



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 6, 2012

RE: JEFFCO LAKES CAMPGROUND
NPDES PERMIT NO. 3PR00303
WAYNE TOWNSHIP, ASHTABULA
COMPLIANCE EVALUATION INSPECTION

Mr. James A. Carkhuff, Owner
Jeffco Lakes Campground
6758 Hayes Road
Andover, OH 44003

Dear Mr. Hayes:

On July 5, 2012, a site inspection was conducted at the above referenced facility located at 6758 Hayes Road, Wayne Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Richard Dixon, Maintenance Supervisor, represented Jeffco Lakes Campground 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 in conjunction with the renewal of said permit. The last compliance inspection was conducted on August 5, 2011.

Observations

Following are observations made during the inspection, and associated recommendations:

1. Richard A. Dixon operates the facility on behalf of Jeffco Lakes Campground. Mr. Dixon collects samples, performs laboratory analyses, and electronically submits the data to the electronic Discharge Monitoring Report (eDMR) system on behalf of Jeffco Lakes Campground. Mr. Dixon indicated that he was a former licensed operator who allowed his license to lapse with the state, and that a licensed operator currently does not oversee the facility.
2. Log books, a copy of the NPDES permit, contract with a licensed operator of record, and the operation and maintenance manual are not maintained at the site. Loose sheets were maintained in a 3-ring notebook by Mr. Dixon. The onsite records do not comply with the requirements of Ohio Administrative Code (OAC) rule 3745-7-09, and minimum staffing requirements per OAC 3745-7-04 cannot be demonstrated.
3. The flow equalization pumps and blowers were cycled and found operable. The alarm was found disconnected; this should be repaired as soon as possible.
4. The aeration blowers were cycled and found operable. The content of the aeration tank had a chocolate color, no odor, and good mixing. Sludge returns were found operating as normal.

5. The surface of the clarifier was clear with some scum present. The effluent weirs and channels were reasonably clean.
6. The dosing tank pumps and alarms were cycled and found in operable condition.
7. The east filter was found with sludge and weeds, and was slowly draining. The filter must be taken out of service and cleaned. The west filter has some accumulation of weeds, and must be cleaned before being placed into service. The effluent discharged to the east sand filter during the inspection was clear and free of color and turbidity when the dosing pumps were cycled.
8. The chlorination and dechlorination tank was found flooded, with both the tablet chlorinator and tablet dechlorinator found submerged. We were unable to determine if the units are stocked with the appropriate chemicals.
9. One pump was found plugged or otherwise malfunctioning that pumps the disinfection tank effluent up to the final outfall. Mr. Dixon stated that he had an additional pump onsite and would replace the malfunctioning pump today.
10. The final outfall at the lake west of the plant was observed to have a satisfactory visual quality.
11. Sludge was last removed from the system in October 2010. Sludge should be removed from this facility annually.

NPDES Permit Compliance Review

A review of the eDMRs received by Ohio EPA for the period July 1, 2011 through June 1, 2012 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Missing eDMR Data

A review of the data submitted for this facility indicates that data submissions are missing for April 2012 and May 2012. Per your NPDES permit, data must be submitted by the 20th of the month for the previous month. Please provide a rationale as to why the data was not collected, along with measures to ensure that it is not repeated. Part III, Item 12 of your permit requires you to notify Ohio EPA of noncompliance. A written explanation as to why these reporting events were missed must be provided, along with measures to ensure that they are not repeated.

Effluent Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	30D Qty	0.49	5147.6	8/1/2011
001	80082	CBOD 5 day	7D Qty	0.74	5147.6	8/15/2011

A review of the data reported to Ohio EPA indicates that the flow rate is reported for August 2011 as 340 MGD (340,000,000 gallons per day). Please revise the data submission or amend the eDMR submission to indicate the accurate flow rate for the facility. In examining the flow rates for September and October 2011 indicate that the flow is estimated as below detectable levels. These must also be revised with an estimate of the actual flow. No data was submitted to Ohio EPA for the month of November 2011. Flow rate must be estimated daily and not use the same flow for the entire month unless the actual flow remains unchanged during the entire month, which is highly unlikely. Please revise and resubmit the required data.

