



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PV0011820080102

CHAMPAIGN A&R RECK SUNSET TERRACE MHP

MILLER, JOSEPH

2008/01/02

CERTIFIED MAIL™ RECEIPT
(Domestic Mail) (No Insurance Coverage Provided)

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OFFICIAL USE

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Total Postage & Fees	\$

See A&R Reck, Miami for violations list
Postmark Here

Sent To Alex Reck
 Street, Apt. No., or PO Box No. 5385 Croft Mill Rd.
 City, State, ZIP+4 Bradford, OH 45308

PS Form 3800, June 2002 See Reverse for Instructions

9490 7447 2000 0500 0000 7000



State of Ohio Environment:

Southwest Dis:

TELE: (937) 285-6357 FAX: www.epa.state

401 E. Fifth St.
Dayton, Ohio 45402

January 2, 2008

Alex Reck
5385 Croft Mill Road
Bradford, OH 45308

RE: **NOTICE OF VIOLATION, FAILURE TO COMPLY WITH NPDES PERMITS**
*A&R Reck Mobile Home Park, 1PY00003*AD/OH0133809, Miami County*
*Hidden Valley Mobile Home Park, 1PV00037*AD/OH0040657, Shelby County*
*A&R Reck Sunset Terrace 1PV00118*AD/OH0132098, Champaign County*

Dear Mr. Reck,

Ohio EPA has reviewed your monthly operating reports for the above referenced facilities. Our review indicates numerous violations of your NPDES permits. The specific instances of noncompliance are attached. Also, each mobile home park's compliance status is discussed briefly below. With the exception of the Miami County A&R Reck MHP, all violations listed are AFTER wastewater treatment plant upgrades were installed.

A&R Reck MHP, 1PY00003*AD/OH0133809, Miami County

A wastewater treatment plant upgrade was installed in summer 2007, over a year beyond the May 1, 2006 compliance date. The permittee has not submitted written verification to the Southwest District Office within 14 days of completion of schedule of compliance milestones. A final inspection of wastewater plant improvements as per permit to install 05-13650 has not been scheduled. The wastewater plant continues to discharge in violation of NPDES permit effluent limitations. Excessive frequency violations (failure to monitor) were noted during the period evaluated (January 2006 to November 2007). The local health department has received complaints regarding wastewater treatment at this mobile home park.

Hidden Valley MHP, 1PV00037*AD/OH0040657, Shelby County

A wastewater treatment plant upgrade was installed in February 2006, beyond the June 1, 2005 compliance date. The wastewater plant continues to discharge in violation of NPDES permit effluent limitations. All effluent limit and frequency violations listed are following the wastewater treatment plant installation. The local health department has received complaints regarding wastewater treatment at this mobile home park.



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A&R Reck Sunset Terrace MHP, 1PV00118*AD/OH0132098, Champaign County

A wastewater treatment plant upgrade was installed in January 2006, beyond the September 1, 2005 compliance date. The wastewater plant continues to discharge in violation of the NPDES permit effluent limitations. All effluent limit and frequency violations listed are following the wastewater treatment plant installation. The local health department has received complaints regarding wastewater treatment at this mobile home park.

The continued non-compliance by your upgraded wastewater treatment plants is inexcusable. Continued effluent limit and frequency violations on improved facilities would seem to be due to inadequate operator oversight or improperly designed treatment components. In order to determine what factors (operations and maintenance vs. system design limits) are impacting the treatment systems, a complete system performance evaluation will need to be performed by a Professional Engineer. This evaluation should include a unit by unit evaluation as to treatment design capacity (design flows and loadings, both average and peak) vs. actual flows and loadings. For those units that are operating within design limits, specific operation and maintenance practices will need to be developed/revised as needed. An updated operation and maintenance manual will need to be developed for the plant. This review has previously been requested in some form for both the Hidden Valley MHP and the A&R Sunset Terrace MHP.

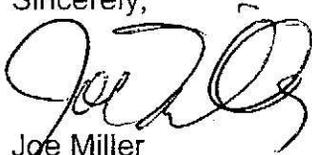
Frequency of operator oversight needs to comply with Ohio Administrative Code 3745-7 (effective December 21, 2006). Provide a copy of the operator contract and the expected frequency of site visits.

Provide a response to this Notice of Violation by **January 18, 2008**. Your response should include the following:

- 1. Contact information for the third party engineer contracted to evaluate the wastewater facilities as described.**
- 2. A copy of the contract with your operator detailing the frequency and length of site visits to operate the wastewater facilities.**
- 3. Explanations for effluent limitation and frequency violations.**

Should you have any questions, I can be reached at (937) 285-6109.

Sincerely,



Joe Miller

Division of Surface Water

CC: Johnny Shingleton, Wastewater Operator
Champaign County Health Department
Miami County Health Department
Shelby County Health Department



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