

**AGENCY OF NATURAL RESOURCES  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
1 NATIONAL LIFE DRIVE, MAIN 2  
MONTPELIER, VT 05620-3521**

**DRAFT INDIRECT  
DISCHARGE PERMIT**

Permit No: ID-9-0192  
PIN: EJ96-0542

**SECTION A - "ADMINISTRATION"**

In compliance with provisions of 10 V.S.A. §1263, and in accordance with the following conditions, the permittee:

Lakewood Campground, Inc.  
122 Champlain Street  
Swanton, Vermont 05488

is authorized to discharge treated domestic sewage from an existing spray disposal system serving Lakewood Campground in Swanton, Vermont, to groundwater and indirectly to Lake Champlain. **This is a permit renewal.**

A1. Permit Summary:

|                             |                        |
|-----------------------------|------------------------|
| Expiration Date             | December 31, 2022      |
| Type of Waste               | Domestic Sewage        |
| Treatment System            | Aerated Lagoons        |
| Disposal System             | Spray Disposal Area    |
| Town                        | Swanton                |
| Drainage Basin              | Upper Lake Champlain   |
| Receiving Water             | Lake Champlain         |
| Maximum Wastewater Disposal | 29,825 gallons per day |

A2. Compliance Schedule:

The following schedule summarizes the actions and requirements necessary for compliance with the conditions of this permit. The permittee shall complete the requirements in accordance with the dates indicated. See the designated section for specific details.

A2. Compliance Schedule (continued):

| <u>Condition # &amp; Description</u>  | <u>Schedule Date</u>   |
|---|--|
| A3. Apply for renewal of Indirect Discharge Permit  | September 30, 2022   |
| D3(A). Have a Vermont Registered Professional Engineer complete an inspection of sewage collection, treatment and disposal system | Annually during June   |
| D3(B). Submit Annual Inspection Report  | Annually by July 15th  |
| D3(C). Submit Implementation Schedule   | Annually by August 15th  |
| D9. Submit monthly disposal report  | Monthly, when in operation   |
| E2(A). Measure influent and effluent volumes and sample effluent  | As specified   |
| E2(B). Submit measurements and monitoring results   | By the 15th of the second month following the month of measurements and sampling |

A3. Expiration Date:

This permit, unless revoked, or amended shall be valid until December 31, 2022 despite any intervening change in Water Quality Standards or the classification of receiving waters. Renewal of this Indirect Discharge Permit will be subject to all rules applicable at the time of renewal, including biological standards to determine significant alteration of aquatic biota.

The permittee should apply for an Indirect Discharge Permit renewal by September 30, 2022 for continued authorization to discharge treated sewage. For the purposes of Title 3, an application for renewal of this indirect discharge permit will be considered timely if a complete application is received by the expiration date.

A4. Effective Date:

This permit becomes effective on the date of signature.

A5. Revocation:

The Secretary may revoke this permit in accordance with 10 V.S.A. §1267.

A6. Transfer of Permit:

This permit is not transferable without prior written approval of the Secretary. The permittee shall notify the Secretary immediately, in writing, before any sale, lease or other transfer of ownership of the property from which the permitted discharge originates. The proposed transferee shall make application for a permit to be reissued in their name. Failure to apply shall be considered a violation of this permit. Responsibility for compliance with the conditions of this permit shall be the burden of the permittee until such time as transfer of the permit to the transferee is complete. All application and operating fees must be paid in full prior to transfer of this permit. This permit shall be transferred only upon showing by the permittee or proposed transferee of compliance with the following conditions:

- a. The transferee shall be a legal entity, financially and technically competent to operate, inspect, maintain and replace the system.
- b. The transferee shall demonstrate that they have the legal authority to raise revenues for the proper operation, inspection, and maintenance of the system.
- c. The transferee shall provide a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee(s) to the Secretary.

A7. Minor Modifications of Permit:

The Secretary may modify this permit without requiring a permit application, a public notice, or a public hearing to correct typographical errors, or to increase the monitoring frequency in accordance with Condition E(4) of this permit.

