



**Environmental
Protection Agency**

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

November 2, 2011

Mr. Robert E. Miller, Jr.
Facility Director
Joy Outdoor Education Center, LLC.
Clarksville, Ohio 45113

Re: Joy Outdoor Education Center /Compliance Evaluation Inspection and **Notice of Violation**, NPDES Permit No. OH105392/OEPA Permit No. 1PZ00045*AD

Mr. Miller:

On October 28, 2011 I conducted an NPDES Compliance Evaluation Inspection at the Joy Outdoor Education Center (JOEC), during which you were present. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's NPDES Permit in preparation for the upcoming renewal of the permit.

All areas of the treatment facility appeared to be working properly. Please see attached report.

As discussed during the inspection, I have also reviewed your Discharge Monitoring Reports (DMRs) covering the months of March 2011 to September 2011 for the JOEC. My review indicates limit violations of the conditions of your NPDES Permit. The specific instances of noncompliance are noted at the end of the inspection report.

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

We have reviewed your reports addressing the reasons for the above violations and the actions being taken to prevent further occurrences. No additional information is requested at this time. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification".

If you have any questions, please contact me at (937) 285-6028 or michelle.waller@epa.state.oh.us.

Sincerely,

Michelle Waller
Division of Surface Water
michelle.waller@epa.state.oh.us

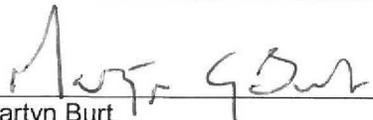


State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PZ00045*AD	OH0105392	10/28/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Joy Outdoor Education Center 10117 Old 3-C Highway Clarksville, Ohio 45113	10:00 AM	3/1/2007
	Exit Time	Permit Expiration Date
	11:20 AM	2/29/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Robert Miller – Facility Director	(937) 289-2031 ext. 223	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Robert Miller – Class A Operator 10117 Old 3-C Highway P.O. Box 157 Clarksville, Ohio 45113	(937) 289-2031 ext. 223	
Name, Address and Title of Responsible Official	Phone Number	
Robert Miller 10117 Old 3-C Highway P.O. Box 157 Clarksville, Ohio 45113	(937) 289-2031 ext. 223	

Ohio EPA Inspector	Ohio EPA Reviewer
 Michelle Waller Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
11/7/11 Date	11/7/11 Date

Average Daily Design Flow:	12,000 Gallons/Day
Plant Serves:	Number varies – seasonal camp
Average Daily Flow: (Period of Review):	5897 Gallons/Day (10/1/2010 – 10/1/2011)
Method of flow monitoring:	Flow meter
Type of alarms for plant:	EQ tank has a visual alarm

Pretreatment

Type of Pretreatment: **Grease Trap**
 Does the Trash Trap need pumped: **No**
 Maintenance of pretreatment components is: **Excellent**

Comments/Status:

Grease trap is pumped out once per month. Hauler was last there October 21, 2011.

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Thin**
 Foam: **Light (white)**
 Odor: **No objectionable 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 operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Good**

Comments/Status:

Both the EQ pump and the dosing tank pump have been replaced at the plant. Tarps are covering the treatment system (on a frame) to keep leaves out and for temperature assistance in the winter.

**Secondary Treatment
(Settling)**

Clarity: **Cloudy**
 Condition of Weir: **Some Algae/Solids Build Up**
 Weir is level: **Yes**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Good**

Comments/Status:

Tarps are covering the treatment system (on a frame) to keep leaves out and for temperature assistance in the winter.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<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 of components is: **Good**

Comments/Status:

No longer encountering problems with solids washing through to the filters. The sand beds are alternated weekly.

Sludge Handling/Storage Disposal

Hauler name: Neal Septic Service

Disposal Site: Wilmington WWTP

Sludge wasted from: Sludge tank

How often is sludge wasted: Once per month when busy

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Excellent**

Comments/Status:

Hauling is done usually the last week of the month. Grease trap is cleaned out at the same time.

Plant Discharge

Discharge point is a: **Ravine**

Name of discharge point:

Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Several small pockets of foam were observed at the outfall. Operator stated there had been cleaning done the previous day and the foam may be a result of that.

EFFLUENT LIMIT VIOLATIONS
(Period of Review: 3/1/2011 – 9/1/2011)

7D = Weekly 30D = Monthly 1D = Daily Conc. = Concentration (mg/l) Qty.= Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	Total Suspended Solids	30D Conc	12	25.	6/1/2011
June 2011	Total Suspended Solids	30D Qty	0.6	1.0598	6/1/2011
June 2011	CBOD 5 day	30D Conc	10	36.3	6/1/2011
June 2011	CBOD 5 day	30D Qty	0.5	1.53883	6/1/2011
June 2011	Total Suspended Solids	1D Conc	18	25.	6/23/2011
June 2011	Total Suspended Solids	1D Qty	0.8	1.0598	6/23/2011
June 2011	CBOD 5 day	1D Conc	15	36.3	6/23/2011
June 2011	CBOD 5 day	1D Qty	0.7	1.53883	6/23/2011
July 2011	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.81	7/1/2011
July 2011	Nitrogen, Ammonia (NH3	30D Qty	0.05	.10849	7/1/2011
July 2011	CBOD 5 day	30D Conc	10	16.3	7/1/2011
July 2011	CBOD 5 day	30D Qty	0.5	.62929	7/1/2011
July 2011	Nitrogen, Ammonia (NH3	1D Conc	1.5	2.81	7/21/2011
July 2011	CBOD 5 day	1D Conc	15	16.3	7/21/2011
August 2011	CBOD 5 day	30D Conc	10	20.9	8/1/2011
August 2011	CBOD 5 day	30D Qty	0.5	.58539	8/1/2011
August 2011	CBOD 5 day	1D Conc	15	20.9	8/25/2011
September 2011	CBOD 5 day	30D Conc	10	25.5	9/1/2011
September 2011	CBOD 5 day	30D Qty	0.5	.55015	9/1/2011
September 2011	CBOD 5 day	1D Conc	15	25.5	9/22/2011

Notes from the Inspection

During the inspection the topic of flow to the plant was discussed. The Joy Outdoor Education Center (JOEC) WWTP is designed to handle a flow of up to 12000 GPD. Over the last year, JOEC has averaged just under 6000 GPD, although that number is kept low due to the seasonal nature of the facility. From October 2011 to October 2012, JOEC had 36 days in which the reported flow rate was over the plant design of 12000. The highest flow rate reported was 37400 GPD. Every date the flow was reported over plant design an explanation was given for the high flow. Most of the extremely high flows were reported to be due to excessive rain. The other explanation given for high flows was the facility being highly utilized by clients.

As discussed both in e-mail correspondence and in person, JOEC has contacted the firms of Winelco, Inc. and Environmental Waste Water Services this fall to have them submit proposals for upgrading the treatment system to a design capacity of around 24,000 – 25,000 GPD. This upgrade would be to help deal with the days of excessive flow as well as the possible addition of a dining hall

and more cabins onsite. Please be advised that this plant upgrade will require a Permit to Install (PTI) for the Ohio EPA before construction can begin.

Inflow and Infiltration (I&I) appear to account for a significant amount of excess flow getting into the treatment plant. During the inspection while talking about I&I Mr. Miller stated that he had already checked that no downspouts/clean water connections were part of the system, and that one part of the collection system had been check by cameras and fixed. I advised Mr. Miller that JOEC may want to track flows between manholes in order to try and identify which sections may have the biggest I&I problems so those areas could possibly be targeted to cut down on unnecessary flow.