



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

Re: Indian Trail Campground
NPDES Permit 2PR00185/OH0132535
Semi-Public CEI
Huron County

August 28, 2013

Ms. Eve Cross, Manager
Indian Trail Campground
189 Benedict Avenue
Norwalk, Ohio 44857

Dear Ms. Cross:

On July 31, 2013, I conducted an inspection of the wastewater treatment plant (WWTP) at the Indian Trail Campground. You and Mr. Ernie Ross were present and provided information on plant operations and maintenance. The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit, and to evaluate the operation and maintenance of the plant.

The blower in the aeration tank is being operated using a timer. Some light floating solids were observed in the clarifier and some solids were built up in the clarifier effluent weir. Mr. Ross indicated that he believes that these conditions were caused by the plant being down for a few days the previous week due to electrical problems with the aeration system. The repairs had recently been completed and all major treatment units were in operation at the time of the inspection. No discharge from the plant was occurring, although, the water in the chlorine contact tank appeared clear.

We also discussed that the flow rate is being estimated. In order to more accurately record the plant flows, we request that you install hour meters on the sand filter dosing pumps. These meters will tell you how long the pumps run each day. Using that information and the pumping rate of the pump, you should be able to calculate the flow rate of wastewater that is being discharged.

We were unable to determine compliance with the record keeping requirements of Ohio Administrative Code (OAC) Chapter 3745-7-09 due to the operator's log book not being available for review. Mr. Ross indicated that he had taken the log book home. You were informed of these record keeping requirements in our June 2011 inspection letter. Provisions need to be made so that these records are maintained and are easily accessible onsite for 24 hour inspection by Ohio EPA personnel. Please review OAC 3745-7-09 to make sure you can meet the requirements. You can view it online at: http://epa.ohio.gov/portals/28/documents/rules/Final/3745-07-09_effective_02-23-12.pdf.

A review of the discharge monitoring reports (DMR's) shows that your facility has had effluent limit violations and is in significant non-compliance of the Chlorine Residual parameter of your permit between January 1, 2013, and July 1, 2013. A list of the violations is enclosed.

Ms. Eve Cross
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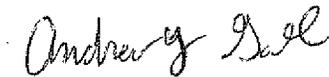
It was noted that all four chlorine tablet feeder tubes were completely full at the time of our inspection. This may be causing high chlorine levels that are not able to be fully removed by the de-chlorination tablets. You may want to consider only using three chlorine tablet feeder tubes to see if that helps reduce chlorine residual levels while still providing adequate disinfection. We also discussed that you may want to evaluate replacing the chlor/de-chlor tablet feeders with a UV light to disinfect the water prior to discharge. If you decide to switch to a UV light, you must submit detail drawings and a Permit to Install (PTI) application to Ohio EPA for review and approval prior to the UV light being installed.

We request that you submit a written response to my attention within **14** days of receiving this letter. The response should outline how you plan to prevent future Chlorine limit violations and how you plan to comply with the record keeping requirements of OAC 3745-7-09.

In the near future you will be receiving a draft copy of the renewal NPDES permit for the WWTP. Please make sure that you review it and submit any comments to us before the end of the 30 day public comment period.

If you have any questions or comments concerning the enclosed inspection report or the draft NPDES permit, please contact me at 419-373-3003 or by e-mail at Andrew.gall@epa.ohio.gov.

Sincerely,



Andrew Y. Gall, P.E.
Environmental Specialist II
Division of Surface Water
Northwest District Office

/jlm

Enclosures

pc: Mr. Ron Hackenberger, Owner – Indian Trails Campground

ec: Andrew Gall
Tracking Program

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PR00185	OH0132535	CEI	S	
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
8/1/2013	11:00 AM	12:00 PM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Indian Trail Campground 1400 US Route 250 South Fitchville, OH 44851	10/1/2008
	Permit Expiration Date
	9/30/2013
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Eve Cross, Manager Ernie Ross, Operator	419-929-1135
Name and Title of Responsible Official	Phone Number
Eve Cross, Manager	(419) 929-1135

SECTION C: AREAS EVALUATED DURING INSPECTION	
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated	
M	NPDES Compliance
S	Operations & Maintenance
S	Facility Site Review
S	Collection System
M	Flow Measurement
S	Receiving Waters
N	Laboratory

