



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

May 21, 2012

RE: KENISEE GRAND RIVER CAMPGROUND
OHIO EPA PERMIT 3PR00391
HARPERSFIELD TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Ms. Gladys Grey, Owner
Kenisee Grand River Campground
4680 State Route 307
Geneva, Ohio 44041

Dear Ms. Grey:

On May 21, 2012, a site inspection was conducted at the above referenced facility at 4680 State Route 307, Harpersfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. You and John Blough represented Kenisee Grand River Campground (KGRC), and Steve Howe represented Ake Environmental, your operator, during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on May 12, 2011.

The plant serves discharges from onsite buildings and 12 seasonal camp sites. The 288 remaining camp sites utilize the on-site RV dump station, and shower houses with holding tanks, which are pumped out for off-site disposal. The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publicly owned treatment works (POTW). The facility discharges to a spray irrigation in the wooded area adjacent to the south side of the facility. No backup power is provided to the facility, and the facility is provided with alarms.

Observations

The following observations were made during the inspection:

1. The design flow of the extended aeration plant is 5,000 gallons per day. The plant operates continuously. A problem developed with a breach in the wall between the clarifier and then aeration tank, and the aeration tank was nearly empty. The plant was not discharging at the time of the inspection.
2. The plant was operated by Dustin Lewis and Marlene Knopsnider of Lewis Wastewater Services on behalf of KGRC through June 24, 2011. The plant had no operator of record from June 24, 2011 through July 4, 2011. Steve Howe, Jeffery Gin, and Charles Newman of Ake Environmental notified Ohio EPA that they became the operators of record as of July 5, 2011. Discussions with Mr. Howe indicated that one of his operators has left the company and has been replaced, and a new Operator of Record Certification (ORC) form will be provided adding the new operator and removing the operator who left the company.

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3. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. A review of the log book indicates that this plant is only inspected by a licensed operator once a week. Mr. Howe indicated that your contract only allows one site visit weekly.
4. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained.
5. Collected trash was containerized for disposal at a solid waste landfill. Approximately 2000 gallons of sludge and trash was removed from the facility in mid-April 2011.
6. The aerated flow equalization tank was found in acceptable condition. The blowers were cycled and found in operating condition.
7. The content of the aeration tank had a medium brown color, good mixing, and a slight earthy odor. Sludge returns were a medium brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
8. As noted above, the clarifier was nearly empty. The skimmer was not functioning due to the low water levels. Effluent channels and weirs were reasonably clean.
9. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
10. Surface sand filters were reasonably clean and operable. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
11. The chlorine contact tank was observed as reasonably clean and stocked with both chlorination and dechlorination tablets.
12. The final discharge to the spray irrigation system dosing tank was observed as dry due to lack of flow.
13. The spray irrigation system was found in operable condition.
14. Samples are collected by Lewis Wastewater Services prior to June 24, 2011 and Ake Environmental since July 5, 2011. The contract operator performs on-site analysis of pH and DO. Prior to December 1, 2011, the contract operator also performed observations of flow, color, odor, and turbidity.
15. Clean Streams Laboratories provided the sample bottles and preservatives and performed laboratory analysis of collected samples prior to June 24, 2011; and Ake Environmental assumed these duties as of July 5, 2012.
16. Lewis Wastewater Services submitted the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system prior to June 24, 2011; and Ake Environmental assumed these duties as of July 5, 2012.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2011 through April 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	31616	Fecal Coliform	1D Conc	23	76.	5/4/2011
601	50060	Chlorine, Total Residual	1 D Conc	0.01 min	<0.01	5/4/2011
601	50060	Chlorine, Total Residual	1 D Conc	0.01 min	<0.01	5/10/2011
601	50060	Chlorine, Total Residual	1 D Conc	0.01 min	<0.01	5/24/2011
601	31616	Fecal Coliform	1D Conc	23	288.	5/24/2011
601	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	10.22	6/1/2011
601	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	10.22	6/1/2011
601	00610	Nitrogen, Ammonia (NH3	30D Qty	0.019	.19341	6/1/2011
601	00610	Nitrogen, Ammonia (NH3	7D Qty	0.028	.19341	6/1/2011
601	50060	Chlorine, Total Residual	1 D Conc	0.01 min	<0.01	6/7/2011
601	50060	Chlorine, Total Residual	1 D Conc	0.01 min	<0.01	6/14/2011
601	31616	Fecal Coliform	1D Conc	23	5800.	6/23/2011
601	50060	Chlorine, Total Residual	1 D Conc	0.01 min	<0.01	6/23/2011
601	31616	Fecal Coliform	1D Conc	23	2450.	7/11/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	7/11/2011
601	31616	Fecal Coliform	1D Conc	23	200.	7/18/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	7/18/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	7/25/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	8/1/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	8/8/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	8/15/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	8/22/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	8/29/2011
601	31616	Fecal Coliform	1D Conc	23	620.	9/6/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.01	9/6/2011
601	31616	Fecal Coliform	1D Conc	23	250.	9/12/2011
601	31616	Fecal Coliform	1D Conc	23	2460.	9/19/2011
601	50060	Chlorine, Total Residual	1D Conc	1.0 min	0.53	9/19/2011

