



State of Ohio Environmental Protection Agency

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11G0001420080729

MONTGOME STEVENS AVIATION CO

WALBRIDGE, MATT 2008/07/29

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



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

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

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

July 29, 2008

RE: Compliance Evaluation/Permit Renewal Inspection and
Notice of Violation

Mr. Rusty Detrick
Stevens Aviation
PO Box 399
Vandalia, OH 45370

Dear Mr. Detrick:

On July 9, 2008 I met with you to inspect your facility's operations in preparation for renewing your NPDES permit. A review of your self-monitoring reports since your current permit became effective revealed that you have failed to monitor your facility's discharge in accordance with the terms and conditions of your permit. Specifically, you have failed to collect monthly samples of discharges caused by precipitation events and instead have reported 'AL - No Discharge for the Month' for every month since February 2003 except for May, July, and October 2003, May 2004, and September 2006. For those months, you typically only reported flow, oil and grease, inches of precipitation and pH while failing to monitor for Biochemical Oxygen Demand, Total Suspended Solids, Ammonia Nitrogen, Arsenic, Lead, Toluene, Benzene, Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and Xylene. Also, pH results were based on lab measurements instead of field measurements as required.

The monitoring frequency violations are a continuation of the findings of the previous inspection on August 13, 2002 which directed you to collect a sample within the first 30 minutes of discharge associated with a measureable storm event (greater than 0.10 inch). You indicated that you do not have a copy of your NPDES permit which likely does not help your ability to comply with its requirements. I offered to e-mail you a copy but you never e-mailed me an address to send it to after saying you would. I have attached a copy of the permit for your use.

Given that discharges very likely did occur during most every month, Stevens Aviation is in significant non-compliance with its NPDES permit and must take corrective actions immediately. It is necessary for you to explain why you did not conduct the required monitoring and what you will do to ensure proper monitoring will be done in the future. This explanation must be submitted by August 25, 2008.

It is necessary for Steven's Aviation to sign up to use Ohio EPA's electronic Discharge Monitoring Report (e-DMR) system for submission of monitoring data. This new web-based reporting system replaces SWIMware and is both simple and user-friendly. Information about how to establish an e-DMR account can be found on our website at: <http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>. Please make every effort to establish an account with this system as soon as possible but at least by October 1st when I expect your renewed NPDES permit to be effective.

Mr. Rusty Detrick
July 29, 2008
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During the inspection I was able to view the discharge of the well sump that is used to dewater the underground fuel tank containment pit. The discharge is conveyed through a hose across the surface onto the load rack pad that drains to the oil/water separator. I noted that the discharge had a slight odor of petroleum and that there was rust-colored staining on the concrete pad from the hose discharge to the catch basin. You indicated that you run the pump about once a week for a few hours. This source of wastewater is not identified in your NPDES permit application and certainly results in there being a discharge every month.

In reviewing your facility's files, I noted that the well sump was installed sometime in late 1995 or early 1996 and was intended to keep the containment pit empty of accumulated water. I believe that to accomplish this goal, the well pump needs to be operated automatically using a pressure transducer switch instead of being manually operated. It is necessary for you to provide a written response to this proposal with an indication of your plans to provide automatic operation of the pump. It would be ideal for the pump control system to record the elapsed time that the pump operates as a means for determining discharge volumes from the containment pit based on the pumping rate and elapsed run time.

Finally, I have enclosed your NPDES permit application Form 1 and 2C for you to sign and return. It is my intention to draft your NPDES permit renewal with a requirement that monitoring occur when there is a discharge from the oil/water separator. This can occur either because of a precipitation event or because of operation of the pit dewatering pump. Any comments regarding the draft permit should be directed to my attention.

If you have any questions concerning this letter or the inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Division of Surface Water

ATTACHMENT



Ohio Environmental Protection Agency

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
11G00014*CD	OH0071684	7-9-08	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
Stevens Aviation Co., Inc. 10683 Hangar Dr. Vandalia, OH 45377	1130	2-1-03
	Exit Time	Permit Expiration Date
	1205	1-31-08

Name(s) and Titles of On-Site Representative(s)	Phone Number(s)
Rusty Detrick	(937) 454-3451

Name, Title and Address of Responsible Official:	Phone Number
Rusty Detrick – Line Manager Stevens Aviation Co., Inc. PO Box 399 Vandalia, OH 45377	(937) 454-3451

Section C: Areas Evaluated During Inspection

(S = Satisfactory; M = Marginal; U = Unsatisfactory; NA = Not Applicable; NE = Not Evaluated)

M Permit	NE Flow Measurement	NA Pretreatment
U Records/Reports	NA Laboratory	NA Compliance Schedules
S Operations & Maintenance	S Effluent/Receiving Waters	NA Collection System
M Facility Site Review	NA Sludge Storage/Disposal	NA Other
U Self-monitoring Program		

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

Fuel trucks are filled approximately 2 to 3 times per week

The well sump is manually activated once a week for a couple of hours to dewater the containment pit (looked like about 10 gpm). This discharge is not sampled.

