



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

May 31, 2013

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 30, 2013, 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. Pam Johnson, John Blough, And Aaron Grey represented Kenisee Grand River Campground (KGRC), during the inspection. Following the inspection, I spoke with you and Pam Johnson. 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 inspections were conducted on May 21, 2012, and January 30, 2013.

The sanitary package plant and land application system is designed to serve a shower house serving 32 campsites and 12 seasonal full-hookup campsites in an existing campground. A two-bedroom and three-bedroom apartment utilize an existing septic system, and the remaining campsites at this location are served by two on-site RV dump stations with holding tanks, which are pumped out for off-site disposal. The sanitary package plant 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 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. Daily plant flow varies widely, with the plant operating a peak average flow of about 1,200 gpd.
2. The plant is operated by Steve Howe, Donald Velisick, and Charles Newman of Ake Environmental, with Donald Velisick is the designated primary operator. John Plough, and Aaron Grey of Kenisee Grand River Campground operate the plant on days that it is not seen by Ake Environmental.
3. Log books, copy of the NPDES permit, 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 twice weekly.

4. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained. An exception appears to be the lack of a second dosing pump to feed the spray irrigation system. The spray irrigation system either be retrofitted to contain two pumps so that if one pump is inoperable the second pump is switched on (much like your flow equalization pumps or sand filter dosing pumps) or a second pump maintained on site and available to be immediately installed.
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 2012.
6. The aerated flow equalization tank was found in acceptable condition, with the exception that the steel grates were found in deteriorated condition. Mr. Grey indicated that new grates have been ordered. The blowers, pumps and alarms 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, pumps and alarms were cycled and found in operating condition.
8. The clarifier was noted as somewhat cloudy, with the return sludge lines and skimmer operating as designed. Effluent channels and weirs were reasonably clean.
9. Surface sand filter dosing 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 east bed was found in operation at the time of the inspection, with the west bed prepared and ready for use. 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. As noted above, the dosing tank for the spray irrigation system was found out of service due to a malfunctioning pump and control panel. This must be corrected immediately. The condition of the spray irrigation system is unknown due to a lack of a pump.
13. Samples are collected by Ake Environmental. The contract operator performs on-site analysis of pH and DO. Daily observations of flow, odor, color, and turbidity are noted in the logs by both Kenisee staff and Ake staff. Ake Environmental provides sample bottles and preservatives and performs laboratory analysis of collected samples. Ake Environmental submits data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

#### **NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2012 through May 1, 2013 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	00530	Total Suspended Solids	30D Conc	12.0	16.	6/1/2012
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	27.75	6/1/2012
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	27.75	6/1/2012
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.019	.02101	6/1/2012
601	80082	CBOD 5 day	30D Conc	10.0	15.1	6/1/2012
601	80082	CBOD 5 day	7D Conc	15.0	15.1	6/1/2012
601	00400	pH	1D Conc	6.5	6.1	7/2/2012

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any violations, along with measures taken to ensure that they are not repeated within 24-hours of discovery. A fact sheet on this requirement may be found online at [http://epa.ohio.gov/portals/35/permits/24-hour Report FactSheet.pdf](http://epa.ohio.gov/portals/35/permits/24-hour%20Report%20FactSheet.pdf). Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. **To-date, Ohio EPA has not received an explanation for the effluent violations, what action was taken, and what measures will be taken so that they are not repeated.**

Reporting Violations

No reporting code violations or frequency violations were noted for the reporting period reviewed.

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 Applicable	-----	Construction	Submit PTI if Needed
12/01/2011	11/30/2016	06/01/2013	06/01/2013	05699	Construction	Achieve Final Limits E Coli
12/01/2011	11/30/2016	07/01/2012	04/16/2013	01299	Construction	Submit LAMP

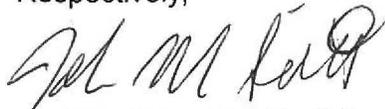
**To-date, Ohio EPA has not received a status report on the ability of the treatment system to meet effluent limits for E. Coli.** Based upon a review of the eDMR data for the time period reviewed, it appears that this facility will be able to meet the effluent limits. **Please provide a bacteria status report as soon as possible.** Ohio EPA also notes that the land application management plan (LAMP) has been submitted late; however, it was submitted. Ohio EPA completed a review of the LAMP and found it deficient. Ohio EPA is still awaiting revisions to an April 29, 2013 deficiency letter. **Please submit revisions to the LAMP as soon as possible.**

Based on the above information, Kenisee Grand River Campground remains in **substantial noncompliance** with the terms and conditions of your NPDES permit. **It is imperative that Ohio EPA receive a written response to these violations. The above items must be addressed and the revised Land Application Management Plan submitted 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  
Pam Johnson

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