



Environmental  
Protection Agency

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

**FILE COPY**

March 7, 2011

Mr. Gary Spanner  
5800 Griffiths Lane  
Powell, OH 43065

**Re: 4PY00006 / OH0121355  
Countryside MHP  
Reconnaissance Inspection**

Dear Mr. Spanner:

On February 22, 2011, a Reconnaissance Inspection was conducted for the Countryside MHP wastewater treatment plant (WWTP). Present for the inspection were Bob Gomez, the operator of record, Mike Sadler, an operator, Walter Burke, the manager, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. **There have effluent violations and no response to the previous inspection report dated June 14, 2010. Therefore, this report also serves as a Notice of Violation of your wastewater discharge permit for this facility.**

Attached is the Reconnaissance Inspection Report. There are a few items which require a written response. **Please respond in writing within 30 days of the receipt of this letter.**

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846.

Sincerely,

Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

CM/nsm Countryside Recon 2-22-11

Central District Office  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

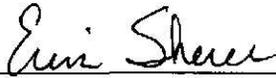
614 | 728 3778  
614 | 728 3898 (fax)  
www.epa.ohio.gov

## NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4PY00006	OH0121355	2/22/11	R	M	1

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Mr. Gary Spanner dba Countryside MHP WWTP P.O Box 42 Amlin, Ohio 43002	10:30 AM	9/1/07
	Exit Time	Permit Expiration Date
	11:00 AM	8/31/12
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bob Gomez, Operator of Record Walter Burke, MHP Manager Mike Sadler, Operator	(513) 755-8050 (614) 209-6308	
Name and Title of Responsible Official	Phone Number	
Gary Spanner, Owner 5800 Griffiths Lane Powel, Ohio 43065	(614) 764-2222	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
S	Records/Reports	
M*	Operations & Maintenance	Two of the three sand filters were ponded. The flows from the splitter box were different.
S	Facility Site Review	
M	Collection System	The peak flow rate in 2010 was twice the designed flow rate.
S	Flow Measurement	
N	Laboratory	
S	Effluent/Receiving Waters	
S	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Signatures			
	3.7.11		2.25.11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

## Summary of Findings and Comments Countryside MHP

### General

The sewage treatment plant serving the Countryside MHP consists of a trash trap, flow equalization, two parallel 9000 GPD treatment trains which include two 4500 gallon aeration tanks and a dual hoppers clarifier. From the clarifiers, wastewater flows to a dosing tank where it is pumped to one of three sand filter beds. Effluent from the sand filters will flow through ultraviolet disinfection before discharging into a storm sewer which leads to Hayden Run. A sludge holding tank is provided for wasting and improving plant functions.

1. At the time of the inspection, the following general observations were made with the operation and maintenance of the plant:
  - a. Two of the sand bed filters were ponded. The third sand filter will be placed into service once it is dried and raked. New sand will be added to the beds soon. **Please inform this office when the sand filters are operational.**
  - b. The splitter box to the aerators produced different flows. This should be fixed to provide similar treatment to each treatment train. **Please inform this office when the flows from the splitter box are the same.**
  - c. Dissolved oxygen and pH are tested on-site.
2. The attached table contains a list of NPDES permit violations for the time period between May 2010 and February 2011. The second table summarizes flow between January 2010, and February 1, 2011. The peak flow was over twice the design rate. The facility will likely benefit from inflow and infiltration work.

The most recent Reconnaissance Inspection was done by Jan Rice on May 25, 2010. In his June 14, 2010, report, an update regarding progress with evaluating the collection system in order to locate and remove inflow and infiltration sources was requested. To date, this office has not received a response. **Please respond, in writing, what progress has been made towards eliminating inflow and infiltration.**

3. The effluent from the ultra violet tank looked clear. The outfall was not investigated.

Countryside Effluent Violations Since May 2010					
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2010	Dissolved Oxygen	1D Conc	6.0	4.9	5/18/2010
June 2010	Dissolved Oxygen	1D Conc	6.0	3.6	6/8/2010
June 2010	Dissolved Oxygen	1D Conc	6.0	4.9	6/15/2010
December 2010	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.5	12/1/2010

