



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

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

January 28, 2010

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

Dear Mr. Ureel:

On January 20, 2010, 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. Floating solids were present in the clarifier. The discharge was clear. However, 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 eight reporting periods. In our previous inspection letters dated November 19, 2008, 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 (PTI) 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.**

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. In a memorandum documenting our telephone conversation on December 23, 2008, we allowed you until the end of February 2009, to obtain a written commitment from the Hardin County Commissioners to initiate a sewer project to serve the facility, to submit a

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PTI showing a private connection to the Village sewer system, or submit a new PTI showing construction of disinfection equipment. **No written commitment was received from the Hardin County Commissioners and no PTI was received for connection to the Village sewer or disinfection equipment.**

In an e-mail message dated April 13, 2009, from Mr. Rob Pryber, it was stated that "Engineering plans are approximately 50% completed" to connect to the Village sewer system and that talks with the Village regarding connection were continuing. **No communication, PTI application, or apparent progress toward connection has been made since that time. Effluent violations continue to be reported.**

At this point, it is evident that escalated enforcement action, including a civil penalty, is warranted and will be initiated unless a fixed date schedule for connection to the Village sewer is submitted within 14 days. The schedule, which must be adhered to, must include a date for submittal of the PTI application and approvable detail plans, a date for initiation of construction of the connection, and a date for completion of construction/elimination of the discharge of the wastewater treatment plant.

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

/lb

Enclosure

pc: Mr. Phil Epley, Operator w/enclosure

~~DSW-NWDO-File~~

OHIO ENVIRONMENTAL PROTECTION AGENCY
 OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PY00039

Facility Name Hillcrest Estates MHP Expiration Date 2/28/2011

Facility Address 4599 State Route 235 Date 1/20/10 Time 10:35am / pm

City _____ County Hardin Township Liberty

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

Person Contacted Phil Epley Owner Phone 248-601-8400 Ext 22

Flow: Design 6000 GPD Present 4100 GPD (metered estimated)

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 30° Sunny

OEPA Personnel Thomas Poffenbarger, PE. District NWDO

1. Plant Effluent - Mark Severity No.

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

2. Effect of effluent on Receiving Stream Name: Unnamed trib. to Grass Run Creek

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 X good _____ fair _____ poor operation
 b. Plant has _____ excellent X good _____ 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
_____	NO DISINFECTION
_____	Chlorination Tablets
_____	Dechlorination Tablets
_____	U.V.

Yes No

4. X _____ Compliance with NPDES Permit

Periodic Violations X Y N Parameters: Suspended Solids

Chronic Violations X Y N Parameters: Fecal Coliform, Ammonia, CBOD

5. X _____ Adequate plant safety

6. X _____ Operation and Maintenance Service Name Phil Epley

Frequency of Visits Once per week

Facility Name: Hillcrest Estates MHP

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency: <u>Twice Per 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>30 minutes on / 30 minutes off</u>
		Motor/ Blower Unit	
Secondary Treatment	1	Aeration Tank	Color: <u>Dark Brown</u> Adequate Aeration: <u>Y</u> <u>N</u>
Final Settling	1	Clarifier	<u>clear effluent</u> <u>Floating Solids on Surface</u>
		Sludge Return	In <u>X</u> Out
		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	