Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 16, 2011

Wayne Mobile Inc.
Attn: Mr. Dale Dakin
P.O. Box 613
Waynesville, OH 45068

RE: Wayne Mobile Inc. WWTW/Compliance Evaluation Inspection
NPDES Permit No. OH0131806/OEPA PERMIT NO. 1PV00113*AD
Notice of Violation

Dear Mr. Dakin:

On November 7, 2011, I conducted a NPDES Compliance Evaluation Inspection at the Wayne Mobile Inc. wastewater treatment works (WWTW). The main purpose of the inspection was to discuss NPDES permit compliance schedule violations incurred by Wayne Mobile Inc., and to formulate a path for a return to compliance with the NPDES permit. Mr. Keith Kroeger (Ohio EPA Compliance Assistance Unit), Mr. John Eastman (engineer) and you were present during the inspection. The attached report highlights the main points of the meeting and also reflects observations that were made during the inspection.

Thank you for the time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

Cc: John Eastman, LJB (with attachments)
Keith Kroeger, Ohio EPA (with attachments)

Enclosures

Southwest District Office
401 East Fifth Street
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OhioEPA

State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES#**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
1PV00113*AD	OH0131806	11/7/2011	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
Wayne Mobile Inc. 5434 North Waynesville Road Waynesville, Warren County	1:00 p.m.	
	Exit Time	**Permit Expiration Date**
	2:40 p.m.	
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Dale Dakin, Owner Ken Combs, Operator of Record	937-657-2622 (cell) 513-328-8117	
Name, Address and Title of Responsible Official	**Phone Number**	
Dale Dakin, Owner P.O. Box 613 Waynesville, OH 45068	937-657-2622 (cell) 937-289-2244 (fax)	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
N	Permit	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	U	Compliance Schedule
N	Operations & Maintenance	N	Effluent/Receiving Waters	N	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

See Attached Report.

Inspector	Reviewer
11-16-2011	11/16/2011
Joshua Jackson Division of Surface Water Southwest District Office Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date

Inspection Findings

The main purpose of the inspection was to meet with Mr. Dakin and discuss the severity of the NPDES permit violations. Joshua Jackson, Keith Kroeger (Ohio EPA Compliance Assistance Unit), Dale Dakin (Wayne Mobile Inc., owner) and John Eastman (engineer) were present during the meeting.
Ohio EPA Southwest District Office has already sent two Notice of Violation letters to Mr. Dakin for failure to abide by the dates listed in the NPDES compliance schedule; they are as follows: 1) *submit detailed plans for plant and sewer system improvements by no later than 8 months from the effective date of the permit (which would be February 1, 2011)* and 2) *commence construction as soon as possible (on the approved WWTW improvements), but no later than 16 months from the effective date of this permit (which would be October 1, 2011).* The purpose of the schedule was to allow Mr. Dakin time to make the necessary WWTW improvements in order to achieve compliance with the final effluent limit table. . During this same period of time, the existing WWTW has incurred several effluent (interim) limit violations as documented below:

EFFLUENT LIMIT VIOLATIONS
(Period of Review: June 2010 – October 2011)

7D = Weekly 30D = Monthly 1D = Daily
Conc. = Concentration (mg/l) Qty.= Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
June 2010	E. coli	30D Conc	126	20000.
June 2010	CBOD 5 day	30D Conc	25	66.
June 2010	Total Suspended Solids	30D Conc	30	37.
June 2010	Dissolved Oxygen	1D Conc	6.0	.85
June 2010	E. coli	7D Conc	298	20000.
June 2010	CBOD 5 day	7D Conc	40	66.
June 2010	Dissolved Oxygen	1D Conc	6.0	.75
June 2010	Dissolved Oxygen	1D Conc	6.0	1.
June 2010	Dissolved Oxygen	1D Conc	6.0	1.2
July 2010	E. coli	30D Conc	126	6230.
July 2010	Dissolved Oxygen	1D Conc	6.0	1.5
July 2010	Dissolved Oxygen	1D Conc	6.0	1.6
July 2010	E. coli	7D Conc	298	6230.
July 2010	Dissolved Oxygen	1D Conc	6.0	1.5
July 2010	Dissolved Oxygen	1D Conc	6.0	1.5
August 2010	Total Suspended Solids	30D Conc	30	43.5
August 2010	CBOD 5 day	30D Conc	25	536.
August 2010	E. coli	30D Conc	126	6670.
August 2010	Dissolved Oxygen	1D Conc	6.0	1.85

