Ohio | Environmental Protection Agency

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

June 21, 2012

Daniel Fonseca
Administrator
Camp McPherson
21880 Shadley Valley Rd
Danville, OH 43014

Re: Camp McPherson
NPDES Permit 4PX00019/ OH0113671
Compliance Evaluation Inspection
Knox County

Dear Mr. Fonseca:

On June 12, 2012, a Compliance Evaluation Inspection was conducted at the Camp McPherson . Present for the inspection were Kevin Dean from Dean's Backflow Service, LLC, Phil Farnlacher and myself of the Ohio EPA, Central District Office.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The inspection raised several concerns which must be addressed in the following areas:

Outfall Signage - In accordance with Part II. K. (page 6) of the effective NPDES permit a sign identifying the location of the outfall 001 discharge to the unnamed tributary to the Shadley Valley Creek was required to be installed no later than January 1, 2012. Please have the sign installed no later than 30 days following the receipt of this correspondence.

Non-compliance Notification - Please be advised that Part III-12 of your effective NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. Please provide an explanation for the violations noted in the table and a description of the corrective actions taken or proposed to resolve future violations. Please also provide the required explanations for all future permit violations from this point forward.

Daily Plant Observations – The effective NPDES permit requires that readings for color, odor and turbidity be taken on a daily basis. Please make arrangements with the permanent camp personnel to begin taking these readings.

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

Michael Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

c: File Copy
Kevin Dean, Dean's Backflow Service, w/enclosures

ec: Mike Sapp

MS/nsm Camp McPherson 12

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PX00019	OH0113671	CEI	S	Semi-Public

Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
6/12/2012	12:00 PM	12:30 PM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Camp McPherson 21880 Shadley Valley Rd Danville, Ohio 43014	9/1/2011 Permit Expiration Date 8/31/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Kevin Dean – Contract Operator Dean's Backflow Service	(419) 994-1622
Name and Title of Responsible Official	Phone Number
Daniel Fonseca, Administrator	(740) 599-7110

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	No outfall sign. No non-compliance notification or daily color, odor turbidity readings
S	Operations & Maintenance	Effluent weir needed scraped
S	Facility Site Review	
U	Collection System	Break in line causing silt in plant
S	Flow Measurement	
M	Receiving Waters	Effluent violations in 2010 and 2011
S	Laboratory	

Comments:

Signatures	
Michael Sapp 6/19/12	Erin Sherer 6/20/12
Michael Sapp, Inspector Date Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Date Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Method of flow monitoring:	

Type of alarms for plant:

SECTION D: PRELIMINARY TREATMENT

Type of Preliminary Treatment: Trash Trap
Does the Trash Trap need pumped: No
Maintenance of pretreatment components is: Satisfactory

Comments/Status:

SECTION E: AERATION

Color of sludge: Light brown
Quality of Sludge: Poor/Thin
Foam: No
Odor:No

	Yes	No		Yes	No
Aeration is taking place	X	☐	Plant is septic	☐	X
Blowers are operating	X	☐	Blowers are on a timer	X	☐
Skimmers are operating	X	☐	Plant is flooded	☐	X
Diffusers are operating	X	☐	Grating is present	X	☐
Sludge return is operating	X	☐			

Maintenance of aerating equipment is satisfactory

Comments/Status:

SECTION F: CLARIFIERS

Clarity: Clear
Condition of Weir: Poor (needs scraped)
Weir is level: Yes
Effluent in weir: Yes
Clarifier walls need scraped: No
Pin floc observed: No
Sludge blanket visible: No

Overall maintenance of settling components is: Satisfactory

Comments/Status:

SECTION G: TERTIARY TREATMENT

	Yes	No		Yes	NO
Surface sand Filters:	Y	☐	Subsurface/Upflow	☐	X
Distribution box operating	Y	☐	Beds alternated	X	☐
Are filters ponding/flooding	☐	X	Beds raked	X	☐
Sand filters overgrown	☐	X	Chlorination present	X	☐
UV present	☐	X	Dechlorination present	X	☐

Frequency of cleaning: Satisfactory
Fixed media upkeep: NA
Overall maintenance of components is: Satisfactory

Comments/Status:

SECTION H: SLUDGE HANDING / STORAGE DISPOSAL

Hauler name: No sludge hauled in several years
Disposal Site: NA
Sludge wasted from: NA
How often is sludge wasted: Rarely
Sludge drying beds: No Sludge holding tank: No

Overall maintenance of components is: Satisfactory

Comments/Status:

SECTION I: RECORD KEEPING / OPERATOR OF RECORD

(a) Wastewater Treatment Works classification (OAC 3745-7).....A
(b) Operator of Record holds unexpired license of class required by Permit.....Y
(c) Copy of certificate of Operator of Record displayed on-site.....N
(d) Has the Operator of Record submitted an ORC Notification form...Y
(e) Minimum operator staffing requirements fulfilled (OAC 3745-7)....Y
(f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met.....NA
(g) Operator of Record log book provided.....Y
(h) Format of log book (e.g. computer log, hard bound book)

