

October 26, 2011

Mr. John Morales, Water Resources Control Engineer  
California Regional Water Control Board, Lahontan Region  
14440 Civic Drive, Suite 200  
Victorville, CA. 92392

**WDID:** 6B361105001

**Re: Supplementary Report to Notice of Violation - Deficient Report Complaint To A Notice of Violation Regarding An Unauthorized Discharge, Hometown America's Los Ranchos Mobile Home Park, Town of Apple Valley, San Bernardino County**

### **Introduction**

The following information is in response to the subject Notice of Violation (NOV) and subsequent letter of October 3, 2011 from Mr. John Morales of the California Regional Water Quality Control Board - Lahontan Region (Regional Board).

### **Background**

The Regional Board has indicated that Hometown America's (HA) September 2, 2011 response, to the above referenced NOV, dated August 22, 2011, was deficient and that the following information is to be provided in a supplementary report by November 3, 2011:

1. An estimated quantity of wastewater from the drain pipe located on the southeast section of the large percolation pond.
2. Pictures of the dump site, demonstrating that cleanup was successfully completed.
3. Surface soil sample resulting from the contaminated site along with background sample results to determine the effectiveness of the cleanup task.
4. Name and location of the final destination of the dry waste.
5. Documentation showing that the owner of the private parcel has been notified of the incident of placing the dry waste on his/her property.

### **Response**

Item No. 1 – As indicated in HA's September 2, 2011 NOV response letter, the drain pipe noted is believed to be part of the original plant design, possibly an old leach line, but its purpose is not known. The operator reported that minor amounts of potential discharge from the referenced drain pipe was contained by placing a bucket beneath the outlet to capture any discharge from the pipe, as seen in photo below. The discharge dripped into the bucket and was inspected daily by

the operator and drained periodically into the plant headworks. The dripping stopped after a few weeks. According to the Plant operator, the only discharge ever noticed was a periodic drip into the bucket, typically less than 1 gallon per week during the rainy season, the amount captured was estimated at less than 8 gallons. There has been no discharge whatsoever for several months and the end of the drain pipe has been permanently capped off, as seen in the photo below.

The plant operator reported that to his knowledge no pipe discharge has ever reached the perimeter V-ditch or has left the treatment plant site. During the recent cleaning of the large pond, some of the bottom material preventing percolation was placed on the berm walls to further prevent any seepage.



drain pipe emptying into bucket



capped drain pipe

Item No. 2 – Pictures of the area where the dry material from the large percolation pond cleaning was temporarily stored are included, showing that the area has been thoroughly cleaned. The pond was thoroughly dried prior to cleaning. The material was primarily carbonate crust and soil. It is our understanding that no disinfection of the area was performed by the contractor due to the dry nature of the material.



south side of WWTP looking east



south side of WWTP looking west



south side of WWTP looking east



south side of WWTP looking west

Item No. 3 – Four (4) soil samples were taken from the area where the dry material from the large percolation pond material was temporarily stored and two (2) soil samples were taken from the area immediately adjacent to the temporary storage area as background samples for comparison purposes. The samples were sent to a certified laboratory to test for organics and volatiles. The results of the testing are summarized below:

{Insert testing reports here}

Item No. 4 – The dry material removed from the large percolation pond was hauled away by a local contractor to an unknown location. The contractor’s information is as follows:

John Allison  
J Allison Construction  
15505 Comanche Road  
Apple Valley, CA  
92307-3274  
Phone # 760 240-4984

Repeated attempts to obtain this information from the contractor have been unsuccessful.

Item No. 5 – As reported in previous correspondence, the area where the contractor placed the dry material was thought to be owned by Hometown America and clearly used for access to the back side of the property and plant access gate. After researching county assessor maps, no record of ownership or easements by Hometown America have been discovered. The maps show the owner of record for the property (APNs 0441-011-28-0000 and 0441-011-32-0000) where the material was deposited is Kenneth Richmond, KARDI HOMES. The property owner has not been notified by Hometown America.

On behalf of HA, we are available to meet with you and your staff at your earliest convenience to discuss our plans in detail. Please contact me at (760) 479-4121 if you have any questions or concerns.

Sincerely,

John Pastore, P.E.  
Principal, Dudek

cc. Mindy Jackson, Hometown America