



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director



\*1IG0002620100916\*

WARREN

ENTERPRISE REFINED PRODUCTS COMPANY  
LLC

PIEKUTOWSKI, MA

2010/09/16

**Environmental  
Protection Agency**

Tim Sinciani, Governor  
Lee Hulse, Lt. Governor  
Dana Kowalski, Director

September 16, 2010

Mr. John Coffman  
Enterprise Refined Products Company LLC  
Lebanon Terminal  
2700 Hart Road  
Lebanon, Ohio 45036

**Re: Enterprise Refined Products Co. LLC Lebanon Terminal -- OH0122823;  
1IG00026\*BD - CEI/Pre-Permit Inspection**

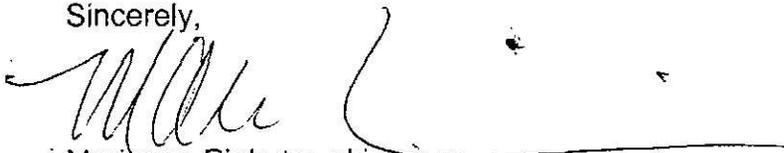
Dear Mr. Coffman:

On August 10, 2010, I met with Michael Churchill and Bryan Viviano to conduct a compliance evaluation inspection (CEI) and a pre-permit inspection at the Enterprise Refined Products Co. LLC Lebanon Terminal facility. The purpose of this inspection was to evaluate compliance with the terms of the NPDES permit, and to verify the information in the facility's NPDES renewal application. Please note that the report, by its format, tends to highlight negative areas.

As indicated on the attached NPDES Compliance Inspection Report, all areas that were evaluated received a satisfactory rating with the exception of the Self-Monitoring Program. This area received a rating of marginal. The reasons for this rating are included in the attached report.

Thank you and your staff for the time extended during the inspection. If you have any questions, please contact me at 937.285.6108.

Sincerely,



Marianne Piekutowski  
Environmental Specialist 2  
Division of Surface Water

Enclosures

Cc: Michael Churchill, Enterprise Refined Products  
Bryan Viviano, Enterprise Refined Products Lebanon Terminal





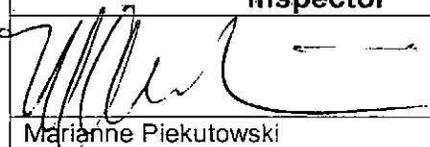
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IG00026*BD	OH0122823	8/10/2010	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Enterprise Refined Products Company LLC Lebanon Terminal 2700 Hart Road Lebanon, Ohio 45036	1:00 pm	10/1/2005
	Exit Time	Permit Expiration Date
	2:50 pm	9/30/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Michael Churchill, Sr. Environmental Specialist Bryan Viviano, Operations Technician	607.936.1014 513.933.4412	
Name, Address and Title of Responsible Official	Phone Number	
John Coffman, Lebanon Terminal Supervisor Enterprise Refined Products Company LLC 2700 Hart Road Lebanon, Ohio 45036	513.932.5886	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	M	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 report.	
Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date 9/16/10	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date 9/17/10



Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... N
- (b) Correct name and location of receiving waters..... Y
- (c) Do Categorical Standards apply?...If yes, list applicable standards.. N  

NA
- (d) Product(s) and production rates conform with permit application (Industries)..... Y
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... N
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

a) The new name is Enterprise Refined Products Company LLC. The name change paperwork was submitted in April 2010, and it has been changed in CORE.

d) The facility is in the process of bringing in ethanol.

f) There is an oil/water separator the goes out through a storm water pond to the creek. Oils are collected in a tank. One tank goes back to the product, and one goes in with the trans mix. There is also an aeration system associated with the office building.

**Section F: Compliance**

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... NA
- (c) Permittee is taking actions to resolve violations..... NA
- (d) Permittee has a compliance schedule..... NA
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... NA
- (g) Has biomonitoring shown toxicity in discharge since last inspection NA

Comments/Status:



**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

(a) Standby power available.....generator  or dual feed ..... NA

i. What does the back-up power source operate.....

NA

ii. How often is the generator tested under load.....

NA

(b) Which components have an alarm system available for power or equipment failures.....

