OhioEPA
State of Ohio Environmental Protection Agency

Southwest District
401 East Fifth Street
Dayton, Ohio 45402-2911
TELE: (937)285-6357 FAX: (937)285-6249
www.epa.state.oh.us

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

May 1, 2009

Mr. Mike Kitter
Conveylt, Inc
532 Green Street
New Haven, Indiana 46774

RE: Complaint Investigation, Clark County Salt Pile, NPDES permit #1GR00664

Dear Mr. Kitter:

The Ohio EPA recently became aware of groundwater contamination issues related to the presence of a large stockpile of salt managed by your company. The pile is managed on property Convey It, Inc. leases from CSX Railroad, located off Tremont City Road, in Moorefield Township, north of Springfield, Ohio. The salt is sold to private contractors and is used for wintertime snow and ice control.

Coverage under an Ohio EPA industrial stormwater discharge permit was renewed in September, 2006. Based on our April 7, 2009, telephone conversation, Convey It, Inc., had never developed a "Stormwater Pollution Prevention Plan (SWP3)", as the permit requires, and explaining how runoff from the site will be managed to minimize negative impacts to the surrounding area. On April 13, 2009, I received from you via electronic mail a map/diagram of the site in question, and a 2 page explanation of salt handling practices now employed at the site.

On April 14, 2009, during a moderate rain, I inspected the site to determine the direction of flow of stormwater runoff, to determine salinity levels of the runoff, and to collect samples of the water. Greg Buthker from Ohio EPA's Water Quality group accompanied me during this visit, and the following observations were made:

1. Runoff from the pile is mainly to the east, leaving the asphalt pad at the fence line and flowing into an adjacent low lying wooded area. (The property is owned by Navistar.) Boundaries of the area receiving the runoff are visibly defined by the presence of standing dead trees, and a complete lack of understory vegetation. After leaving the asphalt pad, runoff quickly soaks into the ground, passing through perhaps a foot of topsoil before entering a highly productive groundwater aquifer system associated with the Mad River.

2. The only place where any kind of constructed berm was observed was directly adjacent to the eastern edge of what remains of the salt pile, near the concrete load ramp. (A small stretch of remnant berm was observed a short distance south of the pile, paralleling the fence line.) Chunks of salt were observed to

The following document has not been transmitted. Please try again.
Try to retransmit the rest of pages.

(WED) SEP 21 2011 15:34

User/Account :
DESTINATION : SCAN

DOCUMENT# : 7527431-157
TIME STORED : SEP 21 15:28
TX START : SEP 21 15:28
DURATION : 28min.54sec
COM.MODE : HDD

PAGES : 0page
RESULT : EF08D1

New Permit File

Application No. OH0020141

Issue Date: May 8, 2006

Effective Date: June 1, 2006

Expiration Date: May 31, 2011

Attachment – A

RECEIVED
OHIO EPA
MAY 08 2006
SOUTHWEST DISTRICT

Ohio Environmental Protection Agency
Authorization to Discharge Under the
National Pollutant Discharge Elimination System

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq., hereinafter referred to as the "Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111),

Village of Glendale

is authorized by the Ohio Environmental Protection Agency, hereinafter referred to as "Ohio EPA," to discharge from the Village of Glendale wastewater treatment works

have breached the berm near the concrete load ramp, possibly due to excessive steepness of the pile. South of the pile where salt has been compacted against the pad by heavy equipment, no barrier of any kind was observed, though it's possible the limestone "pad" installed prior to the pile being built up has been mixed into the smashed salt. There is nothing to prevent rainwater from coming into contact with this material, nor is there any kind of viable barrier present to pond salt laden runoff and keep it on the site.

3. The remaining berm observed at the north end of the pile (near the concrete load ramp) did not appear to have created a "semi-hard barrier" (as described in the SWP3) capable of stopping water from flowing through it. Likewise, placing limestone "sand" over the pre-existing asphalt before building the salt pile is probably ineffective at preventing salt-laden stormwater from soaking into the ground, especially if the integrity of the asphalt has never been assessed. In general, a berm composed of porous sand-like material does not seem well suited to the task of stopping the flow of runoff. Sand is simply too porous to hold water.

