



MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

ARVC Michigan

June 29, 2022

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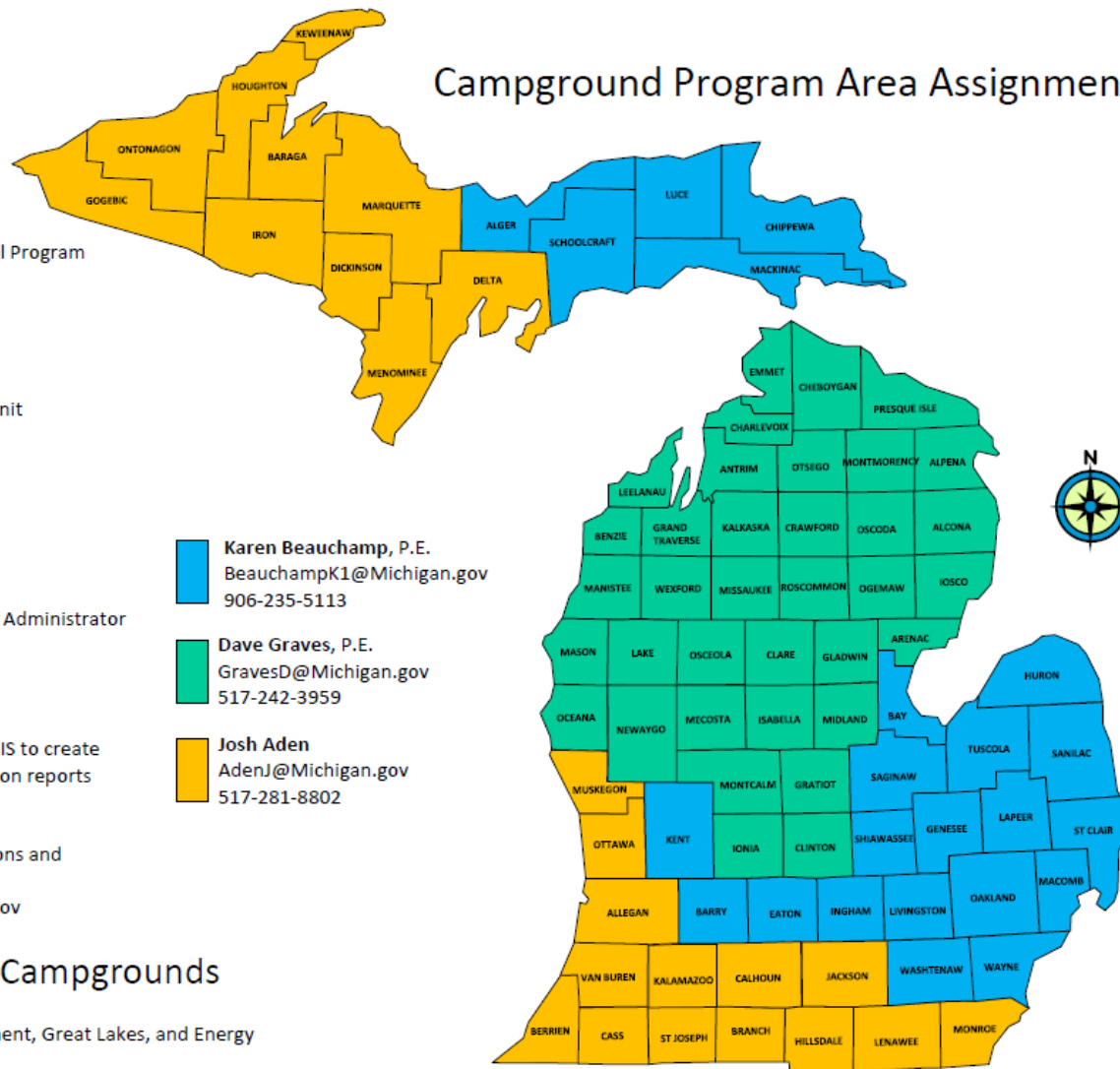
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Use Michigan.gov/EGLE-MI-EHDWIS to create
an account to submit LHD inspection reports
via MiEHDWIS@Michigan.gov.