Countryside Flows since Jan. 1, 2010		
	Flow (mgd)	Date
Highest flow	0.041	12/1/2010
Second highest flow	0.034	6/3/2010
Average	0.011	

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PY0000920110913\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



Environmental  
Protection Agency

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

FILE COPY

September 13, 2011

Harold Lynn, Owner  
Country Hills MHP  
262 Valley Boulevard NE  
Newark, OH 43055

**Re: Country Hills MHP  
NPDES Permit 4PY00009/ OH0131041  
Reconnaissance Inspection  
Licking County**

Dear Mr. Lynn:

On August 16, 2011, a Reconnaissance Inspection was conducted at the Country Hills MHP. Present for the inspection were you, Tammi Gall, the operator of record, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

**Findings:**

1. Attached are effluent violations which occurred between January 2006 and July 2011. This office has received adequate response for each occurrence and no additional comment is required
2. The plant appeared to be operating well and the effluent was clear during the inspection.

Attached is the Reconnaissance Inspection Report which requires no written follow-up. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,

Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

CM/nsm 8-16-11 Country Hill Recon Cover Letter

Central District Office  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

614 | 728 3778  
614 | 728 3898 (fax)  
[www.epa.ohio.gov](http://www.epa.ohio.gov)

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PY00009	OH0131041	RI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliant
8/16/2011	2:10 PM	2:30 PM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Country Hills MHP	5/1/2009
	Permit Expiration Date
	4/30/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Tammy Gall, Operator	(740) 403-4519
Name and Title of Responsible Official	Phone Number
Harold Lynn, Owner	(740) 763-3539

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
S	Receiving Waters	
N	Laboratory	

Comments:

Signatures	
<i>Cole Miller</i> 8/31/11	<i>Erin Sherer</i> 9/2/11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

## Compliance Data for Country Hills MHP between 1/1/2006 to 7/1/2011

### Summary

Permit Effluent Limit Violations: 4  
 Permit Effluent Code Violations: 0  
 Permit Effluent Frequency Violations: 3  
 Compliance Schedule Violations: 0

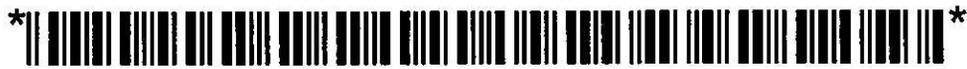
Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2006	001	Fecal Coliform	7D Conc	2000	6400.	7/1/2006
August 2007	001	Chlorine, Total Residu	1D Conc	0.038	.05	8/21/2007
April 2011	001	CBOD 5 day	30D Conc	10	12.	4/1/2011
June 2011	001	Chlorine, Total Residu	1D Conc	0.038	.06	6/14/2011

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2007	001	Color, Severity	1/Day	1	0	03/25/2007
March 2007	001	Odor, Severity	1/Day	1	0	03/25/2007
March 2007	001	Turbidity, Severity	1/Day	1	0	03/25/2007

Flow Data for Country Hills MHP between 1/1/2006 and 7/1/2011

	Date	Flows (MGD)
Ten Highest Flows	1/1/2006	0.008
	1/2/2006	0.008
	1/3/2006	0.008
	1/4/2006	0.008
	1/5/2006	0.008
	1/6/2006	0.008
	1/7/2006	0.008
	1/8/2006	0.008
	1/9/2006	0.008
	1/10/2006	0.008
<b>Average Flow Rate</b>		0.006

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4IN0006520110421\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



Environmental  
Protection Agency

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

April 21, 2011

Gregory L. Garrison  
Marathon Petroleum Company  
4125 Fisher Road  
Columbus, OH 43228

Re: **Marathon Petroleum Company**  
**NPDES Permits**  
**Marathon Columbus East Terminal 4IN00020 / OH0029041**  
**Marathon Columbus Central Terminal 4IN00062 / OH0070629**  
**Marathon Columbus West Terminal (4IN00065) OH0070661**  
**Reconnaissance Inspections**

Dear Mr. Garrison:

On April 12, 2011, Reconnaissance Inspections were conducted for the permitted outfalls at three Marathon terminals located on Fisher Road in Columbus, Ohio. Present for the inspection were Greg Garrison and Amber Moser representing Marathon and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

**Findings:**

1. **Best Management Practices (BMPs):** The Columbus East terminal's permit includes a condition which requires Marathon to follow the BMPs submitted in 1997. Marathon personnel requested to follow standardized BMPs. Ohio EPA finds this acceptable as long as a copy is submitted. **Please submit the standardized BMPs to Ohio EPA.**
2. **Columbus Central and West Outfalls:** The Columbus West and Central terminals have a total of two outfalls which are approximately 30 feet away from each other. Marathon has requested that these two outfalls be placed under one permit. Ohio EPA finds this acceptable. One option is to modify the Columbus West permit to include the outfall that is in the Columbus Central permit. After the modification is complete, the Columbus Central permit can be terminated. If you have questions on the process, John Owen is in the permitting section and can be contacted at (614) 728-3849 or [john.owen@epa.ohio.gov](mailto:john.owen@epa.ohio.gov). You can also find the permit application forms at the following site:

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

Central District Office  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

614 | 728 3778  
614 | 728 3898 (fax)  
[www.epa.ohio.gov](http://www.epa.ohio.gov)

3. **Sampling frequencies:** It was requested that the sampling frequencies for the permits be the same. Sampling frequency is based on the sampling results collected. During the next permit renewal, Ohio EPA will attempt to have the sampling frequencies be the same if the sampling results allow it. **Please make special mention of this during the permit renewal.**
4. **Missing Sampling Data:** There are two missing sample reports for the Marathon Columbus Central terminal. **Please review your records and resubmit through eDMR if possible.** The following data is missing:

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
November 2006	Biochemical Oxygen Dem	1/Month	1	0	11/01/2006
May 2008	Carbon, Total Organic	1/Month	1	0	05/01/2008

Attached is the Reconnaissance Inspection Report. There are no additional items which require a response.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,



Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

Enclosure

c: Amber Moser, Marathon HES Professional

Marathon Petroleum – Columbus West Terminal  
NPDES Compliance Inspection Report

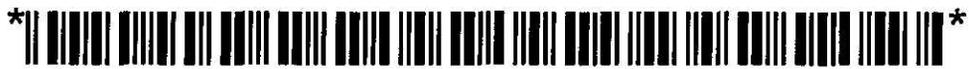
SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4IN00065	OH0070661	4/12/11	R	S	2

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected  Marathon Petroleum 4125 Fisher Road Columbus, Ohio	Entry Time	Permit Effective Date
	10:00 AM	March 1, 2008
	Exit Time	Permit Expiration Date
10:20 AM	February 28, 2013	
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Garrison, Terminal Manager Amber Moser, HES Professional	(614) 279-8591 (419) 421-2935	
Name and Title of Responsible Official	Phone Number	
Greg Garrison, Terminal Manager	(614) 279-8591	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
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S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
N	Laboratory	
S	Effluent/Receiving Waters	
N	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Signatures			
	4-21-11		4-20-11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4IN0002020110421\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



Environmental  
Protection Agency

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

April 21, 2011

Gregory L. Garrison  
Marathon Petroleum Company  
4125 Fisher Road  
Columbus, OH 43228

Re: **Marathon Petroleum Company  
NPDES Permits  
Marathon Columbus East Terminal 4IN00020 / OH0029041  
Marathon Columbus Central Terminal 4IN00062 / OH0070629  
Marathon Columbus West Terminal 4IN00065 / OH0070661  
Reconnaissance Inspections**

Dear Mr. Garrison:

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**Findings:**

1. **Best Management Practices (BMPs):** The Columbus East terminal's permit includes a condition which requires Marathon to follow the BMPs submitted in 1997. Marathon personnel requested to follow standardized BMPs. Ohio EPA finds this acceptable as long as a copy is submitted. **Please submit the standardized BMPs to Ohio EPA.**
2. **Columbus Central and West Outfalls:** The Columbus West and Central terminals have a total of two outfalls which are approximately 30 feet away from each other. Marathon has requested that these two outfalls be placed under one permit. Ohio EPA finds this acceptable. One option is to modify the Columbus West permit to include the outfall that is in the Columbus Central permit. After the modification is complete, the Columbus Central permit can be terminated. If you have questions on the process, John Owen is in the permitting section and can be contacted at (614) 728-3849 or [john.owen@epa.ohio.gov](mailto:john.owen@epa.ohio.gov). You can also find the permit application forms at the following site:

