



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 16, 2012

RE: WILLOW LAKE CAMPGROUND  
OHIO EPA PERMIT 3PR00548  
GENEVA TOWNSHIP, ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Pat and Dick Rowley, Owners  
Willow Lake Campground  
P.O. Box 460  
3935 State Route 534 North  
Geneva, OH 44041

Dear Pat and Dick Rowley:

On July 12, 2012, a site inspection was conducted at the above referenced facility at 3935 North Broadway, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Dick Rowley and Steve Klaue represented Sombrero Properties, LLC, owner, 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. This is the first compliance inspection for this facility.

A permit-to-install (PTI) and NPDES permit has been issued for this facility, but it has not yet been constructed. Mr. Rowley indicated that Mack Industries has advised of a 2-month backlog and the order for the tanks has been sent into Mack just a few weeks ago. The current operation consists of a dump station that is pumped and taken offsite for disposal at a licensed wastewater treatment plant. The new system is proposed to consist of a new dump station with a 1,000-gallon trash trap, 3,866 LF of 8-inch gravity sewer, 2,000-gallon trash trap, lift station, 5,000-gallon flow equalization tank, 5,000-gallon septic tank, 5,000-gallon splitter tank, two sets of 5,000-gallon dosing tanks and 1,083 SF recirculating sand filters in parallel, an ultraviolet disinfection system, and discharge to an unnamed tributary to Cowles Creek. The system will serve an existing campground with a 150 units with a bathhouse and dump station located at 3935 State Route 534, Geneva Township, Ashtabula County. The system will be located north of the current campground. No backup power will be provided to the facility that will be outfitted with alarms.

The current dump station will be abandoned once the new system is constructed.

**Observations and Notations**

The following observations were made during the inspection:

1. Sombrero Properties, LLC has not established an account for Ohio EPA's electronic discharge monitoring report (eDMR) system. This must be established as soon as possible. Information of the eDMR system may be found through Ohio EPA's website at <http://www.epa.ohio.gov/Default.aspx?tabid=3425>. Reports must be submitted even if the plant has not been constructed or data generated yet.
2. Monthly data of water usage and daily records of trailer occupancy have been maintained by Sombrero Properties, LLC since May 1, 2012. Water usage records must be maintained on a daily basis.

### **NPDES Permit Compliance Review**

A review of the eDMRs received by Ohio EPA for the period May 1, 2012 through June 1, 2012, indicates that eDMR data has not been submitted for this facility.

### **Limit Violations**

No limit violations were noted for the time period reviewed.

### **Reporting Violations**

No reporting code or reporting frequency violations were noted for the reporting period reviewed, but Ohio EPA notes that no eDMR was submitted for the month of May 2012. This report was due to be submitted by June 20, 2012 and per your NPDES permit, was to include flow readings, observations, and analytical monitoring. As the plant has not been constructed yet, the report should indicate no flow. Please provide a written explanation as to why data was not collected.

### **Compliance Schedule Violations**

Your NPDES permit does not contain a compliance schedule.

### **Other Violations**

#### **1. Failure to Report Monitoring Data**

Part III, Item 4 of your NPDES permit requires you to submit monitoring reports to Ohio EPA electronically. A review of Ohio EPA files finds no reports submitted for the month of May 2012. This information must be submitted as soon as possible. Instructions for establishing an eDMR account to submit data may be found under Part II, Item 4 of your NPDES permit on page 12.

### **Comments**

Ohio EPA offers the following comments:

#### **1. Designate an Operator of Record**

Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by Ohio Administrative Code (OAC) 3745-7-02. No official designation has been received by Ohio EPA Central Office. Ohio EPA's operator of record designation form may be found at:

[http://epa.ohio.gov/portals/28/documents/opcert/Operator\\_of\\_Record\\_Notification\\_Form.pdf](http://epa.ohio.gov/portals/28/documents/opcert/Operator_of_Record_Notification_Form.pdf).

Although the plant is not yet constructed, Ohio EPA recommends that you designate an Operator of Record so that they may commence operations as soon as this plant is constructed. Please complete the operator of record form and return to Ohio EPA Central Office. Please provide this office with a courtesy copy of the ORC form in replying to this letter.

#### **2. Facility Log Book**

Please be aware that records required pursuant to OAC 3745-7-09(A)(3) must be maintained at the facility and made available for inspection as required by rule which includes a log book, copy of the contract, and a copy of the NPDES permit. A log book must be maintained at the WWTP and available for inspection 24 hours a day. This is typically

accomplished by posting a mailbox or some other weather-tight container at the WWTP. The log book must include dates, sign-in and sign-out times to demonstrate that minimum staffing requirements are being met under OAC 3745-7-04. Your facility must be staffed by a licensed operator twice weekly for a total of one-hour.

3. Annual Sludge Report

Ohio EPA notes that Part II, Item I of your NPDES permit requires you to submit a report no later than January 31<sup>st</sup> summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year.

4. Outfall Signage

Ohio EPA notes that Part II, Item J of your NPDES permit requires you to post a sign at your outfall along the unnamed tributary to Cowles Creek. This sign must be posted by September 1, 2012.

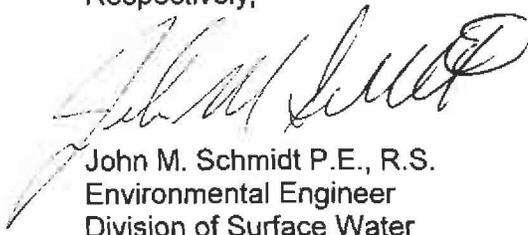
5. Sanitary Sewer Permits

During the site visit, Sombrero Properties, LLC indicated that there may be future plans to extend additional sanitary sewers to convert current campsites without sanitary service to sites that include sanitary service. I have attached for your reference a fact sheet that outlines when a PTI is required for sanitary sewer extensions.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions 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

Enclosures: Operator of Record Notification Form (May 2011), 1pp  
PTI Requirements for Sanitary Sewer Projects (June 2008), 2pp

File: Semipublic/Ashtabula/Geneva Twp/Willow Lake Campground (3PR00548)