



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 3, 2009

RE: COLUMBIANA COUNTY
WEST TOWNSHIP
PARADISE LAKE PARK
6940 ROCHESTER ROAD
NPDES PERMIT NO. 3PR00325

Mike and Sue Bachman
7342 South Long Lake Road
Siren WI, 54872

Dear Mr. & Mrs. Bachman:

A review of the proposed park that you propose to purchase was conducted by this writer on December 10, 2009. The site encompasses a 155-acre tract of land located on the east side of Rochester Road, at the above address, just north of State Route 172. The property is presently a campground and mobile home park.

We understand you propose to purchase the campground and mobile home park and maintain the current operations. The only change would be the conversion of the mobile park into additional recreational vehicle sites. The facility currently includes 240 recreational vehicle sites with full water services, a 25 space mobile home park, two residential homes, laundry facilities, dry goods store, concession stand, dump station, and shower building. The current operations for the recreational vehicle park utilize a septic tank hauler to empty grey water tanks installed at each camp site, then a tab is pulled and the black water tank empties into the grey water tank and that wastewater is removed by the septic tank hauler. The septic tank hauler has been land applying the material on farm fields. Please be advised that this is not permitted by Ohio EPA or the Ohio Department of Health. The waste removed from the tanks must be disposed at a permitted municipal wastewater treatment plant. Based upon the above proposal and our recommended design criteria of 90 gpd per campsite, 300 gpd per mobile home site, 20 gpd per employee and 360 gpd per residential home, it is estimated that approximately 30,000 gpd of wastewater would be generated.

When evaluating the property for a new treatment system for a proposal such as yours, primary consideration is given to the adequacy of the existing system, the availability of a satisfactory receiving stream for an effluent discharge, the adequacy of downstream isolation, and how the proposed treatment system fits into the general plan of sanitary sewers for the area.

A review of the existing system consists of a trash trap, followed by a 20,000 gpd extended aeration treatment plant, dosing chamber, surface sand filter, and chlorination facilities. Discharge from the chlorine contact tank is pumped to a pond just below the dam for Paradise Lake. The system has a marginal compliance record with occasional violations. A review of the adequacy of this system revealed that the original 80 sites



Mike and Sue Bachman
Paradise Lake Park
March 3, 2009
Page 2

for this facility were never connected to the wastewater treatment plant. The original approval for the park was in May of 1972 and the plant was designed for 80 trailer lots, a small dry goods store and a shower building. A second phase of 115 future trailer lots was mentioned but the treatment plant would have needed to be expanded. The current park far exceeds these numbers; however, no recreational vehicle trailer lots have been connected. Currently the only facilities connected to the treatment plant are two residential homes, the park dump station, shower building and dry goods store. The park also has two unknown on-site systems at the rear of the park serving C hill and D hill. These systems consist of a septic tank followed by some unknown system but are pumped regularly along with grey water tanks. As mentioned above each trailer site is served by its own grey water tank.

The existing facility has a current NPDES permit (3PR00325). This facility discharges to an unnamed tributary of the Mahoning River. The compliance record of this facility, as stated above, is marginal. Current practices have most of the wastewater being hauled off site since none of the recreational sites are connected to this plant.

The review disclosed that there are no sanitary sewers planned for this area at this time. It is not likely that a central sewer system will ever be available to this property.

The following are findings from the inspection.

1. The trash trap was inspected and appeared satisfactory.
2. The aeration tank was a brown color. The normal color is a dark chocolate brown color. The walls around the plant have been repaired. A positive means of directing surface drainage away from the plant should be provided to prevent plant flooding.
3. The settling tank was producing an effluent relatively free of pin floc. The effluent weirs needed cleaned.
4. One of the surface sand filters was plugged and the other had been cleaned. This is typical for this time of the year. The solids inventory of the system must be maintained to prevent the solids from passing over to the sand filters. The aerated sludge holding tank that the new permit requires will assist the plant operator with this.
5. The plant's effluent viewed in the inspection port appeared free of solids. There were no visible problems noted in the pond receiving the discharge or the receiving stream of the pond.
6. A review of the monthly operating reports for the period of October 2007 through February 2008 revealed several discharge violations. Monitoring for Dissolved

Oxygen, Suspended Solids, and Ammonia indicate violations during the period reviewed. Violations of permit effluent limits are considered a violation of Ohio Revised Code 6111.07 AND are subject to enforcement action per Ohio Revised Code 6111.99. Due to computer problems at the laboratory being utilized by the park no data was available after February 2008. The problem is currently being corrected by the laboratory and plant operator.

7. The treatment plant does not have an aerated sludge holding tank. A sludge holding tank would enable you to waste sludge from the treatment system on a regular basis and prevent solids from by-passing to the sand filters. Along with the flow equalization tank the current NPDES permit has a schedule for the installation of a sludge holding tank. These two units will improve plant operations and allow for continued compliance with the NPDES permit. The current NPDES permit requires the submission of detail plans by March 2009 for these two units.

