



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8488  
www.epa.state.oh.us

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

Re: **Notice of Violation**  
Hardin County  
Hillcrest Estates MHP  
NPDES Permit

November 19, 2008

Mr. Steven Ureel, President  
4 MHC Associates, L.P.  
1120 North Main Street  
Rochester, Michigan 48307

Dear Mr. Ureel:

On October 30, 2008, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted on the wastewater treatment system at the Hillcrest Estates Mobile Home Park. The facility is located at 4599 State Route 235, Liberty Township, Hardin County. Mr. Phil Epley was present and provided information on plant operation and maintenance.

During our visit, the plant was in operation. The aeration tank had adequate mixing with a dark brown color. However, some floating solids were present in the clarifier and in the effluent weir. No samples were collected to verify compliance with permit limits.

Our review of your discharge monitoring reports indicates that fecal coliform levels have been reported as "AK" (too numerous to count) during the past six reporting periods. In our previous inspection letters dated August 17, 2007 and July 22, 2005, we informed you that "Fecal coliform limits are violated on a regular basis. In order to bring the facility into compliance with NPDES permit limits, it will be necessary to install chlorination/dechlorination facilities." We put a schedule of compliance in your NPDES permit requiring a general plan for disinfection facilities to meet final effluent limits no later than one year from the effective date of the permit. Your general plan indicated that chlorination/dechlorination facilities would be installed and be operational by May 1, 2007. A permit to install was issued for installation of the disinfection equipment on February 15, 2007 and expired on August 15, 2008. To date, this equipment has not been installed.

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In a memorandum dated January 10, 2008, you informed us that you were working with the Village of Ada and the Hardin County Commissioners to extend the Ada sanitary sewer to serve your site as well as the ONU warehouse and adjacent property owners. To date, no timeframe has been established for this project, no apparent progress toward connection has been made and effluent violations continue to be reported.

**4 MHC Associates, L.P. remains in Significant Non-Compliance with the requirements outlined in your NPDES permit, suggesting to us that escalated enforcement action including a civil penalty is warranted.** Please inform this office within 10 days as to the reasons for these violations, as well as a description of the actions taken or proposed to prevent any further violations. Your letter must include the dates, either actual or proposed, for completion of the actions. If these violations continue to occur and if satisfactory progress is not made, we will have no choice but to initiate enforcement action to achieve compliance.

Operator Certification rules outlined in Ohio Administrative Code (OAC) 3745-7 became effective on December 21, 2006. Record keeping requirements and responsibilities of a certified operator (OAC 3745-7-09) were effective at that time. Portions of these record keeping requirements require documentation of all operation and maintenance activities on the collection system and wastewater treatment plant to be developed and maintained. The required documentation includes, but is not limited to: dates and times of arrival and departure for the operator of record and preventative maintenance logs for all plant and collection system components. The records must be kept up to date, contain a minimum of three months data at all times, and be maintained on site for at least three years. **These record keeping requirements must be implemented immediately.**

A copy of our completed inspection report is enclosed for your records. If you have any questions, please call me at (419)373-3008.

Sincerely,



Thomas Poffenbarger, P.E.  
District Engineer  
Division of Surface Water

/csl

pc: Mr. Phil Epley, Operator  
\\DSW-NWDO File

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION  
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2P400039

Facility Name Hillcrest Estates Mobile Home Park Expiration Date 2/28/2011

Facility Address 4599 State Route 235 Date 10/30/08 Time 10:55 am / pm

City \_\_\_\_\_ County Hardin Township Liberty

Name and Address of Owner 4MHC Associates, LP, 1120 N. Main St, Rochester, MI 48307

Person Contacted Mr. Steven Dreef, President Owner Phone 248-601-8400 ex 22

Flow: Design 6000 GPD Present \_\_\_\_\_ GPD (metered - estimated)

Trib. Pop. \_\_\_\_\_ (actual - estimated) Weather at time of inspection: Temp \_\_\_\_\_ °

OEPA Personnel Thomas Poffenbarger, PE. District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear	X	None		Colorless
1	Mild	X				X	
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: Not Observed

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has \_\_\_\_\_ excellent \_\_\_\_\_ good X fair \_\_\_\_\_ poor operation  
 b. Plant has \_\_\_\_\_ excellent \_\_\_\_\_ good X fair \_\_\_\_\_ poor maintenance  
 c. Sand filters have \_\_\_\_\_ excellent \_\_\_\_\_ good \_\_\_\_\_ fair \_\_\_\_\_ poor maintenance

d. Not operating at expected efficiency due to:

- (1) \_\_\_\_\_ hydraulic overload  
 (2) \_\_\_\_\_ organic/ solids overload  
 (3) \_\_\_\_\_ personnel inefficiency  
 (4) \_\_\_\_\_ equipment failure  
 (5) \_\_\_\_\_ wastes  
 (6) \_\_\_\_\_

Disinfection: (Required May 1 thru Oct.31.)	
IN	OUT <u>NONE</u>
_____	_____ Chlorination Tablets
_____	_____ Dechlorination Tablets
_____	_____ U.V.

Yes No

4. X Compliance with NPDES Permit

Periodic Violations X Y N \_\_\_\_\_ Parameters: Ammonia  
 Chronic Violations X \_\_\_\_\_ Fecal Coliform

5. X Adequate plant safety

6. X Operation and Maintenance Service Name Phil Epley

Frequency of Visits 1/week

Facility Name: Hillcrest Estates

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency: <u>1/Year</u>
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment	1	Plant Timer <u>X</u> <u>Y</u> <u>N</u>	Cycle Time: <u>Morning 15/30 minutes</u>
		Motor/ Blower Unit	<u>other Times 15/60 minutes</u>
Secondary Treatment	1	Aeration Tank	Color: <u>Dark Brown</u> Adequate Aeration: <u>Y</u> <u>X</u> <u>N</u>
Final Settling	1	Clarifier	<u>Turbid</u>
	1	Sludge Return	In <u>X</u> Out <u>Dark Brown</u>
	1	Surface Skimmer	In <u>X</u> Out
		Fixed Media Clarifier	
Tertiary Treatment		Surface Sand Filter	
		Polishing Pond	
		Other	
Disinfection		Contact Tank	
		Chlorine Tube Feeder	
		Dechlorination Tube Feeder	
		Ultraviolet (UV)	
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling		Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal		Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment		Post Aeration	
		Spray Irrigation	
		Other	