC Chapter 6111. Also present were Chris Grupenhof, Tara Lee, Steve Young, and Steve Carter, representing Ohio Department of Natural Resources.

Based on observations made at that time, Ohio EPA would like to provide the following comments and recommendations regarding the four wastewater treatment plants operated by ODNR at Shawnee State Park:

Maintenance Building WWTP:

1. The maintenance building plant appeared to be adequately operated and maintained. The plant is operated under general permit.
2. As required by operator rules, all time spent at the plant must be logged. Please immediately begin keeping a log book at this plant.
3. General Permit OHV00001 will expire on December 31, 2009. This permit is for "Small Sanitary Discharges That Cannot Meet BADCT Standards." The Maintenance Building was originally covered under this permit due to a lack of dechlorination capabilities. Since this plant has been upgraded and now provides dechlorination, ODNR should apply for coverage under permit OHS000003 for "Small Sanitary Discharges" by completing a Notice of Intent (NOI). The NOI will be held in OEPA's Central Office until it is issued final early in 2010.

Lodge and Cabins WWTP:

1. Operation of the Lodge and Cabins WWTP appeared to be adequate.
2. ODNR is currently rehabilitating the equalization basin at this plant. As we discussed, equalization capabilities at this particular plant could potentially facilitate more reliable plant performance due to the fluctuating flows. It is recommended that this project be completed as soon as possible.
3. It was noted that chlorination and dechlorination tablets were lodging in the feed tubes. It is important that the operator check these tablets on a regular basis, preferably at least during every visit to the plant. Failure to maintain this chlorination and dechlorination system could result in violations of fecal coliform or residual chlorine limits.
4. At the time of our visit, one of the four sand filters had a significant amount of sludge on the surface. This sludge buildup is indicative of high flows or excessive inflow and infiltration. As mentioned above, once the equalization basin is brought back online, large fluctuations in flow rate can be better managed. It is also recommended that ODNR investigate the potential for leaks in the collection system that may be allowing storm water or groundwater to enter.
5. As soon as possible, the plant's operator should determine the MDL for total residual chlorine using methods described in 40 CFR 136, Appendix B. Please see the attached instructions.
6. It was noted during a review of records that pH calibration results are not being recorded. In order to fulfill operator duties, the plant operator must begin recording all calibration results for the pH meter.
7. The plant needs to have an hour meter installed and calibrated in order to facilitate accurate flow readings, or an alternate flow monitoring/recording device should be installed.
8. Currently, the plant's operator is running settleability tests to determine when sludge wasting is necessary. This test is not an acceptable method to determine solids inventory for the purpose of sludge wasting. Beginning immediately, the operator should begin using one of the following four methods to control the sludge wasting:
 - a. constant SRT,
 - b. constant F:M ratio,
 - c. constant MLSS, or
 - d. sludge quality.

In addition to using one of the methods at the Lodge and Cabins plant, the operator must also use one to control the waste activated sludge process at all of the other package plants owned by ODNR/Shawnee State Park. Each of these methods is discussed in the Water Environment Federation Manual of Practice, Volume II.

Campground WWTP:

1. In general, the campground WWTP appeared to be in good shape. However, the chlorination/dechlorination system was not yet operable. This system was to have been installed and functioning no later than December 1, 2001 as required by NPDES permit #0PP00035*BD, issued February 15, 2000. Please provide, in writing, details regarding chlorination/dechlorination system construction and completion dates.
2. The effluent from the campground WWTP currently flows through a short culvert with a weir. This weir is currently leaking, resulting in a low fluid level in the pipe. Based on our discussion at the time of the visit, this pipe will act as the contact chamber for dechlorination chemicals. Therefore, it is important that the leaking weir be repaired or replaced as soon as possible in order to avoid continued residual chlorine violations once the chlorination/dechlorination system is placed into service:
3. ODNR employees have identified several campground collection system inflow/infiltration sources. As we discussed during the visit, ODNR should continue to investigate the source of clean water which is entering the system, including dump stations, drinking fountain drains, and damaged sewers. These sources, once identified, must be removed from the system in order to allow for less troublesome operation of the WWTP.
4. As with the Lodge and Cabin WWTP, the Campground WWTP needs to have some type of flow monitoring/recording device installed. At a minimum, an hour meter should be installed to record the run time of the dosing pump and calibrated to facilitate accurate flow monitoring.

Marina WWTP:

1. The small Marina WWTP was in good condition. Sand filters and the disinfection unit appeared to be in good working order.
2. As was mentioned above for the Lodge and Cabin WWTP, the plant's operator should check chlorination and dechlorination tablets on a regular basis in order to prevent them from jamming in the tubes. This should be emphasized especially at the Marina plant due to the difficulty of checking and refilling the disinfection system.