4. Specific conductance of the runoff was measured in the field, and translating figures obtained from the conductivity meter into an amount of salt present in the water shows the runoff to be roughly 10 percent brine, or more than 100,000 parts per million salt. Water quality standards, by comparison, limit discharges to a maximum of 1500 parts per million salt.

5. No cover of any kind was observed to be in place over the inactive part of the pile. While its size is greatly diminished this time of year, at the time of this inspection it looked like there was still enough salt present beyond the pile's "working face" to justify a cover. The remnants of a cover were not observed to be present at the site.

Based on my observations, this site is in violation of the following portion of the Ohio Revised Code (ORC):

ORC 6111.04 - Water Pollution Violations Prohibited
Part A(1) of this section of the law states that "No person shall cause pollution or place or cause to be placed any sewage, sludge, sludge materials, industrial waste, or other wastes in a location where they cause pollution of any waters of the state."

Stormwater runoff that comes in contact with the salt pile creates a brine solution that can be considered "**other waste**" { **defined in ORC 6111.01(D)**}. If contained and appropriately managed, this material could have commercial value since many highway departments now apply brine to roads prior to the arrival of winter storms. Conveylt,

The following document has not been transmitted. Please try again.
Try to retransmit the rest of pages.

(WED) SEP 21 2011 15:07

User/Account :
DESTINATION : SCAN

DOCUMENT# : 7527431-156
TIME STORED : SEP 21 13:41
TX START : SEP 21 14:59
DURATION : 22min.17sec
COM.MODE : HDD

PAGES : 0page
RESULT : EF08D1

Matrix, LLC

:lient:
Inited Dairy Farmers
:tore 006
:orner Routes 131 & 132
Villiams Corner, Clermont County

Log No: 00-01
Sample Collected: 1/17/00
Analysis Reported: 1/28/00
Sampled By: CKG/TMG
Page 1 of 1

REPORT OF RESULTS

og No.	Sample Description, Liquid samples
0-01-001	Influent Sample Port
0-01-002	Effluent Sample Port #1
0-01-003	Effluent Sample Port #2

	Date/Time	Detection	Analyzed

however, currently deals exclusively with rock salt, and allows the brine that forms from contact with rainwater to flow off the property as waste.

"**Waters of the state**" is defined to include "...accumulations of water, surface and underground, natural or artificial, regardless of the depth of the strata in which underground water is located, that are situated wholly or partly within, or border upon, this state, or are within its jurisdiction, except those private waters that do not combine or effect a junction with natural surface or underground waters." **{See ORC 6111.01(H)}**

The property on which the salt pile in question is managed is located over the Mad River buried valley aquifer, an important source of groundwater in the area. It is considered a "sole source" aquifer, which U.S. EPA defines as the sole or principal source of drinking water that, if contaminated, could pose a threat to public health. Because of the highly porous nature of the sands and gravels that comprise the aquifer, anything spilled on the ground may quickly make its way into groundwater.

Analytical results of water samples recently taken by the Clark County Combined Health District from a drinking water well located roughly one thousand feet west of the salt pile confirmed the presence of elevated levels of both sodium and chloride. (A copy of the sample results has been included with this letter.) The well, once used by Clark State's Truck Driving Training Institute, has been rendered unusable because contaminant levels far exceed drinking water standards.

The City of Springfield's drinking water system utilizes a system of groundwater wells located about 3 miles south of the salt pile. While there is no evidence of impact to these wells, groundwater in the area of the salt pile moves generally south and west, in the direction of the city's wellfield. Another smaller public water system, along with several private wells, also exists in the area, and could be affected by the plume of contaminated groundwater created by runoff from the salt pile. No evidence exists suggesting that contamination has occurred in these other wells, but some have been recently sampled and analytical results are pending.