A8. Indirect Discharge Rules:

This permit authorizes an existing indirect discharge.

This indirect discharge was reviewed and qualified for an Indirect Discharge Permit in accordance with Section 14-403 (A) of the Indirect Discharge Rules for existing indirect discharges of sewage. No increase in sewage volume is allowed without the written approval of the Secretary.

A9. Right of the Agency to Inspect:

The permittee shall allow the Secretary or the Secretary's authorized representative upon the presentation of their credentials and at reasonable times:

- a. To enter upon permittee's premises in which any effluent source, treatment or disposal system is located or in which any records are required to be kept under the conditions of the permit;
- b. To have access to and copy any records required to be kept under conditions of this permit;
- c. To inspect any monitoring equipment or method required in this permit;
- d. To sample any discharge of waste, groundwater or surface water; and
- e. To inspect any collection, treatment or disposal system required by this permit.

A10. Permit Availability:

A copy of this permit shall remain at the office of the permittee and upon request shall be made available for inspection by the Secretary.

A11. Minor Modifications to System:

Minor modifications of the collection, treatment and disposal system which do not reduce the treatment effectiveness or increase the capacity of the system may be approved in writing by the Secretary without permit amendment.

Before making any modifications to the system, the permittee shall submit plans to the Secretary for review and approval. These plans must be approved before any modifications or additions are made.

A12. Correction of Failed System:

The Secretary may, upon discretion, require the permittee to submit an application for an Indirect Discharge Permit Amendment for a replacement wastewater disposal system to replace a failed system if a replacement system was not previously approved in accordance with the design standards of the current Indirect Discharge Rules.

Before reconstruction of the failed system the permittee shall submit plans to the Secretary for review and approval. These plans must be approved before any reconstruction occurs. Due to the urgency of the need to correct failed disposal systems, the Secretary will process these Amendments as soon as possible.

A13. Operating Fees:

This indirect discharge is subject to operating fees. The permittee shall submit the operating fees in accordance with procedures provided by the Secretary.

**SECTION B "INDIRECT DISCHARGE"**

B1. Location of Indirect Discharge:

This existing indirect discharge is located in the Upper Lake Champlain drainage basin in the Town of Swanton, Vermont. The indirect discharge can be located on the USGS East Alburg, Vermont 7.5' quadrangle map at Latitude N 44°56'20" and Longitude W 73°12'45".

B2. Nature of Indirect Discharge:

According to the approved plans for the wastewater disposal system, the wastewater from the RV trailer sites, office, restrooms and recreation building is pumped to and treated in a two cell aerated lagoon. A second lagoon provides storage. Each lagoon has a capacity of approximately 780,000 gallons. The effluent is chlorinated and pumped to the sprayfield disposal area located north of the intersection of Lakewood Drive and Tabor Road.

The sprayfield consists of two spray zones, the East and West zones, with 13 sprinkler heads on each, for a total of approximately 3.5 acres of wetted area. Each line has its own spray pump which is manually activated. At 2.0 inches per week over the wetted area, the sprayfield is capable of disposing of a maximum of 203,157 gallons per 7-day period.

In 1992 when the original indirect discharge permit was issued, the wastewater design flow was established at 29,825 gallons per day in accordance with the 1985 Environmental Protection Rules Guidance for Camp and Travel Trailer Parks. The design flow was based on 181 campsites with individual water and sewer service and 72 campsites with a central comfort station with showers.

According to a February 4, 2013 letter submitted on behalf of the permittee, the campground currently has 217 campsites and 3 cabins with water and sewer service, 19 campsites with only water service and 1 cabin with no water or sewer service. This equates to a design flow of 29,500 gallons per day based on the Environmental Protection Rules, effective September 29, 2007.

