



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

August 22, 2013

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

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 August 21, 2013, a follow up 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, with your and Steve Klaue representing Sombrero Properties, LLC, owner, Dustin Lewis representing Lewis Wastewater Services your contract operator, and David Rapp representing David Rapp Engineering, your proposed design engineer 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 and to address a sampling issue associated with the facility. The last compliance inspection was conducted on May 30, 2013.

Construction on the WWTP was completed on September 15, 2012 and plant startup occurred on April 17, 2013. Construction of the collection system that will feed the plant is ongoing. The new system consists of a new dump station with a 1,000-gallon trash trap, 3,866 LF of eight 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 serves an existing campground with a 150 units total consisting of 136 RV sites (55 of which to be full-hookups) and 14 primitive sites (tent only) with a bathhouse and dump station. The facility is located at 3935 State Route 534, Geneva Township, Ashtabula County. The system is located north of the current campground. No backup power is provided to the facility, however the facility has alarms.

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

Observations and Notations

The following observations and notations were made during the inspection:

1. The plant has a design capacity of 10,000 gpd. While the plant has undergone startup, the plant is currently receiving a very low flow.
2. The plant is operated by Mr. Dustin Lewis of Lewis Wastewater Services on behalf of Sombrero Properties, LLC. The plant is operated by Mr. Steve Klaue on days when the plant is not seen by Lewis Wastewater Services.

3. Construction was completed on the plant on September 15, 2012 at the conclusion of the 2012 camping season. The plant was briefly started on April 17, 2013, but did not receive wastewater flow until June 1, 2013.
4. 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.
5. The trash trap, lift station, and flow equalization tanks were found operational. Pumps and alarms were cycled and found operational.
6. The septic tanks appear to be in acceptable condition.
7. The sand filter dosing tank pumps and alarms were cycled and found in operational condition.
8. The recirculating sand filters appear in operational condition.
9. The ultraviolet light disinfection system appears in acceptable condition.
10. The final discharge was found to be of acceptable visual quality of clear with no noticeable odor or color. The outfall pipe is located in the bottom of the channel, requiring the operator to collect a sample that could entrain sediments from the receiving waters. Outfall signage is posted as required by the permit.
11. Onsite samples will be collected and analyzed by the Lewis Wastewater Services. Laboratory analysis will be performed by Lewis Wastewater Services. Data is reported by the Sombrero Properties, LLC on the electronic discharge monitoring reports (eDMRs). June 2013 eDMR data has been submitted; however, Ohio EPA does not have any record of receipt of the July 2013 eDMR data.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2013 through August 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as indicated below:

Effluent Limit Violations

The following effluent limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	111.	6/1/2013
001	00530	Total Suspended Solids	7D Conc	18	111.	6/22/2013
001	00530	Total Suspended Solids	30D Qty	0.46	1.80658	6/1/2013
001	00530	Total Suspended Solids	7D Qty	0.68	1.80658	6/22/2013
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	11.06	6/1/2013
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	11.06	6/22/2013
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.038	.18001	6/1/2013
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.057	.18001	6/22/2013

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any effluent violations,

along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. As discussed with you, your operator, and your design engineer during the inspection, Ohio EPA has not received a written notification of the June 2013 violations. A verbal explanation provided for these violations include both plant startup for the ammonia-nitrogen violations and difficulty in collecting a representative sample from the final outfall for the suspended solids violations. During the visit we discussed possible remedies, which will require a permit-to-install (PTI) for plant modifications. If violations like these continue, Willow Lake Campground could be placed into **significant noncompliance** with the terms and conditions of your NPDES permit.

Reporting Violations

A review of your eDMR reports indicates that no data was reported in the eDMRs for the July 2013 reporting period. Pursuant to your NPDES permit, this data was due to be submitted to Ohio EPA no later than August 20, 2013. eDMR reports must be filed no later than the 20th of each month for the preceding month's data. Please submit the July 2013 eDMR report to Ohio EPA as soon as possible.

Proposed Plant Improvements

During the inspection, we discussed ways to ensure that your operator is able to collect a free-flowing sample. Plant improvements discussed include installing an effluent lift station and sampling crock. These improvements will require a permit-to-install (PTI) application to be submitted, along with the associated fees, plans, specifications, and forms.

Storm Water Management

During the inspection, Ohio EPA notes that a large area of undisturbed area was created by installing and grading new campsites. Storm water controls such as silt fencing and silt traps should be installed to prevent sediment laden soils from reaching waters of the state.

Please inform this office, in writing, 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.

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If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,

A handwritten signature in blue ink, appearing to read "John M. Schmidt".

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Dustin Lewis, Lewis Wastewater Management

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