NA

(c) All treatment units in service other than backup units..... NA

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

NA

(e) Any major equipment breakdown since last inspection..... NA

(f) Operation and maintenance manual provided and maintained..... NA

(g) Any plant bypasses since last inspection..... NA

(h) Any plant upsets since last inspection..... NA

Comments/Status:



**Section H: Sludge Management**

(a) Method of Sludge Disposal...

- Land Application
- Haul to Another NPDES Permittee
- Haul to a Mixed Solid Waste Landfill

NA

\*if one of the selected methods is land application, complete applicable charts.

**Class A - Exception Quality Sewage Sludge (monitoring station 584)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 - Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 - Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Gamma ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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**Class B Sewage Sludge (monitoring station 581)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 - Land Injection	Option 10 - Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (a) Has amount of sludge generated changed significantly since the last inspection..... NA
- (b) How much sludge storage is provided at the plant.....
- (c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... NA
- (d) Any complaints received in last year regarding sludge..... NA
- (e) 5/8" screen at headworks for facilities that land apply sludge..... NA
- (f) Are sludge application sites inspected to verify compliance with NPDES permit..... NA
- (g) Is a contractor used for sludge disposal..... NA  
 If so, what is the name of the contractor.....

**Comments/Status:**



**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary/Secondary flow measuring devices operated and maintained..... NA  
Type of device (e.g. weir with ultrasonic level sensor):  

Estimate the amount of storm water.
-------------------------------------
- (b) Calibration frequency adequate ..... NA  
(Date of last calibration: )
- (c) 24-hour recording instruments operated and maintained..... NA
- (d) Flow measurement equipment adequate to handle full range of flows..... NA
- (e) Actual flow discharged is measured..... NA
- (f) Flow measuring equipment inspection frequency  
Daily Weekly monthly other

**Comments/Status:**

Storm water ponds are valved shut. When ponds discharge, valve is opened.
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**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... NE
- (b) Parameters and sampling frequency agree with permit..... NE
- (c) Permittee uses required sampling method..... NE  
(see GLC page)
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... NE

**Comments/Status:**

Test America has been contracted to collect and analyze the samples for the facility. The chain-of-custody paperwork provided with the NPDES application data is inadequate. It is unclear if any type of QA/QC is done by Enterprise to ensure that samples are being taken and analyzed correctly. This is critical since the facility is signing that samples are representative and accurate. Because of this, the facility will receive a rating of Marginal for Self-Monitoring.
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**Section I: Self-Monitoring Program (con't)**

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... NE
- (b) Do SOP's include the following if applicable..... NE
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and Preservation
  - Interferences
  - Apparatus and Materials
  - Reagents
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. NE
- (d) If alternate analytical procedures are used, proper approval has been obtained..... NE
- (e) Analyses being performed more frequently than required by permit. NE
- (f) If (e) is yes, are results in permittee's self-monitoring report..... NE
- (g) Satisfactory calibration and maintenance of instruments/equipment. NE (see score from GLC page)
- (h) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: **pH, Oil & Grease**  
Lab name: **Test America**

*Discharge Monitoring Report Quality Assurance (DMRQA)*

- (a) Participation in latest USEPA quality assurance performance sampling..... NE  
Date:
- (b) Were any parameters "Unsatisfactory"..... NE
- (c) Reasons for "Unsatisfactory" parameters.....

NE

**Comments/Status:**



**Section J: Effluent/Receiving Water Observations**

**Outfall # 001**

Outfall Description: Valved discharge pipe from the second in a series of storm water ponds. There was no discharge on the day of the inspection.

Receiving Stream: Unnamed tributary to Turtle Creek.

Receiving Stream Description: The pond discharges into a drainage ditch on the company's property prior to entering waters of the State. There is no public access to this location.

**Outfall # 002**

Outfall Description: Valved discharge pipe from storm pond 003. There is an oil/water separator tributary to the pond. There was no discharge on the day of the inspection.

Receiving Stream: Unnamed tributary to Turtle Creek.

Receiving Stream Description: The pond discharges into a drainage ditch on the company's property prior to entering waters of the State. There is no public access to this location.

**Comments/Status:**

The facility has two septic tanks and leach lines. In addition, there is an aeration system that appears to discharge to leach lines next to outfall 001. I did not see a discharge from this system.

