

**Environmental
Protection Agency**

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

April 12, 2011

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

Mike and Sue Bachman
6940 Rochester Road
East Rochester, OH 44625

Dear Mr. and Mrs. Bachman:

On February 25, 2011, this office received detail plans for the upgrade of the wastewater treatment facilities for the above referenced camp ground. On November 9, 2010, this writer conducted an inspection of the wastewater treatment plant for the Paradise Lake Park. The intent of the inspection was to evaluate operations and maintenance of the system for the transfer of the existing permit. The following are findings from the inspection.

Wastewater Treatment Plant

1. The trash trap was not inspected.
2. The aeration tank had a good brown color. The skimmers and sludge returns were operational.
3. The settling tank was producing an effluent relatively free of pin floc.
4. The sand filters were relatively clean with some minor solids and weeds. When any sludge or solids are removed from the sand filters, it needs to be placed in a dumpster and disposed at a licensed solid waste landfill.
5. The chlorine contact tank appeared to be operating satisfactorily.
6. A review of the monthly operating reports for the period of October 2007 through February 2011 revealed several discharge violations. The violations for this time period are attached to this letter. It must also be noted that no Monthly Operating Report data was available for the period of December 2007 through September 2009. If this data is available, it must be entered into your electronic data base. 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.

7. Detail plans for the installation of the aerated sludge holding tank and the flow equalization were submitted in February of 2011. This is also a full two years behind schedule. Construction is projected to be completed by June 2011 which will be roughly eleven months behind schedule. This office has reviewed the plans and provided comments to your engineer. This schedule of compliance must be completed quickly to mitigate any potential future enforcement. These two units will improve plant operations and allow for continued compliance with the NPDES permit.

Campground Design and Future use

At the inspection, we had a discussion of the current and future use of the park. At that time, you were proposing eliminating the mobile home park on the north side of the campground and turning them into recreational vehicle sites. Furthermore, you asked if the existing mobile homes could be removed and utilize individual home septic systems. The current wastewater treatment plant was designed for 20,000 gpd. Our current design criteria is 300 gpd per mobile home, 360 gpd per residential home, 60 gpd per unsewered recreational vehicle site, and 90 gpd per sewerred recreational vehicle site. Your future proposal would include the residential home, two mobile homes south of the plant, and the rest recreational vehicle sites along with the existing general store and maintenance building. The area north of the treatment plant that was approved for a mobile home park with existing sanitary sewers would be converted to additional recreational vehicle sites. The two existing mobile homes in this area would be disconnected from the existing treatment plant and individual home systems would be installed.

This office would not object to the two mobile homes being disconnected from the existing system provided the Columbiana County Health Department agrees to it and oversees the instillation of home systems. Each home must have a lot of sufficient size for a water well, septic system with replacement tile field, and the appropriate isolation distances from the property lines, occupied buildings, etc.

The existing home and mobile homes south of the plant would account for roughly 1000 gpd of the existing treatment plant design capacity. That would leave approximately enough design capacity for approximately 317 sites without sewers and 211 if sewers are provided. (How you decide to divide the flow is irrelevant with the bottom line being compliance with your NPDES permit.) The current park is permitted a design flow of 20,000 gpd with its associated loadings. Any new or additional loadings to the existing point of discharge would require the facility to go through an anti-degradation review.

There are several on-site systems on the site that serve bathhouses and restrooms. These facilities are as follows:

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- 1) The Beach Shower House: Restroom and showers followed by a tank to some unknown system.
- 2) C Hill: Restrooms only and is served by a tank under the building to some unknown system.
- 3) D Hill: Restrooms only and is served by a tank under the building to some unknown system.
- 4) Green Shower House: Restroom and showers followed by a tank to a tile field of unknown size.
- 5) Brown Shower House: Restroom and showers served by a tank under the building to some unknown system.

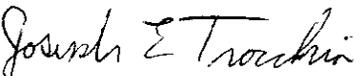
At the time of the inspection, there were no visible signs of any of these systems failing. This office is willing to allow the use of these systems on a performance basis provided there is no discharge or signs of failure. This summer, this office will dye test these systems to confirm there is no discharge. If at any time these facilities demonstrate signs of failure or a discharge to waters of the state of Ohio, they must be connected to the existing wastewater treatment plant.

The final issue for this facility would be connecting all sites within the park to the existing wastewater treatment plant. When the facility requested the installation of the package plant, it was to include the new mobile home park and campground. You must develop a long range plan for the installation sewers throughout the park. This will be necessary immediately, if one of the on-site systems above fails. You must provide a date specific schedule to address the installation of camp-wide sewers. This project could be done in phases to minimize the capital costs.

By April 29, 2011, please respond in writing what your proposed course of action will be to correct the above deficiencies. The letter needs to include a timeframe to complete the above listed modifications to the wastewater treatment plant.

You may contact this office at (330) 963-1193 to discuss any questions you may have.

Respectfully,


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

JET:bo

cc: Lori J. Barnes, Columbiana County Health Dept.

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