

**Environmental
Protection Agency**

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

August 8, 2011

Re: Vinton County, Harrison Twp.
Chief Logan Reservation
Compliance Inspection
NPDES 0GS00044*AG
Correspondence (PWW)

Mr. Jonathan Bonness
Simon Kenton Council
1901 E Dublin Granville Road
Columbus, Ohio 43229

Dear Mr. Bonness:

On July 20, 2011, I met with Kerry Campbell to discuss the wastewater treatment system serving the Chief Logan Boy Scout Camp. The site is located on the corner of Jackson, Ross, and Vinton Counties. The outfall and facility is in Vinton County. The purpose of the inspection was to evaluate compliance with your permit and evaluate the status of the wastewater treatment system. At the time of the inspection, the plant was in fair condition.

1. The plant smelled septic at the time of the inspection. This could be the cause of high ammonia and CBOD at the effluent. However, this system is set up to be an anaerobic system to some extent. Here are my suggestions in the order that I would try them.
 - a. Evaluate the cleaners the camp is using; any ammonia products getting into the system will cause extra ammonia problems.
 - b. The design flow is 5,000 gallons per day. If the camp is exceeding this, the equalization tanks and recirculation tanks may need to be adjusted.
 - c. Have the operator make sure the equalization tank is diverting flow at the correct rate.
 - d. Evaluate installing water saving fixtures to reduce flow.
 - e. The operator should use the flow meter data from the equalization tanks, this takes more time, but it is appearing the operator may need the more accurate data.

- f. The operator may need to contact ORENCO, the producer of the system for assistance. I will be forwarding contact information from another operator that has a similar system.
 - g. The ORENCO literature (see enclosure) suggests that the recirculation ratio should be adjusted to fit the facilities flows.
 - i. This may require using the flow meter to accurately depict daily peaks and daily flow.
 - ii. It seems that a visual inspection does not give the operator a precise measurement of the effluent (to see if any changes effect it). Parts of the plant can be sampled more frequently to troubleshoot problems. Consider buying some sampling equipment for the camp. Have the operator contact me for details.
 - h. There are two 5,000 gallon septic tanks, one 6,000 gallon equalization basis and one 15,000 gallon recirculation tank prior to the pods. There are many opportunities for the plant not to get oxygen. This could possibly be causing the effluent to be high in ammonia. The Permit to Install for the system had the aeration system to be left intact for the equalization basin. That blower system has been removed. Replacing the blower and diffusors may help.
 - i. Part of removing ammonia and nitrogen from the system demands carbon. This also may be an issue in the plant. We may want to consider removing the effluent filter in the septic tank and lowering the outlet tee to get solids into the equalization basin. This would be if we exhaust all other options.
2. The operator is keeping excellent records and logbooks.
 3. At the time of the inspection the monthly operating reports were not being submitted for flow, turbidity, severity, color, and odor. I alerted the operator that these also need to be reported on a monthly basis, not just quarterly. He is working on getting the reports submitted electronically and will start reporting monthly.
 4. The camp currently is operating under an expired National Pollution Discharge Elimination System (NPDES) general permit; I have forwarded the application for the new permit to the operator.
 5. Please note in the original Permit to Install revision letter it was mentioned that more Advantex units may have to be added and/or slow sand filters added to meet the BADCT effluent limits. If flows are continuously higher than expected this may end up being required.

6. Note that your sampling firm must also be testing for chlorine at the site. Otherwise the sample is considered invalid.
7. Please keep track of not only how much sludge is hauled and who hauls it, but also which NPDES permitted facility accepts the waste.

Please apply for your NPDES permit as soon as possible since your discharge is currently unauthorized. I will be working with the operator over the next year to bring the camp back into compliance. I will be working with your operator on a monthly basis. Please work with Mr. Campbell, your operator to come up with a rough timeline for section one to bring your plant into compliance within the next 30 days. Enclosed is a copy of my inspection report. If there are any questions, please call me at (740) 380-5266.

Sincerely,



Cynthia Yandrich
District Representative
Division of Surface Water

CY/dh

Enclosure

c: Kerry Campbell (w/enclosure)

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|---------------|-----------------|-----------|---------------|
| OGS00044*AG | OHS000002 | July 20, 2011 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Chief Logan Scout Reservation Simon Kenton Council Harrison Township, Vinton County, Ohio | 9:35 a.m. | April 15, 2009 |
| | Exit Time | Permit Expiration Date |
| | 10:45 a.m. | December 31, 2010 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| Kerry Campbell, Operator | |
| Name, Address and Title of Responsible Official | Phone Number |
| Mr. Jonathan Bonness Boy Scouts of America, Simon Kenton Council 1901 East Dublin-Grandville Road Columbus, Ohio 43229 | 614-436-7200 |

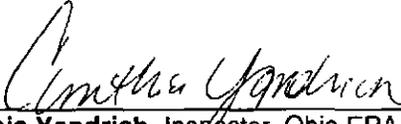
C. AREAS EVALUATED DURING INSPECTION

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

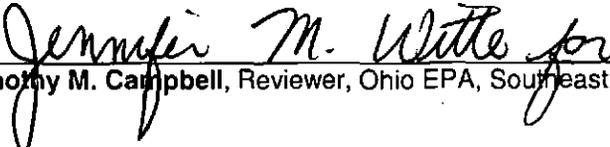
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached letter.


Cynthia Yandrich, Inspector, Ohio EPA, Southeast District Office

8-5-11
Date


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

8/5/11
Date