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities.....N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**



Permit # : 1IG00026\*BD  
NPDES #: OH0122823



# ● General Lab Criteria

Criteria	Standard Methods Requirement		Rating
<b>Balance</b>	Acceptable?		<b>NR</b>
• Standard Weights	• Either NIST Class S or ASTM/ANSI Class 1 weights <sup>1,2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Calibration verification required at least once each day the balance is used. <sup>3</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Cleanliness, air movement, vibration	• Cleanliness of balance is a must and air movement and vibration needs to be kept to a minimum <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Other	• Service and recalibrate annually (manufacturer representative or comparable) <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Must be able to measure to 0.1 grams <sup>4</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book maintained <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments :			
Criteria	Standard Methods Requirement		Rating
<b>Drying Oven (Suspended Solids)</b>	Acceptable?		<b>NR</b>
• Temperature Recordkeeping	• Temperature recorded with each use <sup>4</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book maintained <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Thermometer calibrated annually with NIST traceable thermometer <sup>1,2</sup> . Correction factor posted on thermometer / equipment <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Other	• Thermometer temperature in 0.5° C increments <sup>5</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Acceptable temperature range is 103° – 105° F <sup>4</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments :			



# General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>pH Meter</b>				
<ul style="list-style-type: none"> <li>• Calibration Frequency / Documentation</li> </ul>	<ul style="list-style-type: none"> <li>• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples)<sup>3</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>NR</b>
	<ul style="list-style-type: none"> <li>• Logbook maintained<sup>2</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> <li>• Minimum of 2 point calibration</li> </ul>	<ul style="list-style-type: none"> <li>• Calibration per manufacturer specification and calibration buffers must bracket anticipated result<sup>7</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> <li>• Slope Documentation / Acceptability</li> </ul>	<ul style="list-style-type: none"> <li>• Slope acceptable range indicated on benchsheet<sup>2</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> <li>• Buffer Expiration Date</li> </ul>	<ul style="list-style-type: none"> <li>• Buffers must not be expired</li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> <li>• Other</li> </ul>	<ul style="list-style-type: none"> <li>• Instrument manual available</li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> <li>• Teflon covered magnetic stirrer or equivalent for mixing<sup>8</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: : The facility contracts with Test America to test the pH. The facility should review the contract laboratory's sampling procedure to ensure it is being done correctly. It is the facility's responsibility to ensure the sampling date is representative, true, and accurate.

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>Dissolved Oxygen Meter</b>				
<ul style="list-style-type: none"> <li>• Calibration Method</li> </ul>	<ul style="list-style-type: none"> <li>• Air or known DO calibration method<sup>10</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>NR</b>
	<ul style="list-style-type: none"> <li>• Calibration per manufacturer specification<sup>10</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> <li>• Calibration Frequency / Documentation</li> </ul>	<ul style="list-style-type: none"> <li>• Logbook maintained<sup>2</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> <li>• Calibration verification required at least once each day the meter is used.<sup>3</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> <li>• Other</li> </ul>	<ul style="list-style-type: none"> <li>• Small to no bubble present under membrane (must be smaller than the lead in number 2 pencil)<sup>11</sup></li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> <li>• Instrument manual available</li> </ul>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:



# General Lab Criteria

Criteria	Standard Methods Requirement		Rating
<b>Incubator (CBOD/ E-Coli)</b>	Acceptable?		<b>NR</b>
• Temperature Recordkeeping	• Temperature checked / recorded twice daily for each shelf in use <sup>1</sup> (E-Coli)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Temperature checked / recorded daily <sup>2</sup> (CBOD)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Acceptable temperature range (CBOD) is 20° C ±1.0° <sup>12</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Acceptable temperature range (E-Coli) is 35° C ±0.5° <sup>22</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Logbook maintained <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer <sup>1,2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Temperature correction information posted on incubator <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• E-Coli can use multiple tubes (five 20 ml or ten 10 ml), or mfg's multi-well tray	• E-coli Ultraviolet lamp (365 nm wave length, 6 W bulb) <sup>23</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Other	• Instrument manual available	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Temperature Log (thermometer reads to 0.5 Celsius). <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments: :

Criteria	Standard Methods Requirement		Rating
<b>Refrigerator</b>	Acceptable?		<b>NR</b>
• Temperature Recordkeeping	• Temperature Log (thermometer reads to 0.5 Celsius). <sup>5</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer <sup>1,2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Other	• Thermometer held in water bath. <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Refrigerator temperature ≤6° Celsius. <sup>13</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Do not store volatile solvents, food, or beverages. <sup>14</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments:



