



State of Ohio Environmental Protection Agency

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\*1IN0028120080731\*

MONTGOME COMMANDER-AERO

SARLE, EDWARD

2008/07/31

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

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State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249  
[www.epa.state.oh.us](http://www.epa.state.oh.us)

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korieski, Director

July 30, 2008

Mr. John Bosch  
Commander Aero  
10570 Springboro Pike  
Miamisburg, Ohio 45432

Re: Montgomery County, Commander Aero, Compliance Evaluation Inspection

Dear Mr. Bosch:

On July 8, 2008, I conducted a Compliance Evaluation Inspection at Commander Aero (NPDES Permit No. OH0133892; OEPA Permit No. 11N00281\*AD). Representing this facility was Scherry Diamond and Billy Sexton. The inspection was also conducted as part of the NPDES Permit renewal. A copy of my inspection report is enclosed.

The inspection report contained three marginal areas. The Permit section was rated marginal as a result of the submitting a late NPDES Permit renewal application. The Records / Reports section was rated marginal as a result of the failure to submit timely Monthly Operating Reports. The Self-Monitoring Program section was rated marginal as a result of the failure to monitor the discharges during November 2007 through April 2008 and to conduct the annual monitoring.

Finally, Commander Aero has an individual NPDES Permit addressing the storm water discharges from the site including the fuel storage area. An Industrial Storm Water General Permit is available for storm water discharges associated with transportation facilities such as airports. A copy of this general permit may be obtained at ([http://www.epa.state.oh.us/dsw/permits/GP\\_IndustrialStormWater.html](http://www.epa.state.oh.us/dsw/permits/GP_IndustrialStormWater.html)).

Commander Aero may seek coverage under the general permit instead of an individual NPDES Permit. The general permit currently does not have any storm water monitoring requirements. Commanded Aero would be required to comply with all conditions of the general permit including developing a Storm Water Pollution Prevent Plan. If Commander Aero wishes to proceed with this option, a Notice of Intent application along with a \$350 application fee would be required to be submitted to the Ohio EPA. A copy of this application may be obtained at (<http://www.epa.state.oh.us/dsw/storm/stormform.html>).

Please inform this office, in writing, by August 22, 2008 what actions Commander Aero will take in regard to the General Industrial Storm Water Permit. If Commander Aero wishes to renew the effective NPDES Permit, a revised NPDES Permit renewal application will be required to be submitted.



Mr. John Bosch  
July 30, 2008  
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If you have any questions, please call me at (937) 285-6096.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ned Sarle".

Ned Sarle  
Division of Surface Water  
Permits Section

Enclosure

cc: Scherry Diamond, Commander Aero



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
1IN00281*AD	OH0133892	7/8/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Commander Aero 10570 Springboro Pike Miamisburg, Ohio 45342	9:15 A.M.	10/1/2003
	Exit Time	Permit Expiration Date
	11:00 A.M.	9/30/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Scherry Diamond, Controller Billy Sexton, Line Service Manager	(937) 885-5580 ext. 13 (937) 313-6840	
Name, Address and Title of Responsible Official	Phone Number	
John Bosch, CEO 10570 Springboro Pike Miamisburg, Ohio 45342	(937) 885-5580	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
<i>Ned Sarle</i> 7/30/08	<i>Martyn G Burt</i> 7/31/08
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 1IN00281\*AD  
NPDES #: OH0133892

### Summary of Findings / Comments

The NPDES Permit renewal application was required to be submitted by April 1, 2008. Commander Aero submitted this renewal application on May 14, 2008. The submitted renewal application was also incomplete.

The City of Dayton leases this property to Commander Aero. A 10,000 and 12,000 gallon fuel storage tank is located in a spill containment area. A 300 gallon gas storage tank is also located within this area. This containment area has a concrete floor and concrete walls. A valve that is always shut off controls the discharge from this containment area. After each rain event, the water is checked for a sheen prior to opening the valve. The discharge from this containment area goes to an oil water separator prior to being discharge. Environmental Waste Oil hauls any oil collected in the separator.

Discharges from the fuel storage area are through outfall 001. The required wastewater samples are transported to Belmonte Park Labs to be analyzed. These samples are not placed in ice prior to being taken to the lab. For proper preservation, Commander Aero must immediately place these wastewater samples in ice after they are grabbed.

Belmonte Park Labs has been submitting the Monthly Operating Reports (MORs) for this facility. Many of these MORs were submitted late. For February 2007 through May 2008, no violations were reported. However, discharges were not reported for November 2007 through April 2008. Apparently, several discharges from the site did occur during this period. Finally, the NPDES Permit in Part II, Section E titled "Additional Pollutant Monitoring" required annual monitoring be conducted. Since the NPDES Permit became effective, Commander Aero has failed to monitor and report for these parameters.