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[www.epa.ohio.gov](http://www.epa.ohio.gov)

3. **Sampling frequencies:** It was requested that the sampling frequencies for the permits be the same. Sampling frequency is based on the sampling results collected. During the next permit renewal, Ohio EPA will attempt to have the sampling frequencies be the same if the sampling results allow it. **Please make special mention of this during the permit renewal.**
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Attached is the Reconnaissance Inspection Report. There are no additional items which require a response.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,



Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

Enclosure

c: Amber Moser, Marathon HES Professional

Marathon Petroleum – Columbus East Terminal  
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4IN00020	OH0029041	4/12/11	R	S	2

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Marathon Petroleum 3855 Fisher Road Columbus, Ohio	10:30 AM	January 1, 2011
	Exit Time	Permit Expiration Date
	10:50 AM	December 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Garrison, Terminal Manager Amber Moser, HES Professional	(614) 279-8591 (419) 421-2935	
Name and Title of Responsible Official	Phone Number	
Greg Garrison, Terminal Manager	(614) 279-8591	

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N	Collection System	
S	Flow Measurement	
N	Laboratory	
S	Effluent/Receiving Waters	
N	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Signatures			
<i>Cole Miller</i>	4-21-11	<i>Erin Sherer</i>	4-20-11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4IN0001720110317\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



Environmental  
Protection Agency

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

239 4460  
\* 458 2517 \*

FILE COPY

March 17, 2011

Mr. Jay A. Steinberg, President  
ASARCO Multi-State Custodial Trust Trustee  
35 East Wacker Drive – Suite 1550  
Chicago, Illinois 60601

RE: **Notice of Violation – ASARCO Incorporated Columbus Facility National Pollutant Discharge Elimination System (NPDES) Ohio EPA Permit 4IN00017**

Dear Mr. Steinberg:

This correspondence serves as a **Notice of Violation** for the diversion of wastewater from the ASARCO Columbus Facility NPDES-permitted treatment works into the City of Columbus separate storm sewer system. The diversions bypass the approved treatment system, are illicit discharges to a publicly owned storm sewer, and result in violations of the water quality criteria for cadmium and zinc in American Ditch, a water of the State of Ohio. In addition, high levels of zinc and hardness in all sampled storm sewers and conveyances bordering the ASARCO Columbus property during dry weather indicate there is a high likelihood that contaminated groundwater from ASARCO is migrating off site and resulting in additional violations of the water quality criteria for zinc in American Ditch.

Listed below are the findings based upon Ohio EPA data and information collected by the City of Columbus and shared with Ohio EPA concerning the above referenced concerns.

1. **Finding:** Dry weather water quality samples of American Ditch and the Windsor Avenue Storm Sewer show zinc and cadmium concentrations are acutely toxic to aquatic life and greatly exceed water quality criteria.

The City of Columbus (the City) storm water facilities are permitted under NPDES Ohio EPA Permit 4PI00000 which requires, in part, the City to perform dry weather monitoring to detect illicit discharges to its storm sewer system. The City performed dry weather sampling of the storm sewers and American Ditch in the vicinity of ASARCO in 2010. The high zinc results of these samples prompted the Ohio EPA to sample the area on December 14, 2010. Table 1 summarizes the zinc and cadmium levels detected in American Ditch downstream of the Windsor Ave Storm Sewer discharge and upstream of the ASARCO NPDES permitted outfall, the levels detected in the Windsor Ave Storm Sewer, and compares these values to the Aquatic Life Outside Mixing Zone Maximum criteria as established in Ohio Administrative Code Chapter 3745-1-07.

