



### REGION 3

PHILADELPHIA, PA 19103

#### **VIA ELECTRONIC SERVICE**

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**Re: Administrative Order on Consent - Docket No. CWA-03-2024-0044DN**

Dear Messrs. Byrum and Blaine:

Attached is the executed Administrative Order on Consent (“AOC”) concerning violations of the Clean Water Act (“CWA”), as amended, 33 U.S.C. § 1251, *et seq.* The United States Environmental Protection Agency (the “EPA”) is issuing this AOC to Hill Mobile Home Park, LLC (“Hill” or “Respondent”) under the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), for alleged violations at the Hill Mobile Home Park Sewage Treatment Plant (“STP”), located at the intersection of Lakewood Road and A.P. Hill Boulevard, Bowling Green, Virginia 22427.

Specifically, the Order in the AOC requires Hill to:

1. Continue pump and haul services for the STP’s effluent, which it began on April 6, 2023. There will be no further discharge from the STP.
2. Within ninety (90) days of the Effective Date of the AOC, the Respondent shall provide to EPA for review and approval a Corrective Action Plan (“CAP”), which meets the requirements set forth in the AOC. The CAP shall include, at a minimum, plans and a schedule for implementing corrective actions to address the following to return to compliance with the CWA:
  - a. A plan and schedule for the construction of a new STP facility.
  - b. A plan and schedule for removal and closure of the current wastewater treatment

facility as required in the closure requirements in Part 1. Section C.11 of the STP Permit.

- c. A plan and schedule for implementation of proper operation and maintenance of the new STP including updated O&M manual and demonstration of compliance with Permit Part II Section Q.
- d. A report of infiltration and inflow (“I&I”) work on the collection system in the Hill Mobile Home Park completed prior to submission of the CAP and a plan and schedule for implementation of further I&I work, if necessary for the operability of the new STP.
- e. All work should be completed in compliance with Respondent’s current NPDES permit, including revision of the current NPDES permit following completion of the new STP.

Notwithstanding the foregoing, in the event that Respondent determines that the replacement plant is infeasible, either due to cost estimates, including fines or penalties resulting from any noncompliance with the Permit or the CWA, exceeding budget or other unforeseen contingencies, the CAP may simply call for ceasing all operations at the Hill Mobile Home Park. In the event that Respondent ceases all operations at the Hill Mobile Home Park, the AOC shall be deemed completed.

**Under the AOC, Hill must submit a notice within thirty (30) days once all work as identified and required in the CAP, if applicable, has been completed, in accordance with Paragraph 47 of the AOC. In addition, no later than sixty (60) days from the Effective Date of the AOC, Hill must submit to EPA for review a list of deadlines included in the AOC, in accordance with Paragraph 48 of the AOC. All submittals must be accompanied by a certification in accordance with Paragraph 49 of the AOC.**

Please note that the Effective Date of this AOC is today, the date of your receipt of this document. If you have any questions regarding the AOC, please contact Rebecca Serfass at (215) 814-2047 or contact Daniel T. Gallo, the attorney assigned to this matter, at (215) 814-2091 or [gallo.dan@epa.gov](mailto:gallo.dan@epa.gov).

Sincerely,

Karen Melvin  
Director  
Enforcement & Compliance Assurance Division

Enclosure

cc: Rebecca Serfass, Sr. Inspector/Enforcement Officer, EPA-Region (3ED22)  
Daniel T. Gallo, Sr. Assistant Regional Counsel (3RC40)  
Kristen Sadtler, Water Enforcement Coordinator & Adjudication Officer  
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