Conclusions

Conveylt, Inc. needs to drastically change its salt handling practices to prevent continued contamination of groundwater in the area. Three options exist which could remedy the situation:

1. Covering the pile at all times, and figuring out how to capture runoff during periods when salt is being off-loaded at the site, then loaded out in trucks.
2. Installing on the property a system of pipes and small basins or ponds that will effectively capture and contain salt-laden stormwater runoff, preventing its flow into the underlying aquifer.

The following document has not been transmitted. Please try again.
Try to retransmit the rest of pages.

(WED) SEP 21 2011 14:59

User/Account :
DESTINATION : SCAN

DOCUMENT# : 7527431-155
TIME STORED : SEP 21 13:41
TX START : SEP 21 14:45
DURATION : 20min.05sec
COM.MODE : HDD

PAGES : 0page
RESULT : EF08D1

ATTACHEMENT E

LABORATORY RESULTS

3. Finding another location at which to store salt where it will be easier to control and manage runoff.

If Conveyit chooses to remain at the site, it will have to provide significantly more information within its Stormwater Pollution Prevention Plan. Within 60 days of receipt of this letter, please provide the following information:

1. How salt will be unloaded from rail cars and moved into the pile;
2. How the covering system will be put in place and maintained;
3. How the new berm system will be constructed and maintained, and how runoff water will be managed if a large storm produces more rainfall than the containment system can hold;
4. How runoff will be ponded and kept on the site, particularly during periods when the pile is being built up, and when the working face is active.

If you have questions about anything in this letter, please contact me at (937) 285-6442 or via email at chris.cotton@epa.state.oh.us.

Sincerely,

Chris Cotton
Division of Surface Water

Ec: Dan Chatfield, Clark County Combined Health District
Ellis Dewell, City of Springfield Water Treatment Plant Superintendent
Allison Reed, OEPA/SWDO/DDAGW
Bob Moore, OEPA/SWDO/DDAGW
Jeff Davidson, OEPA/SWDO/DDAGW
Tya Darden, OEPA/SWDO/DDAGW
Bill Fischbein, OEPA Legal
Tim McDaniel, Navistar
Mark Luginbill, Navistar

Cc: Bob Mounts, Moorefield Township Trustees

CC/plh

The following document has not been transmitted. Please try again.
Try to retransmit the rest of pages.

(WED) SEP 21 2011 14:45

User/Account :
DESTINATION : SCAN

DOCUMENT# : 7527431-154
TIME STORED : SEP 21 13:40
TX START : SEP 21 14:37
DURATION : 18min.47sec
COM. MODE : HDD

PAGES : 0page
RESULT : EF09D1

GOULDS PUMPS
ITT Industries

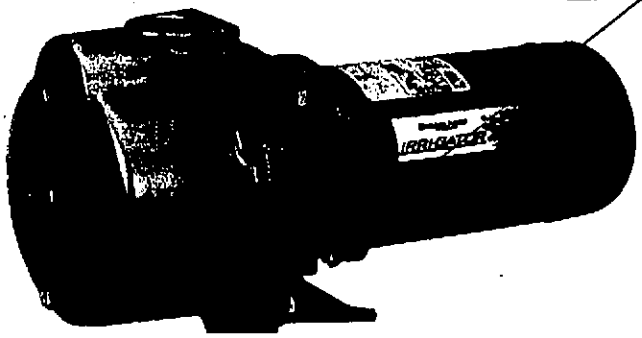
Water Technologies
Seneca Falls, NY 13148

Installation, Operation and Maintenance Instructions

IRRI-GATOR™

Self Priming Model

GT



Safety Instructions

TO AVOID SERIOUS OR FATAL PERSONAL INJURY OR MAJOR PROPERTY DAMAGE, READ AND FOLLOW ALL SAFETY INSTRUCTIONS IN MANUAL AND ON PUMP.

This is a **SAFETY ALERT SYMBOL**. When you see this symbol on the pump or in the