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Wastewater Enforcement: Pennsylvania Department of Environmental Protection Administrative Complaint Addressing Mercer County Mobile Home Park/Sewage Treatment Plant

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The Pennsylvania Department of Environmental Protection (“PDEP”) filed a February 27th Complaint for Civil Penalties (“Complaint”) before the Pennsylvania Environmental Hearing Board against Country Estates MHP, LLC (“Country Estates”).

Country Estates is described as the owner of a mobile home park operating a sewage treatment plant (“Plant”) in Mercer County, Pennsylvania.

The Plant is stated to have been constructed under the terms and conditions of a Water Quality Management Permit (“WQMP”). The WQMP is stated to authorize the following units at Country Estates to treat sewage flow of up to 15,000 gallons per day:

- Bar screen
- 15,000 gallon aeration tanks in series
- 1,567 gallon clarifier
- Approximately 1,600 gallon dosing tank
- 7,200 square foot sand filter
- 8,028 square foot sand filter in parallel
- 3,000 gallon sludge holding tank
- 3,275 gallon chlorine contact tank with tablet disinfection

PDEP is stated to have inspected the Plant on October 30, 2019, and determined:

- The treatment Plant aeration, sludge returns and clarifier skimmers were not operational
- The chlorinator was not properly installed due to the chlorine tube resting against the outlet pipe of the contact tank

An inspection on December 10, 2019, is stated to have identified:

- The comminutor, alum chemical addition, and effluent cascade aerator were not installed
- The sand filters were not properly draining

- One blower was not operational

PDEP is stated to have received an application from Country Estates through an engineer seeking to amend the WQMP to remove certain equipment on March 26, 2021, which was subsequently approved.

PDEP issued a National Pollutions Discharge Elimination System (“NPDES”) permit to Country Estates on June 19, 2015, authorizing discharges of treated sewage effluent from the Plant to an unnamed tributary to Lackawanna Creek. Country Estates is stated to have reported discharges from the Plant for various months between March 2018 and March 2022 that exceeded the effluent limits set forth in the NPDES permit.

Alleged violations identified in the Complaint include:

- Unlawful conduct under Section 611 of the Clean Streams Law, 35 P.S. § 691.611 and the terms and conditions of the WQMP
- Unlawful conduct under Section 611 of the Clean Streams Law, 35 P.S. § 691.611, and Part A of the NPDES permit

A copy of the Complaint can be downloaded [here](#).