# General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>Chlorine Meter</b>				
• Calibration Frequency / Documentation	• pH / millivolt meter read to 0.1 mV <sup>15</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>NR</b>
	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) <sup>3</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Method	• Calibration using three iodate solutions 0.2, 1.0, 5.0 milliliters or calibration per manufacturer specification <sup>16</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Calibration curve (acceptable slope)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained. <sup>2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments: :				

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>Ammonia Meter</b>				
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) <sup>3</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>NR</b>
	• Log book being maintained <sup>2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope acceptability	• Verify calibration slope is acceptable (per mfg. spec.).	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Method	• Standards used for calibration (3 ammonia solutions of 10 mg/l, 1 mg/l, and 0.1 mg/l) or per mfg. spec. <sup>17</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing <sup>18</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments: :				



# General Lab Criteria

Criteria	Standard Methods Requirement		Rating
<b>Sample Collection/Handling</b>	Acceptable?		<b>NR</b>
• Sample Labeling	• Samples container labeled (description, date, time, preservative added, initialed). <sup>19</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Chain of Custody	• Chain of custody (description, date, time, signature). <sup>19</sup>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
• Other	• Composite samples refrigerated during sample collection <sup>14</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Equipment blanks utilized <sup>14</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• SOP for cleaning of sampling equipment	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Logbook being maintained <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments: The chain-of-custody documentation is not acceptable. There are times in the chain-of-custody where the sample possession cannot be documented. In addition, it is unclear what preservatives are used for which parameter. The facility should evaluate the QA/QC procedure used by the contract lab for sample collection and handling.

Criteria	Standard Methods Requirement		Rating
<b>Desiccator</b>	Acceptable?		<b>NR</b>
• General criteria	• Properly working seals.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Desiccant fresh (blue color)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Documentation	• Log book being maintained <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement		Rating
<b>Bench sheets</b>	Acceptable?		<b>NR</b>
• General criteria	• Date(s) <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Analyst initials <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Blue or black ink pen <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Calibration information <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Equations, calculations, units for all measurements, notations, and results present <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Corrections, single line through, initialed and dated <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments:



# General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>Hot Water Bath (Fecal Coliform/E. Coli)</b>				<b>NR</b>
• Temperature Recordkeeping	• Temperature Log (thermometer reads 0.2° C) <sup>21</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Incubator temperature 44.5° C ± 0.2° <sup>21/24</sup>			
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer <sup>1,2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained <sup>2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Water Level	• Thermometer total immersion or partial (line on thermometer to ID immersion depth) <sup>1,5</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>Autoclaves/Steam Sterilizers</b>				<b>NR</b>
• All apparatus utilized is adequately sterilized before use	• Sterilizing temperature 121° C <sup>25</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• 10 to 30 minutes time based on material being sterilized <sup>26</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Documentation	• Verify the autoclave temperature weekly by using a maximum registering thermometer (MRT) to confirm that 121°C has been reached as measured in the exhaust. <sup>1</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Date, contents, sterilization time and temperature, total time in autoclave, and analyst's initials should be recorded each time the autoclave is used <sup>1</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer <sup>1,2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained <sup>2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Performance Checks	• Test monthly for efficacy using a biological such as commercially available <i>Geobacillus stearothermophilus</i> in spore strips, suspensions, or capsules <sup>1</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:



# General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?	Rating
<b>Final Effluent Temperature Monitoring</b>			
• General Criteria	• Thermometer calibrated annually with NIST traceable thermometer <sup>1,2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<b>NR</b>
	• Thermometer reads in increments of at least 0.1° C <sup>5</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book being maintained <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments:			
<b>Number of Criteria Rated:</b>			
			Acceptable
			Marginal
			Unacceptable
			Total Number of Areas Rated
<p><b>Acceptable Ratings</b> – No action required (recommend SOP's written or updated, perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, written response not required).</p>			
<p><b>Marginal Ratings</b> – Improvements required, written response required (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response).</p>			
<p><b>Unsatisfactory Rating</b> - Improvements required, written response required, NOV issued (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response to NOV).</p>			
<p>Consider recommending PAI Audit from DES when:</p>		<p>&gt;60% of ratings are Marginal &gt;45% of ratings are a combination of Marginal or Unacceptable &gt;30% of ratings are Unacceptable</p>	