3. Like the other two plants, ODNR needs to install a flow monitoring device at the Marina plant.

It has been brought to our attention that ODNR wishes to reduce plant classifications or obtain coverage under General Permit for all of the plants. In light of the improved attention to plant operation and ODNR's willingness to make necessary improvements and operational changes, we would be willing to revisit this possibility. If you are interested in pursuing plant classification changes or would like to obtain coverage under the General Permit, please provide a written request for each plant, along with reasons for this request. The request will be reviewed and a decision will be made based upon current operations and reasons provided.

In addition to plant reclassification requests, please provide documentation addressing all applicable comments noted above as soon as possible, but no later than 30 days from the date of this letter. If you have any questions or would like to further discuss Ohio EPA's findings at any of the plants, feel free to contact me. Attached are completed inspection reports for each of the four WWTPs operated by ODNR at Shawnee State Park.

Sincerely,



Michael Yandrich
District Representative
Division of Surface Water

• MY/dh

Enclosures

c: Chris Grupenhof, Park Manager
c: Tara Kinsey Lee, P.E., Natural Resources Engineer

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|-----------------|-----------------|-----------|---------------|
| 0PP00035*CD | OH0037877 | August 11, 2009 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Shawnee State Park Campground 4404 State Route 125 Portsmouth, Ohio 45662 | 10:15 a.m. | August 1, 2006 |
| | Exit Time | Permit Expiration Date |
| | 11:00 a.m. | July 31, 2011 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| Scott Fletcher, Operations, Training and Safety Section Manager | (614) 265-7055 |
| Chris Grupenhof, Park Manager | (740) 858-6652 |
| Tara Lee, Natural Resources Engineer | (614) 265-7014 |
| Steve Young, Operator | |
| Steve Carter, Operator | |
| Name, Address and Title of Responsible Official | Phone Number |
| Scott Fletcher, ODNR, Operations, Training and Safety Section Manager | (614) 265-7055 |

C. AREAS EVALUATED DURING INSPECTION

| | | |
|--------------------------------------|---------------------------------------|-------------------------------------|
| <u> </u> S Permit | <u> </u> M Flow Measurement | <u> </u> N/A Pretreatment |
| <u> </u> S Records/Reports | <u> </u> N* Laboratory | <u> </u> U Compliance Schedules |
| <u> </u> S Operations & Maintenance | <u> </u> S Effluent/Receiving Waters | <u> </u> S Self-Monitoring Program |
| <u> </u> S Facility Site Review | <u> </u> S Sludge Storage/Disposal | <u> </u> Other |
| <u> </u> M Collection System | | |

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

*Contract laboratory used.
See attached inspection letter.



Michael Yandrich, Inspector, Ohio EPA, Southeast District Office

10-20-09

Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

10/20/09

Date

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|-----------------|-----------------|-----------|---------------|
| OPP00029*CD | OH0037885 | August 11, 2009 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Shawnee State Park Lodge and Cabins 4404 State Route 125 Portsmouth, Ohio 45662 | 9:30 a.m. | June 1, 2007 |
| | Exit Time | Permit Expiration Date |
| | 10:00 a.m. | May 31, 2012 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| Scott Fletcher, Operations, Training and Safety Section Manager | (614) 265-7055 |
| Chris Grupenhof, Park Manager | (740) 858-6652 |
| Tara Lee, Natural Resources Engineer | (614) 265-7014 |
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| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|-----------------|-----------------|-----------|---------------|
| 0GV00018*AG | OH0091006 | August 11, 2009 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Shawnee State Park Service Building 4404 State Route 125 Portsmouth, Ohio 45662 | 9:00 a.m. | February 1, 2005 |
| | Exit Time | Permit Expiration Date |
| | 9:20 a.m. | December 31, 2009 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| Scott Fletcher, Operations, Training and Safety Section Manager | (614) 265-7055 |
| Chris Grupenhof, Park Manager | (740) 858-6652 |
| Tara Lee, Natural Resources Engineer | (614) 265-7014 |
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NPDES
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A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|-----------------|-----------------|-----------|---------------|
| OPP00042*CD | OH0048305 | August 11, 2009 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Shawnee State Park Golf Course and Marina 4404 State Route 125 Portsmouth, Ohio 45662 | 11:15 a.m. | April 1, 2007 |
| | Exit Time | Permit Expiration Date |
| | 12:00 p.m. | March 31, 2012 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| Scott Fletcher, Operations, Training and Safety Section Manager | (614) 265-7055 |
| Chris Grupenhof, Park Manager | (740) 858-6652 |
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