



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

Re: **Notice of Violation**
Erie County
Kelleys Island State Park
Ottawa County
South Bass Island State Park
NPDES Permit

September 20, 2013

Ms. Melissa Taylor, Operations
Ohio Department of Natural Resources
Division of Parks and Recreation
2045 Morse Road, Building C-3
Columbus, Ohio 43229-6693

Dear Ms. Taylor:

On September 4, 2013, an inspection was made of the wastewater treatment facilities serving the Kelleys Island State Park Campground. Mr. Jon Quisenberry was present and provided information on plant operations. In general, both operation and maintenance appeared good. At the time of my visit, all major treatment components were in operation and a clear final effluent was observed being discharged to the North Pond.

A major unresolved compliance issue continues to be the lack of a licensed Operator of Record (ORC) to meet the minimum staffing requirement of two visits/week, as indicated in the National Pollutant Discharge Elimination System (NPDES) permit. It is our understanding that there have been no visits made the entire year by Mr. Ken Griffith, your designated ORC, to either Kelleys Island or South Bass Island treatment facility. Also, our records indicate that NPDES permit electronic discharge monitoring reports (eDMRs) have not been submitted for either facility since May 2013.

We received a letter from Tara Kinsey Lee, P.E., dated July 23, 2013, acknowledging the lack of a licensed operator at both facilities and indicated that the operator position would be filled by mid-August. As of this date, we have not been notified that an operator has been hired.

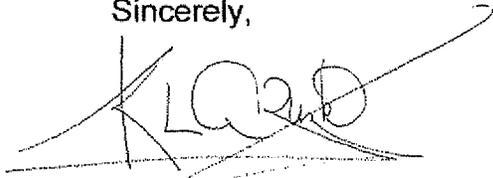
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The lack of an ORC to meet the minimum staffing requirement and non-submittal of eDMR's are serious violations of the NPDES permit at both state operated park facilities. Please notify us of your intention within 14 days to bring both facilities into compliance.

Failure to satisfactorily respond to the above violations may result in escalated enforcement action by Ohio EPA.

Enclosed is my completed inspection report for Kelleys Island. If you have any questions, please call me at (419) 373-3020, or email at rick.zuzik@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'KLQZ', with a long horizontal line extending to the right across the signature.

Richard A. Zuzik, MSE
Division of Surface Water

/jlm

Enclosure

pc: Erie County Health Department
Ottawa County Health Department

ec: Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY
 OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 150,000 GPD

NPDES Permit No. 2PP00042 *

Facility Name Kelleys Island State Park Expiration Date 11-30-15
 Facility Location Division St. Date 9-4-13 Time 11:40 (AM) (PM)
 City Kelleys Island County Erie Township -
 Name of Owner ODNR, Div. of Parks & Rec Owner Phone _____
 Person Contacted Jon Quenberry Operator of Record Ken Griffith
 Flow: Design 20,000 GPD WWTP Classification: ✓ A or 1
 Trib. Pop. 129 sites ~~(actual)~~ estimated Weather at time of inspection: Temp 80 ° Clear
 OEPA Personnel Rick Zuzik District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	Turbidity	Odor	Color
<u>0</u>	None	<u>Clear</u>	<u>None</u>	<u>Colorless</u>
1	Mild			
2	Moderate	Light Solids	Musty	Grey
3	Serious			
4	Extreme	Heavy Solids	Septic	Black

2. Effect of Effluent on Receiving Stream - Name: N. Pond

<u>✓</u>	None	Mild	Moderate	Serious
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3. a. Plant has _____ excellent ✓ good _____ fair _____ poor operation
 b. Plant has _____ excellent ✓ good _____ fair _____ poor maintenance
 c. Sand filters have _____ excellent ✓ good _____ fair _____ poor maintenance- N/A

Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) _____

Disinfection: (Required May 1 thru Oct. 31)		
IN	OUT	
_____	_____	Chlorination Tablets
_____	_____	Dechlorination Tablets
<u>✓</u>	_____	Ultraviolet (U.V.)

Yes No Min. Staffing and non-submittal of eDMRs since June, 2013

4. ✓ Compliance with NPDES Permit - Time Period: 1/13 to 9/13

Periodic Violations Y N Parameters: _____

Chronic Violations _____

5. ✓ O & M logbook kept and available on site: Location _____

6. ✓ Staffing Requirement Met (Class A -- 2 days per week for minimum 1 hour per week)
 (Class I -- 3 days per week for minimum 1.5 hours per week)

7. ✓ Adequate Plant Safety: Deficiencies _____

Facility Name: KJ State Park

Process	# Units	Unit	If Needed - Description and Comments
Preliminary		Trash Trap	Pumping Frequency
		Grease Trap	Pumping Frequency
	1	Bar Screen	bypass
	1	Comminutor	IN
	1	Flow Equalization	IN
Aeration Equipment		Plant Timer <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Cycle Time:
	2	Motor / Blower Unit	
Secondary Treatment	4	Aeration Tank	Color: <u>Brown</u> Adequate Aeration Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Final Settling	2	Clarifier	
	2	Sludge Return	In <input checked="" type="checkbox"/> Out <input type="checkbox"/>
	2	Surface Skimmer	In <input checked="" type="checkbox"/> Out <input type="checkbox"/>
		Fixed Media Clarifier	
Tertiary Treatment	4	Surface Sand Filter	1 ponded
		Polishing Pond	
		Other	
Disinfection		Contact Tank	
		Chlorine Tube Feeder	
		Dechlorination Tube Feeder	
	1	Ultraviolet (UV)	IN
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling	1	Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal		Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment		Post Aeration	
		Spray Irrigation	
		Other	