Hard bound book

(i) Log book kept onsite (in an area protected from weather).....Y
(j) Log book contains the following:
  I. Identification of treatment works.....Y
  II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7.....Y
  i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.).....N
  ii. Laboratory results (unless documented on bench sheets)...N
  iii. Identification of person making entries.....Y
(k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred.....N

Comments/Status:

SECTION J: PLANT DISCHARGE

Discharge point is a: outfall pipe to stream
Name of discharge point: Unknown
Discharge is visible: Operator could not locate outfall
Quality of Effluent: Unobservable

Comments/Status

ADDITIONAL INFORMATION
Camp McPherson
4PX00019- OH0113691

General

The wastewater treatment plant serving Camp McPherson has a design treatment capacity of 20,000 gpd with a discharge to an unnamed tributary to Shadley Valley Creek. Wet stream process provided at the facility include a trash trap, extended aeration, clarification, tertiary dosing tank, tertiary sand filtration, chlorination and dechlorination. Liquid sludge is hauled to another POTW for further processing; solids removed from the sand filters are disposed of in a dumpster.

1. At the time of the inspection, the following general observations were made regarding the operation and maintenance of the plant:

    - The camp is equipped with a full service kitchen which has a grease trap installed.

    - Solids have not been wasted from aeration or pumped from the trash trap for several years.

    - Solids under aeration appeared extremely thin.

    - The blowers are operated in an on/off mode of operation. They're currently set for 4 hours on followed by 2 hours off.

    - The plant appears to be both hydraulically and organically under loaded. Flows typically average less than 3000 gpd during the peak summer months.

    - Coshocton Environmental Laboratories analyzes effluent samples in accordance with NPDES permit requirements. Plant operators perform field tests for dissolved oxygen, chlorine, pH and temperature.

    - Effluent flows are estimated using time elapsed meters of the doing pumps for the tertiary sand filters.

    - The effluent weir had a significant accumulation of algal growth and should be scraped or cleaned periodically to maintain proper hydraulics.

2. The NPDES permit requires that daily readings be taken for color, odor and turbidity. They are currently taken only on the two days a week the contract operator is at the site. Please make arrangements with the permanent camp personnel to begin taking these readings. Please also note that this deficiency was noted during the previous inspection.

3. A log book is kept on site although it only provides the operator's initials, the date of the plant visit with minimal operational details. Please ensure that the log book contains the following minimum components in accordance with OAC 3745-7-09:

   - Identification of the public water system, sewerage system, or treatment works.
   - Date and times of arrival and departure for the operator of record and any other operator required by this chapter.
   - Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced.
   - Results of tests performed and samples taken, unless documented on a laboratory sheet.
   - Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced.
   - Identification of the persons making entries.

4. A sign is required that identifies the location of the permitted outfall to the unnamed tributary to Shadley Valley Creek. Please have this sign posted within the next 30 days. The sign must comply with the following requirements:

   - The marker shall consist, at a minimum, of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height.
   - The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible.

5. Please be advised that Part III-12 of your effective NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. To date, no written responses have been received for the effluent violations experienced at the plant since the previous inspection. Please provide an explanation for the violations noted in the attached table and a description of the corrective actions

taken or proposed to resolve future violations. Please also provide the required explanations for all future permit violations from this point forward.

5. A break in the sewer line still exists from the kitchen facility which allows rainwater, soil and grit to get to the treatment plant during rain events. This was evidenced by the fact that the aeration tank had a silty appearance and silt was observed on the surface of the sand filters. **Please provide a schedule for the repair or replacement of this line.**

6. The post aeration system did not appear to be functioning. Please provide an explanation for this condition and have the blower repaired or replaced as soon as possible.

Compliance Data for Camp McPherson between 7/1/2010 to 6/1/2012

Summary
Permit Effluent Limit Violations: 6
Permit Effluent Code Violations: 2
Permit Effluent Frequency Violations: 1516
Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2010	001	Total Suspended Solids	30D Conc	12	14.	7/1/2010
July 2010	001	Nitrogen, Ammonia (NH3	30D Conc	1.5	3.27	7/1/2010
July 2010	001	Nitrogen, Ammonia (NH3	7D Conc	2.3	3.27	7/8/2010
February 2011	001	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.78	2/1/2011
February 2011	001	Nitrogen, Ammonia (NH3	7D Conc	4.5	5.78	2/1/2011
October 2011	001	E. coli	30D Conc	161	172.	10/1/2011

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
July 2010	001	Fecal Coliform	AK	7/12/2010
September 2011	001	E. coli	AK	9/27/2011

Flow Data for Camp McPherson between 7/1/2010 and 6/1/2012

	Date	Flows (MGD)
Ten Highest Flows	12/1/2011	0.014
	12/2/2011	0.014
	12/3/2011	0.014
	12/4/2011	0.014
	12/5/2011	0.014
	12/6/2011	0.014
	12/7/2011	0.014
	12/8/2011	0.014
	3/8/2012	0.014
	3/9/2012	0.014
Average Flow Rate		0.001