See inspection letter for more details

Name and Signature of Inspector(s)

Matt Walbridge

Agency / Office / Telephone

Ohio EPA / Southwest District Office / (937) 285-6095

Date

7-29-08

Name and Signature of Reviewer(s)

Martyn G. Burt

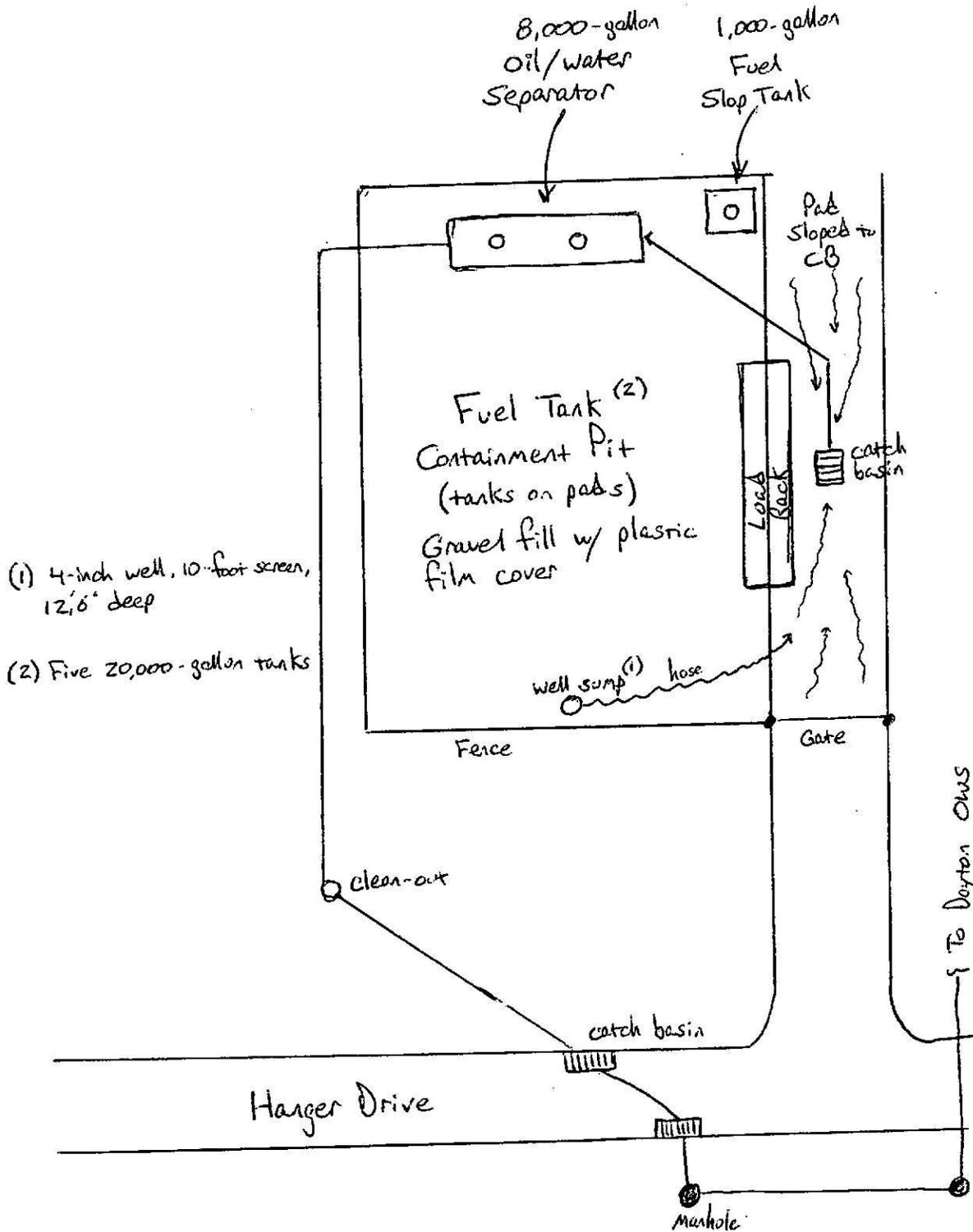
Agency / Office / Telephone

Ohio EPA / Southwest District Office / (937) 285-6034

Date

7/29/08

Stevens Aviation
 Site Diagram
 (from 7-9-08 inspection)



- (1) 4-inch well, 10-foot screen, 12'6" deep
- (2) Five 20,000-gallon tanks