



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

September 16, 2013

Mr. Dale Dakin, Owner  
 P.O. Box 613  
 Waynesville, OH 45068

**RE: Notice of Violation  
 Wayne Mobile, Inc., WWTW/Compliance Evaluation Inspection  
 NPDES Permit No. OH0131806/OEPA Permit No. 1PV00113\*BD**

Dear Mr. Dakin:

On September 11, 2013, Glen Vonderembse and I conducted an NPDES compliance evaluation inspection at the Wayne Mobile, Inc., wastewater treatment works (WWTW). You were present throughout the inspection. The purpose of the inspection was to evaluate the Village's compliance with the NPDES (discharge) permit and to assess the construction progress on the WWTW upgrade.

**EFFLUENT LIMIT VIOLATIONS**  
 (Period of Review: January – July 2013)

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

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value
May 2013	001	E. coli	30D Conc	126	7400.
May 2013	001	E. coli	7D Conc	284	7400.
July 2013	001	Total Suspended Solids	30D Conc	12	39.
July 2013	001	Total Suspended Solids	7D Conc	18	39.
July 2013	001	Total Suspended Solids	30D Qty	0.682	2.06661
July 2013	001	Total Suspended Solids	7D Qty	1.03	2.06661
July 2013	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.8
July 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.8
July 2013	001	Nitrogen, Ammonia (NH3)	30D Qty	0.0568	.14837
July 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	0.0852	.14837

\*Wayne Mobile, Inc., did not provide any self-notification reports for the violations shown above.

Part III, item 12. (A)(1), "Noncompliance Notification" states the following:

The permittee shall report noncompliance that is the result of any violation of a daily maximum discharge limit for any of the pollutants listed by the Director in the permit by email or telephone within twenty-four (24) hours of discovery.

The permittee may report to the appropriate Ohio EPA district office email account as follows (this method is preferred):

Southwest District Office: [swdo24hournpdes@epa.state.oh.us](mailto:swdo24hournpdes@epa.state.oh.us)  
*(the facility contact, Michelle Waller, should be copied on the email [michelle.waller@epa.ohio.gov](mailto:michelle.waller@epa.ohio.gov))*

The permittee shall attach a noncompliance report to the email. A noncompliance report form is available on the following web site:

<http://www.epa.ohio.gov/dsw/permits/permits.aspx>

### WWTW Upgrade

On February 5, 2013, Ohio EPA approved detailed plans for the upgrade of the WWTW serving Wayne Mobile, Inc. The improvements were necessary in order to achieve compliance with the pollutant limitations within the facility's NPDES permit. The salient features of the WWTW project are as follows:

- Modifications to the existing extended aeration package plant including adding a second blower; refurbish the existing blower; replace the sludge return line with PVC; and install six new sacrificial anodes.
- Installation of a new lift station, force mains, associated appurtenances, and controls to dose the proposed surface sand filters.
- Installation of two new surface sand filters at 625 square feet, each.
- Installation of an ultraviolet disinfection system.
- Installation of a post aeration operation with a linear air pump with fine bubble diffusers.
- Replacement of the existing effluent discharge to accommodate site construction.

**At the time of the inspection, all of the improvements had been completed with the exception of the installation of the sacrificial anodes and replacing the sludge return lines (rusted) with PVC. These items must be completed no later than October 28, 2013.**

### Discharge Flows

The reported daily discharge flow rates for WWTW appeared to be high (greater than

15,000 gpd). Currently, Mr. Dakin utilizes the water meter for measuring discharge flows, which is an acceptable method. However, since the reported flows appear to be almost double the discharge flows measured by Keith Kroeger prior to the design of the WWTW upgrade (utilizing level-sensing data sondes in the WWTW effluent channel), it appears another method should be utilized.

The new control panel for the sand filter dosing pumps is equipped with an elapsed time meter. A pump-down test should be conducted to determine the appropriate gallons/minute for the pumps. Once the test is completed, the elapsed time meter should be utilized for measuring daily discharge flows (by taking readings every day and converting the pump time into gallons/minute and then into million gallons/day).

#### Operator of Record Logbook Storage

Currently, the ORC logbook is stored with the ORC or in the wellhead building. Ohio Administrative Code 3745-7-09 (1) and (2) state the following:

- (1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
- (2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.

**Ownership of Wayne Mobile, Inc. shall provide weather-proof storage for the ORC logbook by no later than October 28, 2013. This storage shall be within the WWTW grounds and the logbook should not be removed from this location. I explained to Mr. Dakin that a properly-sized mailbox would meet the requirements of the rule.**

#### Outfall Signage

At the time of the inspection, there was no outfall identification sign observed by the effluent pipe. This is a violation of Part II, Item H. of the NPDES permit for Wayne Mobile, Inc., which states the following:

Not later than 4 months from the effective date of this permit, the permittee shall post a permanent marker on the river bank at each outfall that is regulated under this NPDES permit where a marker does not currently exist. This includes final outfalls, bypasses, and combined sewer overflows. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking

along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible. If the outfall is normally submerged the sign shall indicate that. If the outfall is a combined sewer outfall, the sign shall indicate that untreated human sewage may be discharged from the outfall during wet weather and that harmful bacteria may be present in the water. When an existing marker is replaced or reset, the new marker shall comply with the requirements of this section.