The numerous chlorine residual violations (not maintaining a minimum chlorine residual of 1.0 mg/l) has likely attributed to the high bacteria levels. The above violations placed KGRC in significant noncompliance (SNC) for bacteria, and Ohio EPA notified KGRC and its operator of these violations on October 19, 2011. Ohio EPA received a response from your current operator, Ake Environmental, on October 27, 2011 stating that your operator was in error as to the bacteria limit that was supposed to be achieved.

Pursuant to Part III, Item 12 of your permit, KGRC and/or its operator were supposed to have notified Ohio EPA as to why these permit limits were exceeded, along with measures to ensure they are not repeated.

Reporting Violations

The following reporting violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	31616	Fecal Coliform			AK	6/20/2011
601	31616	Fecal Coliform			AK	6/14/2011

The "AK" code is used when biological samples are too numerous to count. As noted above, these violations coincide with chlorine residual violations, suggesting that not maintaining a minimum chlorine residual of 1.0 mg/l has likely attributed to the high bacteria levels. The above violations placed KGRC in significant noncompliance (SNC) for bacteria, and Ohio EPA notified KGRC and its operator of these violations on October 19, 2011. Ohio EPA did receive a response from your current operator, Ake Environmental, on October 27, 2011 stating that these violations were under the watch of your previous operator, and that they could provide no rationale.

Pursuant to Part III, Item 12 of your permit, KGRC and/or its operator were supposed to have notified Ohio EPA as to why these permit limits were exceeded, along with measures to ensure they are not repeated.

Compliance Schedule Violations

Based upon a review of Ohio EPA's files, the following is a compliance schedule summary as specified by your permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
12/01/2011	11/30/2016	12/01/2012	Not Complete	95999	Report	E Coli Evaluation
12/01/2011	11/30/2016	01/01/2013	Not Complete	—	Construction	Submit PTI if Needed
12/01/2011	11/30/2016	06/01/2013	Not Complete	05699	Construction	Achieve Final Limits E Coli
12/01/2011	11/30/2016	07/01/2012	Not Complete	01299	Construction	Submit LAMP

Please note that Part 1C of your permit requires you to submit a spray irrigation system management plan no later than July 1, 2012. Although Ake Environmental has advised Ohio EPA of KGRC's intention to submit a permit-to-install (PTI) for an onsite system (mound system) to replace the discharge, no PTI application has been received to-date. Please be advised that it can take up to 180 days to process a PTI application, let alone construct it and then eliminate the PTI discharge. If Ohio EPA does not receive a land application management plan by the date as prescribed by your permit, KGRC will be in violation of its NPDES permit. Remaining milestones have not yet been reached; therefore, there is no comment on remaining milestones.

Other Violations

The following additional violation of your NPDES permit is noted as follows:

1. Failure to Submit an Accurate Annual Sludge Report: Ohio EPA notes that Part II, Item H of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. Although reports have been submitted, they indicate that no sludge has been removed from the facility over the previous calendar year. As previous inspections have noted that sludge has been removed from this facility, please submit an accurate report to Chris Moody of this office as prescribed by your NPDES permit.

