

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

**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 via the treatment and disposal system approved in this permit and described in Condition B2. **This is a permit renewal.**

A1. Permit Summary:

Expiration Date	December 31, 2022
Type of Waste	Domestic Sewage
Design Flow	29,825 gallons per day
Treatment System	Aerated Lagoons
Disposal System	Sprayfield
Maximum Disposal Limit	203,157 gallons per 7-day period
Drainage Basin	Upper Lake Champlain
Receiving Water	Lake Champlain

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 # & 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 15 th
D5. Notify Secretary of sludge disposal	As specified
D10. 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.

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. However, the permittee should apply for renewal by September 30, 2022 for continued authorization to discharge treated sewage.

A4. Revocation:

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

A5. 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.

A6. Indirect Discharge Rules:

The treatment and disposal system qualifies 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 the maximum discharge volume, identified in Condition D1, is allowed without the written approval of the Secretary.

A7. 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;

A7. Right of the Agency to Inspect (continued):

- 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.

A8. 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.

A9. Minor Modifications to System:

Minor modifications of the approved engineering plans identified in Condition C1 which do not reduce the treatment effectiveness or exceed the disposal capacity of the sprayfield may be approved in writing by the Secretary without a permit amendment. Before making any modifications to the treatment and disposal 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.

A10. Replacement of Failed Disposal System:

In the event the disposal system fails, the permittee shall apply for an Indirect Discharge Permit amendment for a replacement disposal system that meets the requirements of the Indirect Discharge Rules. The engineering plans for the replacement system must be reviewed and approved by the Secretary before any construction occurs.

A11. 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:

The treatment and disposal system 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 Alburgh, Vermont 7.5' quadrangle map at Latitude N 44°56'20" and Longitude W 73°12'45".

B2. Approved Treatment and Disposal System:

This permit approves the operation of a domestic wastewater disposal system serving Lakewood Campground. Sewage from the RV trailer sites, office, restrooms and recreation building shall be pumped to and treated in a two-cell aerated lagoon. A second lagoon shall be used for storage. Each lagoon has a capacity of approximately 780,000 gallons. The treated effluent shall be chlorinated and pumped to the sprayfield disposal area located north of the intersection of Lakewood Drive and Tabor Road for disposal.

The sprayfield consists of two spray zones, the East and West zones, with 13 sprinkler heads on each, for a total of approximately 3.7 acres of wetted area. At a maximum application rate of 2.0 inches over the wetted area of the sprayfield in any 7 consecutive days, the disposal capacity of the sprayfield is 203,157 gallons during any 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 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;

C1. Previous Approvals (continued):

- h. Sheets 11 and 12 of 22, dated March 9, 1977; and
- 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:

- 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 (203,157 gallons) on the wetted area of the fields in any consecutive seven (7) day period.

D1. General Operating Requirements (continued):

- 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:

Parameter	Maximum at Anytime
Spray Disposal Flow	2.0 inches (203,157 gallons) 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;

D3. Annual Inspection, Report and Implementation Schedule:

A. Annual Inspection (continued):

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.

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 compliance with this permit and in a manner that will not pose a risk to public health and safety, or cause contamination of drinking water supplies, groundwater and/or surface water.

D5. Sludge Disposal:

All sludge removed from the treatment and disposal system shall be disposed of at a municipal sewage treatment facility or other facility approved by the Secretary. The permittee shall notify the Secretary in writing of the name and address of the pumper and the municipal sewage treatment facility or other facility approved by the Secretary where the sludge was disposed.

D6. Reporting of Failures:

The permittee shall immediately report any failure of the wastewater collection, treatment, storage 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. A failed system is a system that is functioning in a manner (1) that allows wastewater to be exposed to the open air after being discharged, pool on the surface of the ground, discharge directly to surface water, or back up into a building or structure; (2) that results in a potable water supply being contaminated and rendered not potable; or (3) that presents a threat to human health. The written notice shall include a discussion of the actions taken or to be taken to correct the failure.

D7. 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.

D8. Treatment and Storage Lagoon Freeboard:

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

D9. 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.

D10. Monthly Report:

On a monthly basis when the treatment and disposal 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 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):

Parameter	Measurement Location	Sample or Measurement Type	Sample or Measurement Frequency
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)
Note 1: 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 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 submitted to the Secretary. 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:

The Secretary reserves the right to require additional monitoring of the treatment and disposal system should the operation of the system fail to meet the requirements of Conditions D1 and D4.

SECTION F "SOURCE PROTECTION AREA"

The wastewater disposal system is located within a Source Protection Area for the following water supply source:

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 the wastewater disposal 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 an exceedance of the effluent limits identified 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 a violation or reduce the possibility of a violation.

The issuance of this permit, ID-9-0192, 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 permit, ID-9-0192, is effective on the date of signature.

SECTION I "APPEAL RIGHTS"

This permit may be appealed to the Environmental Division of the Vermont Superior Court within 30 days of the date of this permit.

Emily Boedecker, Commissioner
Department of Environmental Conservation

By: Mary K Clark
Mary Clark, Program Manager
Indirect Discharge Program

Date: September 19, 2018