



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

November 15, 2011

RE: WHISPERING WILLOW MOBILE HOME PARK  
OHIO EPA PERMIT NO. 3PV00084  
AUSTINBURG TWP, ASHTABULA COUNTY

**NOTICE OF VIOLATION**

Mr. Steve Ureel, General Partner  
4 MHC Associates Limited Partnership  
Whispering Willow Mobile Home Community  
1120 North Main Street  
Rochester, MI 48307

Dear Mr. Ureel:

On November 1, 2011, a limited scope site records inspection was conducted at the above referenced facility at 4250 State Route 307. The inspection was conducted by John Schmidt of this office, and maintenance worker represented 4 MHC Associates Limited Partnership (4MHC), d.b.a. Whispering Willow Mobile Home Community. The purpose of the inspection was to evaluate the facility's operations and maintenance records with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and Ohio Administrative Code (OAC) Rule 3745-7-09 for the time period of September 4, 2011, through September 17, 2011. Previous inspections have identified Marlene Knopsnider as the Operator of Record (ORC) that regularly visits this facility.

The inspection revealed that all records required pursuant to OAC 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. Examination of the log book revealed that although the Wastewater Treatment Plant (WWTP) was inspected at the minimum frequency during the inspection period, ending times and inspection details are not provided. The records must be accessible onsite for 24-hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A)(2). The facility Owner and Operator are both responsible to make sure that the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. The log must include inspection dates with time in and time out, clearly identify who is logging time at the facility, and list all activities being performed during the visit. In addition to the log book, a copy of the contract with your ORC must be maintained at the site. You and your ORC must also submit a new ORC notification form to Ohio EPA's Operator Certification Unit as indicated on the form which must include all ORCs who inspect this facility. As a courtesy, please provide a copy of the revised ORC form to this office for our records.

Based upon a lack of a log book to document visits by your ORC, 4MHC is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, OAC 3745-7-09 for not maintaining all the required information in the log book, and OAC 3745-33 for not meeting permit conditions.

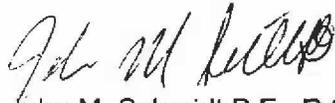
***Please inform this office, in writing, within 14 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or***

WHISPERING WILLOW MOBILE HOME PARK  
NOVEMBER 15, 2011  
PAGE 2 OF 2

***explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.***

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

Cc: Daniel Kopec, Ohio EPA, DSW, CO  
Dustin Lewis, Lewis Wastewater Management

File: SP/Ashtabula/Harpersfield Twp./Whispering Willow MHP (3PV00084)