## Notation of Referenced Method

- |                            |                              |
|----------------------------|------------------------------|
| 1 Method 9020-B, Item 3    | 14 Method 1060A, Item 1      |
| 2 Method 1020-A, Item 1    | 15 Method 4500-CI I, Item 2  |
| 3 Method 1020-B, Item 10   | 16 Method 4500-CI I, Item 4  |
| 4 Method 2540-B, Item 2    | 17 Method 4500-NH3 D, Item 4 |
| 5 Method 2550-B, Item 1    | 18 Method 4500-NH3 D, Item 2 |
| 6 Method 1020-A, Item 1    | 19 Method 1060-B, Item 2     |
| 7 Method 4500-H B, Item 4  | 20 Method 1060-B, Item 1     |
| 8 Method 4500-H B, Item 2  | 21 Method 9222D, Item 1      |
| 9 Method 1020-B, Item 2    | 22 Method 9223 B, Item 2     |
| 10 Method 4500-O B, Item 3 | 23 Method 9223 B, Item 3     |
| 11 Method 4500-O G, Item 3 | 24 Method 1603, Item 2       |
| 12 Method 5210-B, Item 5   | 25 Method 9030-B, Item 3     |
| 13 CFR 136.3, Table II     | 26 Method 9020 B, Table IV   |



# General Lab Criteria

Equipment Logbook Content - all maintenance performed on a piece of equipment should be documented in the logbook. This should include parts replacement and routine maintenance activities. Entries should include date, maintenance performed and initials of person making entry.

## Preservation and Holding Times

Parameter	Container	Min. Sample Size (mL)	Sample Type	Preservation	Maximum Storage Time	
					Recommended	Regulatory
BOD / CBOD	P, G	1000	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	6h	48h
TSS	P, G	200	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 d
pH	P, G	50	G	Analyze immediately	0.25h	0.25 h
NH3-N	P, G	500	G, C	Analyze as soon as possible or add $\text{H}_2\text{SO}_4$ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	28 d
TRC	P, G	500	G	Analyze immediately	0.25h	0.25 h
DO (electrode)	G, BOD Bottle	300	G	Analyze immediately	0.25h	0.25 h
Temperature	P, G	--	G	Analyze immediately	0.25h	0.25 h
Metals, general	P, G	1000	G, C	For dissolved filter immediately and add $\text{HNO}_3$ to pH <2	6 months	6 months
Purgeables by purge and trap	G (PTFE lined lid)	40 (X2)	G	HCl to pH<2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	14 d
Base/Neutrals and acids	G (solvent rinsed or baked)	1000	C, G	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Pesticides	G (PTFE lined lid)	1000	C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Fecal Coliform / E-Coli	G, P (Sterilized)	100	G	Refrigerate $\leq 10^{\circ}\text{C}$ If chlorine present, add sodium thiosulfate tablet	6 hrs transport Start analysis within 2 hrs of receipt in lab.	
Oil and Grease	G	1000	G	HCl or $\text{H}_2\text{SO}_4$ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	28 d	28 d

## Approved Standard Methods

CBOD / BOD 5 Day	Std Methods 5210-B
Ammonia, Selective Electrode Method	Std Methods 4500-NH3 D
Total Residual Chlorine, DPD Colorimetric Method	Std Methods 4500-Cl G
Total Suspended Solids, Dried at 103-105 °C	Std Methods 2540-D
Dissolved Oxygen, Membrane Electrode Method	Std Method 4500-O G
pH, Electrometric Method	Std Methods 4500-H+ B
Fecal Coliform, Membrane Filter Procedure	Std Methods 9222D
Escherichia Coli, Enzyme Substrate Test	Std Method 9223B
Escherichia Coli Membrane Filtration Procedure	EPA Method 1603
Oil and Grease	USEPA 1664A or Std Methods 5520B
Metals, general	USEPA 200, Std Methods 3111B or C, or 3120B
Volatiles (Purgeables by purge and trap)	USEPA 6210, Std Methods 624
Semi-Volatiles (Base/Neutrals and acids)	USEPA 6410, Std Methods 625
Pesticides	USEPA 6410 and 6630, Std Methods 608