For quarterly LHD financial questions and
quarterly FSR reporting
EGLE-DWEHD-Admin@Michigan.gov

Michigan.gov/EGLECampgrounds

Michigan Department of Environment, Great Lakes, and Energy
June 2022



Drinking Water and Environmental Health Division

Licensing Process

- License Renewal Application and Invoice are mailed mid-October every year. Application, invoice and payment due back by December 31.
- \$100 Late Fee is assigned after 12/31.
- Most owners apply/pay for a 1-year license yearly.
- Some owners apply/pay for a 2-year or 3-year license (upper right corner). A multi-year license still requires an annual LHD inspection.
- A license is issued or held based on the previous year's LHD Inspection Report (imminent hazards/drinking water concerns).
- Repeat Violation results in a License Condition.
- Licenses can be held until a satisfactory inspection proving compliance is received. EGLE will send a letter with each license hold prioritizing corrections to be made.
- **Submit Annual/Follow-Up Inspections ASAP (max 2 weeks per contract) in case a license is held and awaiting your inspection!**

Construction Permit Process – Owner submits application, 3 sets of plans and payment

EGLE Campground Construction Permit required prior to:

- **Adding, subtracting, re-configuring campsites**
- **New/extended water or sewer lines**
- **Well demand increase or sewage flow increase**
(additional sites, service building, store, other structures)

LHD responsible for most local well/onsite sewage permitting – EGLE and LHD work jointly. EGLE available to assist with flow rates/sizing. EGLE is trying not to duplicate permitting efforts – treat Campgrounds like other commercial establishments.

If project exceeds \$15,000, the plans the owner submits must be sealed by a licensed engineer. EGLE and LHD work jointly.

If the estimated flow rate is over 10,000 gpd, the owner must submit engineered plans for onsite sewage design to EGLE. EGLE will review and permit the onsite system.

CAMPING CABINS/RESORT CABINS

- **Camping Cabins** are defined as a “recreational unit” like a tent or RV. Under 400 sq ft, no plumbing fixtures, must be on a licensed campsite, may need local building permit (100 sq. ft - varies) and must have local electrical permits/finals. Conv outlet ok.
- **Resort Cabins** (aka carriage house, tiny home, cabin, etc.) are not defined as a “recreational unit.” Local zoning, building, plumbing, electrical permits/finals must be obtained. No EGLE Construction Permit needed for the structure. Past EGLE Construction Permits have included design flows for resort cabins – or they were built after the fact. Going forward, attempting to separate [water and sewer construction] for the two different land uses/structures. Plan to note on CPs that the permit is issued for recreational units only.
 - “Tiny Houses” trend – Must be built as a RESORT (not campground) with LHD permitting well, septic tanks and drainfield(s). Local zoning, building, electrical, plumbing permits and final approvals under local authorities. Even if built “on wheels,” these can’t be treated as “recreational units”.
 - “Park Model Recreational Units” certified under ANSI Standard A119.5 can be placed on licensed campsites, but tiny houses built on trailers are not always manufactured/certified A119.5.

Electrical Work

Commercial property = licensed electrician, under local electrical permit and final inspection.

- Site service, new/upgrades to service, resort cabins, camping cabins, buildings, etc.
- People sleep in RVs and cabins – electrical must be safe.



UTILITIES TO REMAIN ABOVE GRADE UNLESS INSTALED UNDER AN ELECTRICAL/PLUMBING PERMIT

- Buried extension cords and buried water hoses are not approved (even if placed in PVC and goose-necked to prevent flooding). This outdated practice does not meet state electrical or state plumbing codes for buried utilities.
- EGLE's stance: No new conduits allowed. We will support LHDs if they pursue removal of existing – especially when there are water quality issues/BacT MCLs.



Site Water Connections

- **Backflow prevention requirements at site water connections are inconsistent across state.**
 - AVB is not appropriate when there are downstream valves (and valves are present in RVs).
 - AVB/PVB would have to be 6" higher than the highest piping/outlet.
- **EGLE Campground Program does not require AVBs at most site water connections due to RV ANSI Standard 1192 (30+ year old standard) and due to the presence of downstream shut-off valves present in RVs.**

ANSI/NFPA 1192 – Standard on Recreational Vehicles (American National Standards Institute / National Fire Protection Association)

WebStore.ANSI.org

Search 1192-2008 (52 page .pdf \$56)

NFPA 1192-2008

NFPA 1192: Standard on Recreational Vehicles, 2008 Edition

Expanded 2008 NFPA 1192 is the key to recreational vehicle fire safety.