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2. Minimum Staffing Requirements: Based the information provided in the log documenting visits by your ORC, KGRC is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, the facility must be staffed by a licensed operator twice weekly for a total of an hour.
3. Failure to Maintain a Copy of NPDES Permit and Contract at WWTP: The inspection revealed that records required pursuant to OAC 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. The records must be accessible onsite for twenty-four hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A)(2). The facility Owner and Operator are both responsible to make sure that the NPDES permit and contract, in addition to the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. Failure to have a copy of the NPDES permit onsite has led to effluent violations as noted above (failure to maintain minimum chlorine residuals). In addition to the log book, a copy of the contract with your ORC and the current NPDES permit must be maintained at the site.
4. Failure to Notify of a Change in Ownership or Control: Ohio EPA notes that this permit is issued to Curt Grey, dba Kenisee Grand River Campground. According to the Ashtabula County Auditor's Office, you acquired the property from Kenisee's Grand River Campground on January 5, 2010. Pursuant to Part III, Item 19 of your NPDES permit, the Permittee must notify the succeeding owner or successor of the existence of this permit and a copy forwarded to this office. Ohio EPA has no record of receiving this notification from the former facility owners. Your permit also states that Ohio EPA must be notified of the date of transfer to enable to establish ownership of violation(s). Please provide Ohio EPA the date of ownership and permit transfer on the appropriate transfer of NPDES permit form, found at http://epa.ohio.gov/portals/35/permits/NPDESTransferForm_fis.pdf. Upon date of the notification, Ohio EPA will commence the process to modify this permit to reflect the change on ownership of this permit.

Comments

1. Requirement to Submit a Land Application Management Plan: As you are aware, Ohio EPA has promulgated Ohio Administrative Code (OAC) Rule 3745-42-13 for land application systems. The rule became effective on July 1, 2007. As a system in operation prior to the effective date of the rule, OAC 3745-42-13(E)(2) requires that Kenisee Grand River Campground to submit a land application management plan no later than July 1, 2012. The plan must comply with OAC 3745-42-13(E)(1), including applicable application requirements, design standards, siting restrictions, operations and maintenance requirements, and water quality/monitoring frequency requirements. The permit application components should follow the summary table outlined in OAC 3745-42-13(F) for a design flow of less than 10,000 gpd with a land application rate as appropriate. Based upon visual observations made during the May 12, 2011 and May 14, 2012 site visits; a land application rate of less than 12 inches per acre per year is anticipated. If this land application rate is used, then the permit application requirements should follow OAC 3745-42-13(F)(1), G, H, I, J, K (Table K-3 for Q<10,000 gpd), L, M, N, and O. I have attached both a fact sheet on OAC 3745-42-13 and a copy of the actual rule for your reference. The land application management plan (LAMP) should be submitted with PTI Forms A, C2, as well as the anti-degradation addendum, as the associated fees. Forms may be found at <http://epa.ohio.gov/dsw/pti/PTIForms.aspx>.

Please be advised that Ohio's wastewater land application rules have been substantially revised since your last permit was issued. In particular, there are more stringent limits for total suspended solids (TSS), carbonaceous biochemical oxygen demand (CBOD₅), and bacteria (Fecal Coliform and E. Coli). A fact sheet for your reference may be found on the web at http://www.epa.ohio.gov/portals/35/rules/42-13_factsheet_feb08.pdf. The rules governing these systems may be found on the web at <http://www.epa.ohio.gov/portals/35/rules/42-13.pdf>. Ohio EPA recommends that you and your operator review these records to ascertain if any modifications to your existing system are required. Please note that modifications to your existing system may require a modification PTI application.

2. Consideration for Additional full-Service Campsites: During the course of the inspection, you indicated that you may want to pursue converting some of the existing primitive campsites to full hookup sites which would require the installation of additional sewers. Sanitary sewer installation requires a PTI application to be prepared by an Ohio Professional Engineer and submitted to this office for review. As indicated during the inspection, your current waste water treatment plant is designed for an average daily flow of 5,000 gpd. Currently, there is only the 12 full hookup sites (12 @ 90 gpd/site = 1,080 gpd) and a one-bedroom apartment (1 bedroom @ 120gpd/bedroom), for a total of 1,200 gpd. Additional flow to the plant could be considered by Ohio EPA, but for any sanitary sewer extension, KGRC must obtain a PTI.

Based on the above information, Kenisee Grand River Campground remains in **substantial noncompliance** with the terms and conditions of your NPDES permit. The above items must be addressed and the Land Application Management Plan or PTI for the onsite system submitted immediately or enforcement may be pursued.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

Cc: Steven Howe, Ake Environmental

File: SP/Ashtabula/Harpersfield Twp./Kenisee Grand River Campground (3PR00391)