## **SECTION C "SYSTEM APPROVALS"**

### **C1. Previous Approvals:**

The sewage treatment and disposal system was originally approved by Certificate of Compliance No. 6F0164 on May 20, 1977. The Certificate granted approval for the wastewater treatment and disposal system for 102 campsites with water and sewer hookups, and 72 sites with water hookups only. The following approved plans were prepared by Kenneth W. Pinkham, P.E.:

- a. Sheet 1 of 22, dated March 9, 1977, revised April 7, 1977;
- b. Sheet 2 of 22, dated October 25, 1971, supplemented April 29, 1977;
- c. Sheets 3, 4 and 5 of 22, dated March 27, 1972, revised May 12, 1972;
- d. Sheet 6 of 22, dated March 3, 1977, revised April 25, 1977;
- e. Sheet 7 of 22, dated March 3, 1977, supplemented March 18, 1977;
- f. Sheets 8 and 9 of 22, dated March 9, 1977;
- g. Sheet 10 of 22, dated May 6, 1977;
- h. Sheets 11 and 12 of 22, dated March 9, 1977;
- i. Sheet 13 of 22, dated April 27, 1977.

Certificate of Compliance 6F0164-1 was issued on June 13, 1977 for the construction of restrooms. The project was to be completed according to the following plans prepared by Kenneth W. Pinkham, P.E.:

- a. Sheet 2 of 22, dated October 25, 1971, last revised June 3, 1977; and
- b. Sheet 23 of 23, dated May 23, 1977.

Certificate of Compliance 6F0164-3 was issued on July 5, 1978 for the addition of 40 trailer sites. The project was to be completed according to the following plans prepared by W. C. Belschner, P.E.:

Sheets WSP-1-1, WSP-1-2, and WSP-1-3, dated January 1978.

## **SECTION D "SYSTEM OPERATION"**

### **D1. General Operating Requirements:**

The sewage treatment and disposal system shall be operated at all times in a manner that will: (1) not permit the discharge of sewage onto the surface of the ground; (2) not result in the surfacing of sewage; (3) not result in the direct discharge of sewage into the waters of the State; and (4) not result in a violation of the Vermont Water Quality Standards. The spray disposal fields shall be operated at all times in accordance with the following limits:

D1. General Operating Requirements (continued):

- a. No spraying shall be conducted when groundwater is closer than one foot to the ground surface in the disposal area as indicated by the water level in the groundwater monitoring wells.
- b. No spraying shall be conducted if there is any surface runoff occurring within the spray disposal area.
- c. No spraying shall be conducted when the air temperature is below 10° F.
- d. The total wastewater applied to the sprayfield shall not exceed 2.0 inches on the wetted area of the field in any consecutive seven (7) day period.
- e. The maximum hourly rate of wastewater application shall not exceed 0.25 inches per hour.
- f. There shall be a minimum of a 24-hour rest period between spray applications for any spray line.
- g. The effluent shall have a minimum of 4.0 ppm total chlorine residual (or 1.0 ppm free chlorine residual) at the spray nozzle at all times.

D2. Effluent Limits:

The sewage treatment and disposal system shall be operated at all times to comply with the following limits:

| <b>Parameter</b>                             | <b>Maximum at Anytime</b>                                 |
|--|---|
| Spray Disposal Flow                          | 2.0 inches per 7-day period for wetted area of sprayfield |
| Biochemical Oxygen Demand (5-day)            | 30 mg/L   |
| Total Suspended Solids                       | 30 mg/L   |
| pH   | 6.5 - 8.5 Standard Units                                  |
| Escherichia coli                             | 77 colonies / 100 ml                                      |
| Chlorine Residual (measured at spray nozzle) | 4.0 mg/L (minimum - total) or 1 .0 mg/L (minimum - free)  |

D3. Annual Inspection, Report and Implementation Schedule:

A. Annual Inspection:

Annually during the month of June, the permittee shall retain a Vermont Registered Professional engineer to conduct a thorough inspection, evaluation and report of the sewage collection, treatment and disposal system. The engineer's inspection shall include, but not be limited to the following:

1. inspecting the entire sewer collection system to observe the condition of the sewer lines, noting any signs of inflow or excess infiltration;
2. verifying the proper operation of system components, including the pump station pumps, alarms and controls, aerators and chlorinator;
3. checking the calibration of the spray effluent pumps and meters;
4. walking the perimeter of the lagoons and checking the integrity of the lagoon liner;
5. walking each spray lateral in the sprayfield and checking for the proper operation of the spray system, noting any repairs needed and any areas of erosion or concentrated runoff;
6. checking the condition of the monitoring wells in the spray disposal area and determining the depth to groundwater (below ground surface) on the day of the inspection; and
7. noting any necessary repairs or maintenance that needs to be performed on the sewage collection, treatment and disposal system.

