



**Region 9 Enforcement and Compliance Assurance Division  
COMPLIANCE EVALUATION INSPECTION REPORT**

<b>Inspection Date(s):</b>	August 9, 2022	<b>Inspection Announced:</b> No	
<b>Time:</b>	<b>Entry:</b> 10:00 AM	<b>Exit:</b> 11:00 AM	
<b>Media:</b>	Safe Drinking Water Act		
<b>Regulatory Program(s)</b>	Underground Injection Control		
<b>Company Name:</b> Acton Holding Trust			
<b>Facility or Site Name:</b> Cactus Creek Mobile Home Park			
<b>Facility Location(s):</b> 3740 Smith Ave			
<b>(city, state, zip code)</b> Acton, CA 93510			
<b>Mailing Address:</b> 17100 Bear Valley Rd Ste B			
<b>(city, state, zip code)</b> Victorville, CA 92395			
<b>County:</b> Los Angeles County			
<b>Facility/Site Contact(s)</b>		The Acton Holding Trust	willdu03@yahoo.com
		Bill Trolinger, Site Manager	661-526-4411
<b>Facility/Site Identifier:</b> Parcel No. 3208-026-048			
<b>Inspector(s):</b>			
Maureen Munoz (author)	Signature and Date:		
	ECAD-3-3	Inspector	415-972-3782
Christopher Chen	Signature and Date:		
	ECAD-3-3	Inspector	213-244-1853
<b>Supervisor Review:</b>			
Lawrence Torres	Signature and Date:		
	ECAD-3-3	Manager	415-947-4211

## **SECTION I – INTRODUCTION**

### **Facility/Site Description**

Cactus Creek Mobile Home Park (the “Park” or “Property”) is a residential property located at 3740 Smith Ave, Acton, CA 93510. The Park is comprised of five occupied and two unoccupied mobile homes.

### **Pre-Inspection Research and Records Review**

On June 17 and June 21, 2022, we received two letters from the private organization Save Our Rural Town and the Acton Town Council respectively that both expressed concern over the potential operation of two large capacity cesspools servicing a mobile home park located at 3740 Smith Ave, Acton, CA 93510. Upon receiving the two letters, EPA staff reviewed the following:

1. California Department of Housing and Community Development April 14, 2022 Inspection Record for the Property;
2. Los Angeles Regional Water Quality Control Board December 23, 2019 Inspection Report of the Property;
3. Geographic Imagery via Google Maps; and
4. EPA’s R9 iWells database for inventoried Class V Wells.

Our pre-inspection research determined that the Property may be operating two cesspools for the disposal of sanitary wastewater. Considering these findings, the EPA Region 9 Enforcement and Compliance Assurance Division determined that there was enough information to warrant a Class V Well compliance evaluation inspection (CEI) at 3740 Smith Ave, Acton, CA 93510.

### **Purpose of the Inspection**

On August 9, 2022, Christopher Chen and I, EPA inspectors, conducted a Class V Well CEI of Cactus Creek Mobile Home Park, located in Acton, CA. Three inspectors from the LA Regional Water Quality Control Board (RWQCB) joined us for the inspection:

James Kang, Supervisor, Groundwater Permitting Unit  
Woonhoe Kim, Water Resource Control Engineer, Groundwater Permitting Unit  
Barbara Guia, Water Resource Control Engineer, Enforcement Unit

The purpose of the inspection was to confirm the Property’s compliance with the Safe Drinking Water Act (SDWA), Underground Injection Control (UIC) program’s Class V Well regulations provided in the Code of Federal Regulations (CFR), Title 40, Parts 144-148. Specifically, we were investigating compliance with EPA’s ban on Large Capacity Cesspools (LCCs), pursuant to 40 CFR § 144.88(a)(1)(i).

## Opening Conference

At approximately 10:00 AM, we arrived at the Property and spoke with Bill Trolinger, the site manager. Trolinger lived at Unit #10. We introduced ourselves to Trolinger and explained the purpose of our visit. Chen showed Trolinger his EPA-issued UIC inspector credential. I provided Trolinger with the Notice of Inspection form (NOI), and Trolinger agreed to sign it. Trolinger did not make a copy of the NOI.

We asked Trolinger general questions related to the management of the Property. Trolinger stated he had been the site manager for eight years, and Trolinger confirmed with Kang that the owner was Eric Hauck of the Acton Holding Trust, as listed in property databases available to the RWQCB. We requested Trolinger's and Hauck's contact information, and Trolinger provided both of their phone numbers and his own email address. Kang asked Trolinger if he knew the Property's point of contact from the state's Department of Housing and Community Development. Trolinger was not sure who the exact contact was, but the contact was from the Riverside office.

We asked Trolinger to describe how wastewater was disposed of on the Property. Trolinger gestured towards the location of two cesspools that service the mobile homes. Trolinger stated that the two cesspools were approximately 1000-gallon tanks that were pumped regularly once a year by Superior Pumping and twice a year if there was an emergency. Chen asked for the installation dates of the cesspools, and Trolinger stated that the cesspools were installed before he began working at the Park and did not know the installation dates. Trolinger approximated that the cesspools were last pumped three months ago. Chen asked if Trolinger possessed pumping receipts for the cesspools, and Trolinger said that he did not have any pumping receipts because the receipts are sent directly to the Property owner, Hauck. Trolinger said that there have been no issues with clogging or overflow from the two cesspools.

