

**Environmental  
Protection Agency**

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

May 3, 2011

RE: STARK COUNTY  
MARLBORO TOWNSHIP  
CUTTY'S SUNSET CAMPING  
8050 EDISON STREET  
NPDES #3PR00373\*CD

Mr. Randy Markum, Manager  
Cutty's Sunset Camping Resort  
8050 Edison Street  
Louisville, OH 44641

Dear Mr. Markum:

On April 20, 2011 this writer conducted a compliance evaluation inspection of the wastewater treatment facilities located 8050 Edison Street, Marlboro Twp., Stark County. You accompanied me during the visit. The following is a summary of the inspection:

**General**

The wastewater treatment facilities were designed to treat 20,000 gpd and approved in 1998. The plant consists of a 2500 gallon trash trap, 8800 gallon flow equalization tank, followed by a 20,000 gallon extended aeration plant, a 1683 gallon dosing chamber, a 1667 square foot surface sand filter equally divided into two beds, a 3366 gallon chlorine contact tank with dechlorination, and 4800 gallon aerated sludge holding tank. The treatment works were also approved for the conversion of an existing swimming area into a manmade wetland.

**Observations**

- 1) The park had not been opened for the upcoming season; therefore the only sanitary flow would be from the office and the maintenance garage.
- 2) Flow into the dosing chamber was estimated to be approximately 50 gpm. The recent rains were thought to be a majority of this flow, which indicates that the collection system has a problem with infiltration.
- 3) Flow is monitored at the dosing chamber by the use of pump timers. A reading is taken on Sunday to Sunday. The flow calculated is then averaged over the week and this flow figure is then used as a daily flow when reporting on the e-DMR.
- 4) Effluent sampling for the permit is done at the exit location for the historic swimming area. You explained that a sample was taken whether or not water was flowing into the exit pipe or not. At the time of the inspection the water level was high enough to submerge this outlet.
- 5) The surface sand filter being used was flooded due to the excessive flow.
- 6) The swimming area was never converted to a wetland.

**Permitting issues**

- 1) Infiltration into the system is being addressed as sites are upgraded or problems arise. A record of the work performed should be kept. An effort should be made on a yearly basis to address this issue.

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- 2) As we discussed, the effluent monitoring point must be moved to the roadside ditch inside the concrete vault. The current location described above is not an appropriate location. This includes flow monitoring.
- 3) Flow must not be averaged over the week and used as a daily flow. Flow must be measured on the actual day of sampling. We discussed a couple of methods that are acceptable. We suggest that you use a bucket and stopwatch method, unless you wish to install an inline flow meter at the final discharge to the ditch.
- 4) If there is no flow from the pond for the sampling frequencies listed in the permit, then you are not required to sample. For example, if you report no flow and no sample taken for a 1/month frequency parameter (e.g. CBOD) then you state that for every day during the month there was no flow to the ditch. This will require that you observe the discharge to the ditch on a daily basis in order to make this statement.
- 5) Upon reviewing the file it has been learned that the pond was supposed to be a constructed wetland as per the approved Permit to Install issued on April 7, 1998. It is obvious that the wetland was never installed or it has disappeared. Please provide a written explanation as to why the wetland is not present.

A review of your self-monitoring reports covering the period August 2007 through March 2011 revealed the following effluent violations:

**Numeric Violation**

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Total Suspended Solids	30D Conc	12	21.9	5/1/2008

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1136 or by e-mail at [phil.rhodes@epa.state.oh.us](mailto:phil.rhodes@epa.state.oh.us)

Sincerely,



Philip P. Rhodes, P.E.  
Environmental Specialist II  
Division of Surface Water

PPR/mt

cc: Todd Ascani, Stark County Health Department

File: Semi-Public/Cutty's Sunset Camping Resort