B. Annual Inspection Report:

By July 15th each year, the permittee shall have a professional engineer submit a report of the inspection including the following items:

1. a complete list of the items inspected and the results of the inspection;
2. a discussion of the recommended repairs and maintenance required;
3. a tabulation of the groundwater levels in the sprayfield on the day of the inspection; and
4. an evaluation of compliance with the effluent limits during the previous year, and if necessary, recommend any changes to the operation of the system to assure compliance.



D3. Annual Inspection, Report and Implementation Schedule (continued):

C. Implementation Schedule:

By August 15th each year, the permittee shall notify the Secretary in writing stating how the engineer's recommendations are to be implemented, including submittal of a schedule for the required repair and maintenance items which have not yet been completed.

D4. System Operation and Maintenance:

The sewage collection, treatment and disposal system shall be operated and maintained at all times in a manner satisfactory to the Secretary and in a manner that will not pose a risk to the public health and safety, or cause contamination of drinking water supplies, groundwater and/or surface water.

D5. Reporting of Failures:

The permittee shall immediately report any failure of the wastewater collection, treatment or disposal system to the Secretary, first by telephone within 24 hours of the failure and then in writing within 5 days of the failure. The written notice shall include a discussion of the actions taken or to be taken to correct the failure.

D6. Operator Certification:

The permittee is required at all times during operation of the wastewater system to employ a wastewater treatment facility operator with a minimum Grade I operator certificate in accordance with the September 25, 2014 Wastewater Treatment Facility Operator Certification Rule. The permittee shall notify the Secretary in writing of any change in operators.

D7. Treatment and Storage Pond Freeboard:

A two (2) foot freeboard between the top of the berm and the water surface shall be maintained in the treatment pond and effluent storage pond at all times.

D8. Discharge Restrictions:

The permittee shall not allow any person to discharge or cause to be discharged anything other than sanitary sewage to this collection, treatment and disposal system.

D9. Monthly Report:

On a monthly basis when the wastewater system is in operation, the permittee shall submit a disposal report to the Secretary summarizing all information required for the previous month. The report shall be submitted to the Secretary by the 15th of each month for all disposal activities for the previous month. The report shall be signed by an official of the permittee, under the following statement:

"I certify under penalty of law that I have personally examined, and am familiar with, the information submitted herein. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment."

**SECTION E "MONITORING"**

E1. Sampling and Testing Procedures:

All wastewater, groundwater and surface water sampling, preservation, handling and test procedures used to comply with the monitoring requirements herein shall conform to procedures specified in the most current edition of Standard Methods for the Examination of Water and Wastewater APHA - AWWA - WPCF, and the Vermont Water Quality Standards unless written approval of an alternate method is received from the Agency.

The laboratory utilized for analyzing the samples shall demonstrate successful participation in third party proficiency testing recognized by ISO or NELAP for all parameters and shall analyze any check sample provided by the Secretary. Failure to obtain an acceptable result for either the Secretary's check sample or successful third-party proficiency testing may be a basis for requiring an alternate analytical laboratory.

E2. Influent and Effluent Monitoring:

A. Chemical Monitoring:

Starting the first day of operation of the treatment facility each year, the permittee shall monitor, sample and analyze the influent to the treatment system and the effluent sprayed in the disposal field during the period of operation of the facility in accordance with the following:

E2. Influent and Effluent Monitoring (continued):

| <b>Parameter</b>  | <b>Measurement Location</b>  | <b>Sample or Measurement Type</b> | <b>Sample or Measurement Frequency</b> |
|---|------------------------------|-----------------------------------|--|
| Influent Flow   | Influent to Treatment Lagoon | Daily Total                       | Daily                                  |
| Aerated Lagoon and Storage Lagoon Levels  | Staff Gage                   | Feet and tenths of feet           | Weekly                                 |
| Dissolved Oxygen  | Aerated and Storage Lagoon   | Grab                              | Weekly                                 |
| Depth to groundwater (below ground surface)   | Sprayfield monitoring wells  | Feet and tenths of feet           | Weekly                                 |
| Total Chlorine Residual   | Effluent spray nozzle        | Grab                              | Daily, when spraying                   |
| Effluent Flow (each spray line)   | Effluent pump meters         | Daily Total                       | Daily, when spraying                   |
| Spraying Duration   | Effluent pump meters         | # Hours                           | Daily, when spraying                   |
| Biochemical Oxygen Demand (5-day)   | Effluent spray nozzle        | Grab                              | Monthly (1)                            |
| Total Suspended Solids  | Effluent spray nozzle        | Grab                              | Monthly (1)                            |
| Escherichia coli  | Effluent spray nozzle        | Grab                              | Monthly (1)                            |
| pH  | Effluent spray nozzle        | Grab                              | Monthly (1)                            |
| <b>Note 1:</b> If no spray disposal occurs during the month, no sampling is required. |                              |                                   |  |

On the day that the E. coli grab sample is collected, a daily total chlorine residual sample shall be collected at the same time and location as the E. coli sample. Both shall be collected after the spray system has been operating for a minimum of 30 minutes.

B. Reporting:

The daily and weekly measurements and monthly laboratory sampling results (if spraying takes place at any time during the month) required in Condition E2(A) shall be submitted to the Secretary by the 15th day of the second month following the month of the measurements and sampling. The daily and weekly measurements and monthly monitoring results shall be reported on forms prescribed by the Secretary and shall be signed by the operator and the authorized representative of the permittee.

E3. Miscellaneous:

If the permittee monitors any required parameter set forth in this permit for this treatment and sprayfield system more frequently or at additional locations than is required by this permit, the results of such monitoring shall be included on the monthly monitoring report form.

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years or longer if requested by the Secretary. Records shall include laboratory bench sheets showing exact location, time and composites of sample as well as analytical procedures used, interim results obtained and all calculations supporting the reported test results.

E4. Additional Monitoring Requirements:

No other water quality monitoring of the system is required under this permit. However, the Secretary reserves the right to require monitoring of the system in accordance with Condition A(7) should operation of the system fail to meet the requirements of Sections D(1) and D(4).

**SECTION F "PUBLIC HEALTH PROTECTION"**

This indirect discharge is located within the current Well Head Protection Area for the following water supply source, as designated by the Commissioner of Health in accordance with EPR Chapter 12 Groundwater Protection Rule and Strategy:

Bedrock well serving Lakewood Campground - WSID #8140.

This does not imply that this water supply is adversely affected by this indirect discharge. If future replacement of this system is required, the potential impact on the public water supply should be evaluated.

## **SECTION G "COMPLIANCE REVIEW"**

If the results of any inspection or monitoring indicate that a violation of the effluent limits in Condition D2 or a violation of the Vermont Water Quality Standards, is occurring, or is likely to occur, the Secretary may require the permittee to take appropriate corrective action to eliminate or reduce the possibility of a violation.

The issuance of this permit, ID-9-0192, to Lakewood Campground, Inc. by the Secretary relies upon the data, designs, judgment and other information supplied by the applicant, the applicant's consultants and other experts who have participated in the preparation of the application. The Secretary makes no assurance that this system will meet the performance objectives of the applicant and no warranties or guarantees are given or implied.

## **SECTION H "EFFECTIVE DATE"**

This Indirect Discharge Permit, ID-9-0192, issued to Lakewood Campground, Inc. for the discharge of treated domestic sewage from the Lakewood Campground located in Swanton, Vermont is effective on this \_\_\_\_ day of September 2018.

Emily Boedecker, Commissioner  
Department of Environmental Conservation

By: \_\_\_\_\_**DRAFT**\_\_\_\_\_  
Mary Clark, Program Manager  
Indirect Discharge Program