August 2010	E. coli	7D Conc	298	6670.
August 2010	CBOD 5 day	7D Conc	40	536.
August 2010	Dissolved Oxygen	1D Conc	6.0	1.6
August 2010	Dissolved Oxygen	1D Conc	6.0	1.7
August 2010	Dissolved Oxygen	1D Conc	6.0	3.
September 2010	E. coli	30D Conc	126	6670.
September 2010	Dissolved Oxygen	1D Conc	6.0	2.9
September 2010	E. coli	7D Conc	298	6670.
September 2010	Dissolved Oxygen	1D Conc	6.0	3.1
September 2010	Dissolved Oxygen	1D Conc	6.0	3.
September 2010	Dissolved Oxygen	1D Conc	6.0	2.9
October 2010	E. coli	30D Conc	126	6670.
October 2010	Dissolved Oxygen	1D Conc	6.0	3.2
October 2010	E. coli	7D Conc	298	6670.
October 2010	Dissolved Oxygen	1D Conc	6.0	1.9
October 2010	Dissolved Oxygen	1D Conc	6.0	2.9
October 2010	Dissolved Oxygen	1D Conc	6.0	3.1
November 2010	Dissolved Oxygen	1D Conc	6.0	3.2
November 2010	Dissolved Oxygen	1D Conc	6.0	3.5
November 2010	Dissolved Oxygen	1D Conc	6.0	3.6
November 2010	Dissolved Oxygen	1D Conc	6.0	2.9
December 2010	Dissolved Oxygen	1D Conc	6.0	3.1
December 2010	Dissolved Oxygen	1D Conc	6.0	2.9
December 2010	Dissolved Oxygen	1D Conc	6.0	3.1
December 2010	Dissolved Oxygen	1D Conc	6.0	2.9
January 2011	Dissolved Oxygen	1D Conc	6.0	3.1
January 2011	Dissolved Oxygen	1D Conc	6.0	2.9
January 2011	Dissolved Oxygen	1D Conc	6.0	2.8
January 2011	Dissolved Oxygen	1D Conc	6.0	2.6
February 2011	Dissolved Oxygen	1D Conc	6.0	2.8
February 2011	Dissolved Oxygen	1D Conc	6.0	3.1
February 2011	Dissolved Oxygen	1D Conc	6.0	2.1
February 2011	Dissolved Oxygen	1D Conc	6.0	2.9
March 2011	Dissolved Oxygen	1D Conc	6.0	3.2
March 2011	Total Suspended Solids	30D Conc	30	84.
March 2011	Total Suspended Solids	30D Qty	2.28	3.1794
March 2011	Dissolved Oxygen	1D Conc	6.0	2.7
March 2011	Total Suspended Solids	7D Conc	45	84.
March 2011	Dissolved Oxygen	1D Conc	6.0	3.1
March 2011	Dissolved Oxygen	1D Conc	6.0	2.9
April 2011	Total Suspended Solids	30D Qty	2.28	8.75849
April 2011	Dissolved Oxygen	1D Conc	6.0	2.9
April 2011	Total Suspended Solids	30D Conc	30	178.
April 2011	Total Suspended Solids	7D Conc	45	178.
April 2011	Dissolved Oxygen	1D Conc	6.0	2.5
April 2011	Total Suspended Solids	7D Qty	3.41	8.75849
April 2011	Dissolved Oxygen	1D Conc	6.0	2.1
April 2011	Dissolved Oxygen	1D Conc	6.0	2.2

May 2011	E. coli	30D Conc	126	411.
May 2011	Dissolved Oxygen	1D Conc	6.0	2.1
May 2011	E. coli	7D Conc	298	411.
May 2011	Dissolved Oxygen	1D Conc	6.0	2.5
May 2011	Dissolved Oxygen	1D Conc	6.0	2.6
May 2011	Dissolved Oxygen	1D Conc	6.0	2.5
June 2011	E. coli	30D Conc	126	2419.6
June 2011	Total Suspended Solids	30D Qty	2.28	3.69416
June 2011	Dissolved Oxygen	1D Conc	6.0	3.1
June 2011	Total Suspended Solids	30D Conc	30	61.
June 2011	Dissolved Oxygen	1D Conc	6.0	2.9
June 2011	Total Suspended Solids	7D Qty	3.41	3.69416
June 2011	E. coli	7D Conc	298	2419.6
June 2011	Total Suspended Solids	7D Conc	45	61.
June 2011	Dissolved Oxygen	1D Conc	6.0	3.2
June 2011	Dissolved Oxygen	1D Conc	6.0	3.2
July 2011	Dissolved Oxygen	1D Conc	6.0	3.2
July 2011	E. coli	30D Conc	126	2419.6
July 2011	E. coli	7D Conc	298	2419.6
July 2011	Dissolved Oxygen	1D Conc	6.0	2.9
July 2011	Dissolved Oxygen	1D Conc	6.0	3.2
July 2011	Dissolved Oxygen	1D Conc	6.0	2.9
August 2011	Total Suspended Solids	30D Conc	30	62.
August 2011	Total Suspended Solids	30D Qty	2.28	9.85614
August 2011	Dissolved Oxygen	1D Conc	6.0	3.1
August 2011	E. coli	30D Conc	126	2419.
August 2011	Dissolved Oxygen	1D Conc	6.0	3.2
August 2011	Total Suspended Solids	7D Qty	3.41	9.85614
August 2011	Total Suspended Solids	7D Conc	45	62.
August 2011	E. coli	7D Conc	298	2419.
August 2011	Dissolved Oxygen	1D Conc	6.0	3.4
August 2011	Dissolved Oxygen	1D Conc	6.0	3.4
September 2011	Dissolved Oxygen	1D Conc	6.0	3.2
September 2011	E. coli	30D Conc	126	2420.
September 2011	Dissolved Oxygen	1D Conc	6.0	3.3
September 2011	E. coli	7D Conc	298	2420.
September 2011	Dissolved Oxygen	1D Conc	6.0	2.9
September 2011	Dissolved Oxygen	1D Conc	6.0	3.4
October 2011	E. coli	30D Conc	126	2419.6
October 2011	Dissolved Oxygen	1D Conc	6.0	3.4
October 2011	E. coli	7D Conc	298	2419.6
October 2011	Dissolved Oxygen	1D Conc	6.0	3.6
October 2011	Dissolved Oxygen	1D Conc	6.0	3.5
October 2011	Dissolved Oxygen	1D Conc	6.0	3.4