Water will be supplied from a private well on the property. Approval will also be contingent upon the development of a safe and adequate water supply. Please contact Ms. Cindy Petretich of this office concerning all necessary requirements regarding approval of the existing water supply.

Based on our design criteria and the current NPDES permit, the following actions items must be completed by the current owner or the prospective buyers:

- A. The existing wastewater treatment plant was designed for 20,000 gpd. This should provide capacity for the original 80 recreational vehicle sites, 25 mobile home sites, two residential homes, employees, shower facility, dry goods store, and park dump station. The remaining 160 recreational vehicle sites will have to be dealt with on a performance basis. Since this waste material is being hauled off site currently it should not be a problem. This waste material must be disposed of at an NPDES permitted wastewater treatment plant. When the aerated flow equalization tank is installed this material could be disposed here provided it does not create NPDES permit violations.
- B. This summer the two on-site treatment systems on the far side of the lake must be evaluated while the park is in operation. Dye testing of these systems will reveal any unauthorized discharges or failures at that time. Any corrective actions documented at that time will be addressed then.
- C. All connections between the sewage tanks (black water) of the recreational vehicles and the grey water tanks must be removed. The local Health Department will inspect these during their annual inspection. 3701-26-15(A)(1) of the Ohio Administrative Code states that "Gray water disposal facilities shall be located so that no park or camp site is farther than two hundred feet in

walking distance and there shall be no more than one facility for every twelve sites. ...". This park is currently not in compliance with this code. Please be advised that this issue would be a decision of the state or local health department. Furthermore, any replacement of these tanks must be approved by the state or local health department for both design and construction material so they comply with the above referenced rule. The individual tanks of each site would not comply with the Ohio EPA policy for holding tanks; therefore, this Agency would not approve them.

- D. The NPDES permit requires the installation of an aerated flow equalization tank and aerated sludge holding tank. Detail plans are due in March 2009, start of construction by March 2010, and be operational by September 2010. Since the current owner has reduced the sale price of the park by the cost of this equipment, this office does not see a reason the current schedule could not be met. The money has been provided for the equipment. Another option would be to allow the current owner to install the equipment prior to turning over ownership to the prospective buyers. The new flow equalization tank should be installed off line with remaining treatment components so that the tank could be used by the septic tank hauler who is emptying the tanks in the park. The tank should be set up to discharge throughout the week when flow is lower and the plant can more readily accept it. Special care must be taken that no chemicals that would harm the treatment plant are utilized by the recreational trailer sites.
- E. The original 80 trailer sites have never been connected to the treatment plant as required by the May 1972 permit; therefore the 80 sites must have sanitary sewer lines installed by February 13, 2013. This will allow the future or current owner almost four years to complete construction. A positive means of flow metering at the plant must be provided to ensure it is not overloaded and resulting in NPDES permit violations. Based on these flow values the owner will be able to determine if the septic hauler can dump the wastewater from the other 160 sites here or have it trucked off site to an appropriate facility.
- F. In the past the septic tank hauler has been land applying the material on farm fields. Please be advised that this is not permitted by Ohio EPA or the Ohio Department of Health. The waste removed from the tanks must be disposed at a permitted municipal wastewater treatment plant.
- G. A permit transfer form must be submitted 30 day prior to completion of the sale. A permit modification must be submitted by the day of the sale that will request an addition to the NPDES permit schedule for construction of the sanitary sewers. The permit modification must be accompanied by a check for \$200 made payable to the treasure of the State of Ohio.

Mike and Sue Bachman
Paradise Lake Park
March 3, 2009
Page 5

Four sets of detailed plans of the sewage treatment system must be prepared and stamped by a Professional Engineer and submitted to this office. They will be forwarded to the Director's Office with our recommendations. The Professional Engineer preparing the plans shall also be responsible for overseeing the installation of the system. Your contract with the engineer must include inspection during construction. In accordance with the Ohio Revised Code Section 6111.44, you must receive formal approval from the Director's Office prior to construction.

All fees, applications, and data sheets must be completed and included with the submission of detail plans before the plans can be processed for approval.

Design criteria, guidelines, and laws are continually being reviewed. For this reason, the requirements and site approval noted in this letter is valid for one year from the date of this letter.

Should you have any comments or questions regarding this letter, please contact this office.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

cc: Lori J. Barnes, R.S., Columbiana County Health Department
Don King, Paradise Lake Park

ec: Virginia Wilson, P.E., Ohio EPA, DSW, NEDO
Rick Blasick, P.E., Ohio EPA, DSW, NEDO
Cindy Petretich, Ohio EPA, DDAGW, NEDO
Leeann Hoon, Ohio Department of Health
Caroline Markworth, Ohio EPA, PIC

File: Semipublic/Columbiana County/West Township/Paradise Lake Campground