



**Environmental
Protection Agency**

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

April 20, 2012

Re: Athens County
Ketchum Campground
Compliance Evaluation Inspection
NPDES Permit 0PR00592*CD
Correspondence (PWW)

Mr. Roger Ketchum
Ketchum Campground
P.O. Box 45739
Hockingport, Ohio 45739

Dear Mr. Ketchum:

On March 22, 2012, Jennifer Witte and I conducted a Compliance Evaluation Inspection at the Ketchum Campground sewage treatment plant (STP) in Hockingport. You, Ray Fassett and Jeff Wilson, STP maintenance personnel, accompanied me on the plant inspection. The purpose of the inspection was to determine the status of compliance with the terms and conditions of the NPDES permit 0PR00592*CD. The inspection form is attached.

I have the following comments as a result of the inspection:

1. **2010 Director's Final Findings and Orders – Schedule of Compliance:** The 2010 Director's Final Findings and Orders issued to Roger Ketchum, dba Ketchum Campground, contained a compliance schedule requiring the installation of a flow equalization system by May 1, 2010. To date, you have not complied with the compliance schedule. This must be accomplished by May 1, 2012. Prior to installation, you must resubmit the PTI application and obtain approval since the PTI for the equalization system expired July 6, 2011.

Escalated enforcement action may result if this deadline of May 1, 2012 is not met. Notify Ohio EPA when installation of the equalization tank is accomplished.

2. **NPDES Permit Part II, Item E. - Plant Operation and Maintenance:** The permittee is required to maintain in good working order and operate as efficiently as possible the "treatment works" and "sewerage system" as defined in ORC 6111.01 to achieve compliance with the terms and conditions of this permit and to prevent discharges to the waters of the state, surface of the ground, etc.

- a. At the time of the inspection the campground and sewage treatment plant had been closed for the winter. Prior to the campground being opened for the season the trash trap needs to be pumped, the sand beds need to be cleaned and raked, and any other scheduled maintenance must be performed.
 - b. Also, it appears that stormwater is entering the sewer system. The operator should examine the connection points where the campers are tied into the sewer system. Often, the act of connecting and disconnecting to the sewer over time will break the elbow buried in the ground, and the cracks will allow rain and groundwater to enter the sanitary sewers. This extra flow will cause operational problems and increase the cost of running the plant due to treating "clean" rainwater.
3. **Ohio Administrative Code Chapter 3745-7-04 – Operator of Record Requirements:** All treatment works, sewerage systems, or wastewater treatment facilities within a treatment works shall be classified as a class A, I, II, III, or IV treatment works or class I or II sewerage systems and shall provide the minimum staffing required for that classification of wastewater treatment facility. Industrial wastewater treatment plants shall be classified in accordance with paragraph 3745-7-4(B)(3)(c).

An Operator of Record form was submitted to Ohio EPA on 12/22/2011.

Please be aware that if the aforementioned milestone for the flow equalization basin is not met, it will be necessary for Ohio EPA to initiate additional legal action. Please respond, in writing, to issues 1 and 2 above no later than April 30, 2012. If you have any questions, please contact me at your convenience at (740) 380-5284.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Compliance Unit
Division of Surface Water

AS/dh

Enclosure

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPR00592*CD	OH0107875	March 22, 2012	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Ketchum Campground Rock Run Road and Hocking Terrace Road Hockingport, Ohio	10:30 a.m.	November 1, 2011
	Exit Time	Permit Expiration Date
	11:00 a.m.	October 31, 2016

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Roger Ketchum, Owner Ray Fassett and Jeff Wilson, WWTP Maintenance	(740) 667-3630
Name, Address, & Title of Responsible Official	Phone Number
Roger Ketchum, Owner P.O. Box 551 Hockingport, Ohio 43739	(740) 667-3630

C. AREAS EVALUATED DURING INSPECTION

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

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

See attached letter.



Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

4/20/12

 Date



Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office

4/20/12

 Date