During the course of the meeting Mr. Dakin stated that he was planning to sign a contract with Mr. Eastman to design the upgrade of the WWTW, but he only wanted to perform needed improvements because of the high cost of the project. Mr. Eastman discussed the possibility of re-rating the 20,000 gallon/day WWTW to a lower, permitted average daily design flow (ADDF) so that the size of needed treatment units could be reduced. Mr. Dakin pointed out that the original plant was designed to treat more mobile home units but the property on which the mobile homes would have been located (across the street from the existing park) was sold and is now occupied by homes on individual lots. Wayne Mobile Inc. has reached a maximum capacity of 71 mobile home lots.

Ohio EPA does not object to re-rating this WWTW, but since discharge flow for the existing WWTW is measured through the facility's water meter, there is not an accurate picture of: 1) peak hourly influent flow rates; and 2) the effects of infiltration and inflow on the sewage collection system after a precipitation event. In order to gain more useful data, Keith Kroeger will install multiple water level loggers (HOBOs) in the chlorine contact tank after Mr. Dakin constructs a temporary rectangular weir for flow regulation (under the direction of John Eastman). (Update: Keith Kroger contacted me on November 14, 2011 to give a status report. Mr. Dakin had installed the weir and Keith installed the HOBOs and will begin emailing John Eastman and I flow data as he retrieves it.)

Keith Kroeger will continue to retrieve flow data and submit it to John Eastman and I until which time we are both comfortable with a design average daily flow and a design peak hourly flow for the WWTW upgrade. We all agreed that this information-gathering phase should be completed by no later than January 15, 2012. At that time John Eastman and I will also discuss the scope and size of treatment units and any additional design questions/information that will be needed for the permit-to-install submittal.

Mr. Eastman and Mr. Dakin will have until March 15, 2012 to submit an approvable permit-to-install (PTI) application to Ohio EPA for upgrades to the WWTW serving Wayne Mobile Inc. At that time, an application to modify the existing NPDES permit must also be submitted so that the NPDES compliance schedule can be formally changed to reflect the current deadlines. If Mr. Eastman and Mr. Dakin propose to re-rate the permitted ADDF for the WWTW, this must also be reflected in the application to modify the permit.

At the time of the PTI application submittal, Mr. Dakin will need to provide a revised schedule for initiating construction on the WWTW improvements, completing construction of the WWTW improvements and achieving compliance with the final effluent limit table in the NPDES permit. The revised schedule shall not exceed the current expiration date of the NPDES permit.

If any of the action items described in this report is not achieved, Ohio EPA Southwest District Office will recommend enforcement action against ownership of Wayne Mobil Inc.

Items Noted During the Inspection

- The mixed liquor was chocolate brown in color with no objectionable odor. Keith Kroger performed a settleometer test on the mixed liquor and determined that Mr. Dakin should waste more.
- Since Keith Kroeger visited the facility in September, the final effluent results have dramatically improved. The final effluent results for October 2011 were within NPDES permit limits for nitrogen-ammonia, $CBOD_5$ and total suspended solids.
- The dissolved oxygen results have still be low (<3 mg/l). John Eastman spoke to Mr. Dakin about adding a diffuser onto the air line that is currently in the chlorine contact tank.
- The final effluent from the chlorine contact tank was relatively free of noticeable solids.