With unique characteristics of size and use, recreational vehicles require a distinct set of fire and life safety criteria to guard against the hazards of fire and explosions. Apply the 2008 NFPA 1192: **Recreational Vehicles for comprehensive provisions for the correct installation of plumbing, fuel-burning, electrical, and other safety-related systems.**

Technical changes in the expanded 2008 NFPA 1192 include revised requirements for recreational vehicle exits, a new annex on product listing standards, and two important new sections addressing:

Testing high-pressure piping systems for gas leakage

Fuel tank construction

This widely used document replaced ANSI A119.2 with a complete set of merged rules regulating the full spectrum of safety in recreational vehicles. Manufacturers and authorities depend on the 2008 NFPA 1192 for the latest protocols for the protection of people, property, and the environment

ANSI/NFPA 1192 Standard on Recreational Vehicles
(Excerpt)

Chapter 3 Definitions

3.3.6 Backflow Preventer. A device or means to prevent backflow.

3.3.12 Connection

3.3.12.1 Cross Connection.

3.3.12.1 Water Service Connection.

3.3.61 Vacuum Breaker. A device that prevents back siphonage by allowing

atmosphere air pressure into the system.

3.3.62 Valve.

3.3.62.1 Backflow Check Valve.

Chapter 7 Plumbing Systems

7.3 Water Distribution Systems.

7.3.8 Water Service Connections, Outlets, and Backflow Prevention.

7.3.8.6 Potable water supply piping or fixture or appliance connections shall be installed to prevent backflow (see 7.3.10).

7.3.9 Water Outlets.

7.3.9.1 Unless they are individually protected by a listed backflow preventer or anti-siphon device, the outlets of faucets, spouts, and similar devices shall be spaced at least 1 in. (25 mm) above the flood level of the fixture.

7.3.9.2 Valved hose outlets shall be installed to prevent a cross connection.

7.3.9.3 A listed backflow preventer or anti-siphon device, hose length, or an installed retaining device to prevent cross connections shall be permitted to be used.

7.3.9.4 When using hose length or a retaining device, the extreme end of the assembly shall be a minimum of 2 in. (51 mm) above the flood plane of the closest fixture.

7.3.9.5 An outside shower hose assembly shall have a listed backflow preventer or anti-siphon device to preclude cross connections unless the extreme end of the assembly is more than 12 in. (305 mm) above the ground in its free-hanging position.

7.3.10 Backflow Prevention Device. When nonpressurized water storage tank(s) (reservoirs) [except water heater(s)] for storing potable water are connected to the water distribution system of recreational vehicles that have a water service connection for an outside source of supply, they shall have an approved or listed backflow check valve or other approved or listed type backflow prevention device installed in the water supply piping adjacent to the water service connection.

AFTER-MARKET RV SUPPLIES

- Hoses used at site water connections must keep drinking water safe for human consumption. Look for a stamp, NSF rating, listing or a third-party certification proving the hose was designed to carry drinking water.



- Uncertified hoses may not be food-grade and may be toxic. Owners should not allow/sell/supply uncertified hoses for drinking water.



After-Market RV Supplies

Direct connections between drinking water supply and sewage require immediate removal and education.



Honey Wagon Service vs. Pumping Vault/Portable Privies

- “Honey wagons” are allowed per Rule 9.8 but intended as a “mechanical pump-out facility” to be used by the owner/staff for RV waste holding tanks only. This Rule was not intended for privy waste.
- CG Rule 9.8 is already conflicting with Part 117 of PA 368 (Septage) - which doesn’t allow anyone but a licensed septage hauler to pump/haul septage.



Honey Wagon Service vs. Pumping Vault/Portable Privies

- Owner may not pump out privies. Owner must hire licensed septage hauler for privy pump-outs. Hauler must then take privy waste to approved land app site/receiving station. Hauler and campground owner must keep privy waste out of the sanitary dump stations to protect the groundwater due to higher strength waste (no graywater).
- EGLE, Water Resources Division (WRD) requesting EGLE EH Section to re-look at holding tank (pump and haul) or treatment options at sanitary stations when graywater levels are too low.