**A properly designed outfall sign must be installed according to the requirements in the NPDES permit by no later than October 28, 2013.**

Additional Items Noted During the Inspection



**The connection between the existing, steel, extended aeration system and the new sand filter dosing tank.**



**New sand filter distribution box.**



**New sand filters.**



**New ultraviolet disinfection system.**



**New post-aeration chamber with bubbler.**



**Effluent sampling port next to post-aeration chamber.**



**New effluent line and rock channel discharge point.**



Discharge to the Little Miami River

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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) 285-6342 or by email at [joshua.jackson@epa.state.oh.us](mailto:joshua.jackson@epa.state.oh.us).

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Jackson', with a long horizontal flourish extending to the right.

Joshua Jackson  
Environmental Specialist II  
Division of Surface Water

JJ/kb

ec: Angie Tipton (w/attachments)

Enclosures



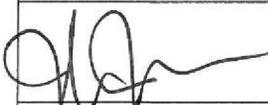
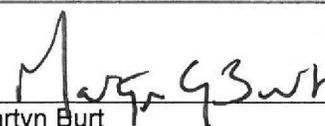
John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
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Division of Surface Water-Southwest District Office

### NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00113*BD	OH0131806	9/11/2013	C	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	9:50 a.m.	1/1/2013
	<b>Exit Time</b>	<b>Permit Expiration Date</b>
	11:30 a.m.	5/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Dale Dakin - Owner	937-657-2622	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Angie Tipton, Class III WW	937-313-2280	
Name, Address and Title of Responsible Official	Phone Number	
Dale Dakin, Owner P.O. Box 613 Waynesville, OH 45068	937-657-2622	

Ohio EPA Inspector	Ohio EPA Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
9-16-2013 Date	9/16/2013 Date

Permit # : 1PV00113\*BD  
 NPDES # : OH0131806

Average Daily Design Flow:	<b>15,000 Gallons/Day</b>
Plant Serves:	71 mobile home lots (63 are currently occupied) and (3) 2-bedroom apartments
Average Daily Flow: (Period of Review):	<b>? - see discussion within the cover letter Gallons/Day ( )</b>
Method of flow monitoring:	<b>Water Meter for the park</b>
Type of alarms for plant:	<b>High level alarm for sand filter dosing tank</b>

**Pretreatment**

Type of Pretreatment: **Trash Trap**  
 Does the Trash Trap need pumped: **Yes**  
 Maintenance of pretreatment components is: **Fair**

**Comments/Status:**

The contents of the 2000-gallon trash trap was pumped out on July 18, 2013. Mr. Dakin acknowledged that it is due for another pump-out.

**Secondary Treatment  
(Aeration)**

Color of sludge: **Medium Brown**  
 Quality of Sludge: **Medium**  
 Foam: **None present**  
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Good**

**Comments/Status:**

Mr. Dakin currently has the aeration system blowers on a cycle of three hours "on" and one hour "off".

**Secondary Treatment  
(Settling)**

Clarity: **Clear**  
 Condition of Weir: **Clean**  
 Weir is level: **Yes**  
 Effluent in weir: **Clear**  
 Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Good**

**Comments/Status:**

**Tertiary Treatment**

	Yes	No		Yes	No
Surface sand Filters: <b>Slow</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Subsurface</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Good**

**Comments/Status:**

**Sludge Handling/Storage Disposal**

Hauler name: **Neals Septic Tank Service**  
 Disposal Site: **Clermont County Middle East Fork**  
 Sludge wasted from: **Aeration basin**  
 How often is sludge wasted: **Every 2-3 months**  
 Sludge drying beds: **No**                      Sludge holding tank: **No**

Overall maintenance of components is: **Good**

**Comments/Status:**

**Record Keeping/ Operator of Record**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... A
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. N
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)  

Hard bound
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
  - I. Identification of treatment works..... Y
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
    - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
    - ii. Laboratory results (unless documented on bench sheets)... Y
    - iii. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

**Comments/Status:**

The ORC should keep a separate log book for the water treatment system. Each book shall have numbered pages. A copy of the certificate should be kept within the ORC log book.

**Plant Discharge**

Discharge point is a: **Stream**  
Name of discharge point: **Little Miami River**  
Discharge is visible: **Yes**                      Quality of Effluent: **Clear**

**Comments/Status:**