Comments:

Signatures	
 8/26/13	 8/26/13
Andrew Y. Gaff, Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office

Compliance Data for Indian Trail Campground between 1/1/2013 to 8/1/2013

Summary

Permit Effluent Limit Violations: 5

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Milestones Not Entered: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2013	001	Chlorine, Total Residu	1D Conc	0.019	2.	5/1/2013
May 2013	001	Chlorine, Total Residu	1D Conc	0.019	.33	5/8/2013
May 2013	001	Chlorine, Total Residu	1D Conc	0.019	.48	5/22/2013
June 2013	001	Chlorine, Total Residu	1D Conc	0.019	.73	6/11/2013
July 2013	001	Chlorine, Total Residu	1D Conc	0.019	.41	7/16/2013

Average Daily Design Flow:	20,000 gpd
Average Daily Flow:	10,000 gpd
Plant Serves:	Campground
Method of flow monitoring:	Estimate
Type of alarms for plant:	

SECTION D: PRELIMINARY TREATMENT

Type of Preliminary Treatment?	Trash Trap	
	Yes	No
Does the unit require pumping or cleaning?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Maintenance of preliminary treatment is satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status:

SECTION E: AERATION

Color of MLSS?	Light Brown				
Thickness of Sludge	Medium				
Foam	None present				
Odor	No objectional odor present				
	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
Overall maintenance satisfactory?				<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status:

Plant timer was recently replaced.

SECTION F: CLARIFIERS

Clarity of water	Solids present	
Effluent in weir	Light Solids	
	Yes	No
Weir is clean?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Weir is in good condition (i.e., level, free of corrosion, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is effluent present in weir channel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the sludge blanket visible?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Do the clarifier walls need scraping?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is sludge settling properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overall maintenance of the clarifier is satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status:

Mr. Ross indicated plant had been offline for a few days prior to my inspection in order to repair and replace broken timer on aeration blower system. As a result there was some light floating solids in the clarifier and some solids build up in the weir.

Mr. Ross indicated he would scrap the sludge out of the weir.

SECTION G: TERTIARY TREATMENT

	Yes	No		Yes	No
Surface sand filters:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface/Upflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overall maintenance satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Frequency of cleaning: Sand filters cleaned as needed

Fixed media upkeep: N/A

Comments/Status:

SECTION H: SLUDGE HANDING / STORAGE DISPOSAL

Sludge is periodically wasted from what component?	Sludge holding	
Sludge disposal contractor?	Septic Hauler	
Sludge disposal location?	Municipal WWTP	
	Yes	No
Does the WWTP have sludge drying beds?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the WWTP have a sludge holding tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the maintenance on the sludge handling unit adequate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status:

SECTION I: RECORD KEEPING / OPERATOR OF RECORD

	Yes	No
Operator of Record holds unexpired license of class required by Permit?	<input type="checkbox"/>	<input type="checkbox"/>
Has the Operator of Record submitted an ORC Notification form?	<input type="checkbox"/>	<input type="checkbox"/>
Copy of certificate of Operator of Record displayed on-site?*	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If a Staffing Reduction plan has been approved, are the stipulations of the plan being met?	<input type="checkbox"/>	<input type="checkbox"/>
Operator of Record log book provided?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Minimum operator staffing requirements fulfilled (OAC 3745-7)?	<input type="checkbox"/>	<input type="checkbox"/>
Log book kept onsite (in an area protected from weather)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Log book contains the following:		
Identification of treatment works	<input type="checkbox"/>	<input type="checkbox"/>
Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	<input type="checkbox"/>	<input type="checkbox"/>
Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
Laboratory results (unless documented on bench sheets)	<input type="checkbox"/>	<input type="checkbox"/>
Identification of person making entries	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>
Logbook Format	Choose an item.	

Comments/Status:

Not able to determine compliance with Log Book requirements as log book was not available to review.

SECTION J: PLANT DISCHARGE

Discharge point is:	Stream
Discharge is visible:	No discharge at time of inspection
Name of discharge point:	Southwest Branch of Vermillion River
Marker present:	
Quality of effluent:	
Contract laboratory:	City of Norwalk

Comments/Status