Rule 18: Seepage Pits

- LHD asked to note # of seepage pits. Owner not allowed to construct more than what licensed for (no new pits after 2000 Rule revision).
- A seepage pit is not allowed where a site water connection is present (unless approved by LHD).
- Discharge line ≤ 1.5 " diameter.
- Graywater must discharge below surface.
- Rule 18.2 allows LHDs to phase these out.
- “Blue Boy” holding tanks are recommended over seepage pits to protect groundwater.



SANITARY DUMP STATIONS



Rule 7: Managers

- Post a sign explaining where off-duty manager can be contacted
- Post a sign with following emergency info
OR provide the info at check-in:
 - Location of nearest telephone available 24/7.
 - Locations and phone numbers for
 - Police
 - Fire
 - Medical Assistance



General Info - Inspections

- All recreational units (RVs, tents, camping cabins) must be on licensed, numbered campsites. Coherent site numbering is vital for emergency response personnel.
- A Group Camping Area must have a sign identifying the name of the Area (for emergency response purposes) and the max capacity of people.

$\text{Sq Ft} / 1200 = \# \text{ equivalent sites and recreational units.}$

$\# \text{ sites} \times 8 = \text{max capacity of people.}$

- Verify all septic tank riser lids are childproof (secured to tank).
- Convenience outlets to be unthreaded. AVBs needed at buildings.
- Number of sites/sites utilities will be compared to current license. Direct owners to contact EGLE Campground Program prior to construction for permit assistance.

Rule 35: Swimming Pools and Beaches

RULE 35: “A swimming pool or a bathing beach at a campground shall comply with the provisions of sections 12521 through 12563 of the act (*Sections of Part 125 of the Public Health Code related to pools/beaches*) and R 325.2101 to R 325.2103 (*Bathing Beach Rules*) and R 325.2111 to R 325.2199 (*Swimming Pool Rules*) of the Michigan Administrative Code.”

Bathing Beaches Continued

Sec. 12451.5.a ““Bathing beach” means a beach or bathing area offered to the public for recreational bathing or swimming. It does not include a public swimming pool...”

Sec. 12451.3 “The owner of a bathing beach shall post at the main entrance to the bathing beach or other visible location, a sign that states whether or not the bathing beach has been tested or evaluated (*sampled for E. coli*)...and, if the bathing beach has been tested, the location of where test results may be reviewed. *Open stretches of beach or beaches at road ends, that are not advertised or posted as public bathing beaches, do not need to have signs posted.*” (i.e., Hwy 2 Lakeshore)



Bathing Beaches Continued

Sec. 12542 “The owner or a person in charge of a public bathing beach shall provide and maintain suitable and adequate safety and rescue equipment and suitable and adequate means of communication with outside sources of assistance, which shall be available and accessible at the public bathing beach when it is open to bathers.”

******* This is subjective language if you don't have a bathing beach ordinance. *******

National Oceanic and Atmospheric Admin (NOAA) concerned about high # of Great Lakes drownings. NOAA working with Office of Great Lakes on weather patterns/rip currents. (Focus has shifted from E. coli to Algal Blooms to drownings.)

“Over the past 12 years, 138 Great Lakes swimmers have drowned in incidents blamed at least in part on rip currents and other dangerous currents. Half of those deaths, 69 of them, occurred in Michigan.”

Bathing Beaches Continued

- Unfortunately, there is no state bathing beach program, funding or oversight for this specific, original 1978 legislation in PA 368. The EGLE Campground Program recently obtained an informal opinion from the Attorney General's office.
- Counties that have adopted their own local bathing beach ordinance typically have specific requirements regarding “suitable and adequate safety and rescue equipment.”

BATHING BEACH SAFETY/RESCUE



- The term “suitable and adequate safety and rescue equipment” is subjective. EGLE has partnered with Great Lakes Water Safety Consortium. Their recommended best practice is 20” throw ring (preferably orange with grab handles) tied to 75’ float rope with signage.



- Due to the expansive amount of surface water in MI, non-buoyed water bodies adjacent to state land are not regulated as bathing beaches per DNR Parks & Rec Policy #3.6 “Designated Beaches.”

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