**ENTERPRISE REFINED PRODUCTS COMPANY LLC  
LEBANON TERMINAL  
NPDES COMPLIANCE EVALUATION/PRE-PERMIT INSPECTION  
DATE OF INSPECTION: August 10, 2010**

ITEMS FOR DISCUSSION:

The facility submitted its renewal application as required. However, it went to our Central Office instead of the district office. The application was found. After review, it was not a complete application, and additional sampling data was needed. Since the time of the inspection, the facility has completed the required sampling and has provided this information to Ohio EPA. An original signature is still needed for Item V on Form 2F. A photocopied signature has been provided. In addition, the on-site sewage systems need to be shown on the site plan. There are the two septic tanks with leach lines and one aeration system.

COMPLIANCE EVALUATION:

The only compliance item noted after reviewing the facility's sampling data was a missed pH sample in December 2006. One sample was expected, and none were submitted. This will serve as the enforcement for this item.

OBSERVATIONS:

Enterprise Refined Products Company LLC (Enterprise) has storage tanks for jet fuel A, JP-8, premium unleaded gasoline, regular unleaded, low sulfur diesel, ultra low sulfur diesel, kerosene and trans-mix storage. The terminal is in the process of bringing in ethanol also. The terminal does not own the product in the transmission lines. The permit covers storm water discharges from the secondary containment areas, drum racks, manifold French drain system, and oil/water separator discharges.

The discharges to waters of the State are from storm water retention ponds. The ponds are normally valved closed. This would allow the facility to capture any material that may be spilled. A visual inspection is done prior to opening the valves. There was no discharge on the day of the inspection.

The outfalls for the facility are on tributaries on private property. There is no access by the public to the outfalls. Because of this, outfall signage will not be required at the current time. However, if the site does become accessible, then signage would be required at that time.

Test America has been contracted to do all of the sampling for Enterprise's NPDES permit. As part of the NPDES permit application, Enterprise provided a copy of the chain-of-custody and sampling documentation from Test America. The documentation from Test America was not acceptable. There is a period of two hours and forty-five



## **ENTERPRISE REFINED PRODUCTS COMPANY LLC – Page 2**

minutes when the sample is not in custody. In addition, the type of preservative used for a parameter is not clear. It is Enterprise's responsibility to ensure their self-monitoring data is representative, true and accurate. Because of this, Enterprise is receiving a rating of Marginal for its Self-Monitoring. The facility should develop an audit procedure for its contract laboratories and the quality assurance/quality control. The issue of maintaining signed copies of the eDMRs on-site was discussed during the inspection. I have not been able to resolve this issue. The facility must be able to access its sampling data when requested. This will be addressed in the future.

There is an aeration system between the warehouse and storm water retention pond at outfall 002. It was unclear if the system was still being used, if it had a discharge, and how often it was pumped. It appears to go to leach lines, but is not known. There are two other septic tanks with leach lines at the facility for the sanitary flows. All of these systems should be placed on a maintenance schedule to ensure they are pumped and maintained on a regular basis. The potable water for the facility is from the City of Lebanon.

There are two oil/water separators at the facility. One is located by the garage at the southern end of the facility, and appears to be tributary to retention pond three that discharges from outfall 002. The other separator is located east of the loading and additive tanks, and appears to be tributary to retention ponds one and two. They discharge from outfall 001. The discharge from these separators needs to be sampled. As part of the renewal permit, two internal monitoring stations will be added to collect quarterly samples from these separators.

### **ITEMS REQUIRING ACTION**

Enterprise Refined Products should develop an audit procedure for its contract laboratories to ensure the sampling data is correct and accurate. The facility is certifying the data is true and accurate.

Enterprise Refined Products must determine if its contract laboratory is collecting and analyzing its samples correctly. The pH must be taken in the field. The pH meter must be calibrated with a minimum two point calibration. The Oil and Grease samples must be taken as a grab sample. The enclosed "General Laboratory Criteria" form can be used to ensure samples are being collected and analyzed in accordance with 40 CFR 136.

Enterprise Refined Products must determine if the aeration system located next to the warehouse building discharges to water of the State or to leach lines. If the system does have a discharge to waters of the State, then you must apply for coverage under the NPDES permit for the discharge.