Reporting Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Month	1	0	08/01/2011
001	00610	Nitrogen, Ammonia (NH3)	1/Month	1	0	08/01/2011
001	50060	Chlorine, Total Residual	1/2Weeks	1	0	08/01/2011
001	50060	Chlorine, Total Residual	1/2Weeks	1	0	08/15/2011
001	00400	pH	1/Month	1	0	08/01/2011
001	00300	Dissolved Oxygen	1/Week	1	0	08/01/2011
001	00300	Dissolved Oxygen	1/Week	1	0	08/08/2011
001	00300	Dissolved Oxygen	1/Week	1	0	08/15/2011
001	00300	Dissolved Oxygen	1/Week	1	0	08/22/2011

The above indicates that data was expected but not submitted. If the data was collected please submit the data, if not, please provide a rationale as to why the data was not collected, along with measures to ensure that it is not repeated. Part III, Item 12 of your permit requires you to notify Ohio EPA of noncompliance. As a campground is typically open from April through October, it is unclear why data is not reported when the campground is operating. A written explanation as to why these reporting events were missed must be provided, along with measures to ensure that they are not repeated.

If you need assistance in establishing an eDMR account for this facility to submit the required data electronically to Ohio EPA, please go to <http://epa.ohio.gov/dsw/edmr/eDMR.aspx>. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program.

Please provide evidence that you have submitted the missing eDMR information or provide a rationale as to why the required information has not been submitted.

Compliance Schedule Violations

Your current NPDES permit does not contain a compliance schedule.

Other Violations

1. Failure to Contract with a Licensed Wastewater Plant Operator – Your NPDES permit requires that your wastewater treatment works must be under the supervision of a Class I State Certified Operator. Although Richard A. Dixon operates your plant, Mr. Dixon is not currently licensed. It is recommended that Mr. Dixon contact the operator certification unit to see what is required to reinstate his license, and if he is unable to secure his license within 30 days, Jeffco Lakes must secure the services of a licensed operator to oversee Mr. Dixon until he reinstates his license. Jeffco Lakes Campground must formally notify Ohio EPA of its designated operator of record. Necessary forms for doing this may be found on the web at <http://epa.ohio.gov/dsw/opcert/opcert.aspx>. Please submit this executed form to our central office and copy this writer. Please note that Ohio rules (Ohio Administrative Code 3745-7-04) obligate the operator of record to inspect and maintain the facility three times weekly for a total of 1.5 hours, as well as being available to respond to any emergencies if and when they arise.
2. Failure to Accurately Report Information on the eDMR - Ohio EPA noted that the flow for this facility has been consistently reported as a single flow rate for each month. Since it is likely that there were significantly more campers at this location on weekends as opposed to

weekdays, please provide a rationale for the lack of variability in the flow data. Flows should be estimated daily.

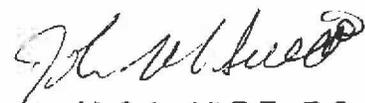
3. Failure to Maintain a Copy of NPDES Permit and Contract at WWTP: The inspection revealed that records required pursuant to OAC 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. The records must be accessible onsite for twenty-four hour 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.

Please be advised that failure to contract with a licensed operator, failure to submit an operator of record documentation, failure to submit eDMRs and complete eDMRs, and failure to adequately operate and maintain your wastewater treatment plant is cause for an enforcement action pursuant to chapter 6111 of the Ohio Revised Code. Jeffco Lakes Campground remains in significant noncompliance with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please inform this office, in writing, within 30 days from the date of this letter as to the actions that have been or will be taken to correct the above violations. Your response 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 notification, 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

File: SP/Ashtabula/Wayne Twp./Jeffco Lakes Campground (3PR00303)