We asked Trolinger for the number of mobile home parks located on the Property. Trolinger stated the Park consists of seven mobile homes in total. Five mobile homes were occupied, and two mobile homes were unoccupied. The Park served five residents at the time of the inspection. Trolinger guessed that each cesspool received wastewater from half of the mobile homes each, but he was not confident in his knowledge of how wastewater was distributed to the cesspools.

Chen asked Trolinger to describe the approximate mapping of the drinking water lines in the Park, and Trolinger stated that he was not sure how the distribution pipes were mapped out. No maps or schematics were available of the wastewater lines. He stated that each home had one drinking water line each, and every line was connected to one main water line located towards the front of the Property. Trolinger believed that the main water line was the only line with a water meter. Water and electricity were included in the rent charged to residents. Rent was approximately \$500/month.

We asked if Trolinger may walk us to the location of the cesspools, but Trolinger declined due to health reasons and granted us permission to inspect the Property on our own.

## SECTION II – INSPECTION OBSERVATIONS

During the CEI, we observed the following:

- One cesspool (hereafter called “West Cesspool”) was located on the westside of the Property (Images 4-6). We did not observe clearly associated unit numbers for the homes. Roughly, this cesspool was located next to the southwest mobile homes. The mobile home it was located next to had no fencing and was the second-most southwest mobile home on the Property.

The West Cesspool was located within a shallow, rectangular hole that was covered by a loose plywood cover (Image 4). The cesspool itself was secured with a faded green plastic lid (Image 5). Red bricks were placed atop the cesspool lid. Spider webs and branches were scattered in the rectangular hole. The dirt area surrounding the cesspool was damp. We did not detect any pungent smells. One potable water faucet with a white hose was located next to the cesspool (Image 6).

- A second cesspool (“East Cesspool”) was located on the eastside of the Property in a mobile home’s yard (Image 9 and 10). This mobile home was located behind the red fencing with a red wooden gate located along 3<sup>rd</sup> street (Image 11). The cesspool was covered by a black house mat and a large orange traffic cone (Image 9). East Cesspool was secured by a faded green plastic lid with a cross-sectional pattern (Image 10), similar to the lid securing West Cesspool. The dirt covering East Cesspool was damp. One potable water faucet with a green hose was located next to the cesspool (Image 10).
- We observed above-surface black piping that was located near the southwest mobile homes that traced along the outside of the mobile homes and continued under a large pile of debris covered by a black tarp (Image 3 and 7). We were unable to observe where the pipes led to due to the pile of debris. Although the piping was near the West Cesspool (Image 6), the pipes did not appear to connect to either of the cesspools.
- We observed above-surface black pipes with a vent located near a mobile home located towards the middle east side of the Property (Image 8). We were unable to identify where the piping connected to.
- We observed above-surface black pipes that connected to a washer and dryer located outside one of the northeastward mobile homes, and the piping branched off towards the back of the mobile home (Image 12). We were unable to identify where the rest of the piping connected. The black piping connected to a pipe that led to an open discharge point pointed towards 3<sup>rd</sup> Street (Image 13).

### **SECTION III – REGULATORY CONCERN**

An LCC is a cesspool that serves multiple dwellings, or for non-residential facilities, is a cesspool that has the capacity to serve 20 or more persons per day (See 40 C.F.R. § 144.81(2)). Pursuant to the UIC program regulations, all existing LCCs should have been closed by April 5, 2005 (See 40 C.F.R. § 144.88). The UIC requirements do not apply to single family residential cesspools, nor to non-residential cesspools which receive solely sanitary waste and have the capacity to serve fewer than 20 persons a day. 40 CFR § 144.81(2). Any cesspool that does not fit within one of the two exceptions is considered a Large Capacity Cesspool and should have been closed.

Additional follow-up with the Acton Holding Trust is necessary to identify the type of wastewater collection system installed.

**SECTION IV – INSPECTION PHOTO LOG**



**Image 1:** Front of the mobile home park. Includes the street number and mobile home park name.



**Image 2:** Two mobile homes located at the southeast end of the Property.





**Image 3:** Black above-surface pipeline between two mobile homes on the southwest side of the Park.



**Image 4:** Unsecure plywood cover placed above West Cesspool.



**Image 5:** West Cesspool cover had red bricks on top. White hose located on the left of the image is connected to potable water faucet.





**Image 6:** Another angle of West Cesspool. white hose, and potable water line as pictured/referenced in Image 5.



**Image 7:** Pipeline connected to the pipes pictured in Image 3. Continued under covered debris pile.



**Image 8:** Black pipe and vent connected to a mobile home.





**Image 9:** East Cesspool was located under traffic cone and black house mat. Green hose connected to potable water faucet pictured on the left.





**Image 10:** East cesspool cover. Green hose and potable water faucet located west of cesspool.



**Image 11:** Red fence located on the eastside of the Property, facing 3<sup>rd</sup> St. East Cesspool was located behind the fence.



**Image 12:** Black pipes connected to washer and dryer and branches off behind the mobile home. Appeared to connect to the pipe pictured in Image 13.



**Image 13:** Open black pipe protruding from ground. Appeared to connect to black pipes in Image 12.