Table 1. Water Quality Summary of Windsor Ave Storm Sewer and Vicinity			
Site	Date	Zinc (g/l)	Cadmium (g/l)
Outside Mixing Zone Maximum	--	390	22
American Ditch at Joyce Ave downstream Windsor	6/18/10	<b>3500</b>	20.8
	10/1/10	<b>4160</b>	<b>26</b>
	12/14/10	<b>4940</b>	<b>237</b>
Windsor Ave Storm Sewer upstream American Ditch	12/14/10	<b>11200</b>	<b>189</b>
	2/18/11	<b>15000</b>	<b>136</b>
Windsor Ave Storm Sewer further west	2/18/11	<b>23000</b>	<b>189</b>

Note: **Bolded** values exceed water quality criteria.

Due to the extreme concentrations of zinc and cadmium detected in the Windsor Storm Sewer in December, Ohio EPA requested the City televise and sample the sewer which they did in February 2011.

2. **Finding:** Illicit connections exist from the wastewater collection system for the ASARCO Columbus facility to the City of Columbus Windsor Avenue storm sewer.

On March 3, 2011, the City of Columbus informed Ohio EPA of illicit connections documented during an inspection of the Windsor Avenue storm sewer. In February, City personnel televised the storm sewer and the initial findings show at least two active (discharging at the time of the video) taps, two inactive taps, and four buried inlets from the ASARCO property into the storm sewer.

**Requested Action:** Ohio EPA requests that ASARCO cease the illicit discharges as expeditiously as possible. All wastewater from the ASARCO Columbus facility must be routed to an appropriately sized treatment facility with a NPDES permitted discharge. The current treatment system must be evaluated to determine if it can effectively treat the additional flows from the illicit discharge points before additional wastewater is routed to it.

3. **Finding:** Dry weather sampling of the Joyce Ave Storm Sewer potentially indicate ground water contaminated with zinc is contributing to exceedences of the zinc water quality criteria in American Ditch. In addition, dry weather surface water samples on the ASARCO Columbus facility property show elevated levels of zinc may also indicate shallow groundwater contamination is occurring.

Observations and water quality data collected by City staff indicate that the Joyce Ave Storm Sewer may have contaminated groundwater intruding into it at a point just upstream of Windsor Ave. The storm sewer, which is dry at the upstream access point, has standing water at the next downstream access point, and flowing water at the downstream access point. This water is very hard and is present during dry periods indicating it is potentially groundwater. Zinc concentrations from samples of this water range between 415 – 1010 :g/l. Zinc is the only metal that is elevated in these samples.

A sample taken on 12/14/10, from American Ditch where it daylights on the ASARCO Columbus property had an elevated zinc concentration of 1760 :g/l. An off-site source of zinc is possible; however, storm sewer maps of this area indicate that a storm sewer may still exist from the ASARCO property and discharge to American Ditch upstream of this sampled point.

**Requested Action:** Ohio EPA requests that ASARCO determine if there is migration of contaminated groundwater from the ASARCO Columbus site. If it is determined that contaminated groundwater is migrating offsite, ASARCO will need to prevent continued offsite migration of contaminated groundwater.

4. **Finding:** ASARCO, or a subsequent property owner, must maintain NPDES permit 4IN00017 for as long as there is a discharge from the wastewater treatment system currently on site. The draft 2011 ASARCO Multi-State Custodial Trust 3-yr Budget as submitted recently to Ohio EPA-DERR does not allocate funds to maintain the NPDES permit after 2012.

**Requested Action:** Ohio EPA requests that ASARCO escrow sufficient funds to provide reasonable long-term coverage of the operation and maintenance of the current treatment system and its NPDES permit requirements. These escrowed funds need to be stipulated for operation and maintenance of the NPDES permit and the wastewater treatment system associated with it. Alternatively, ASARCO could re-engineer its remedy so that there is no discharge requiring an NPDES permit associated with the site.

A written response to the requested actions is needed by **May 1, 2011**. An interim conference call involving the Ohio EPA Central District Office Divisions of Surface Water, Drinking and Groundwater, and Emergency and Remedial Response, the City of Columbus, and the appropriate persons involved with the ASARCO Columbus Custodial Trust, its budget, and its environmental site is recommended.

Please note that the Ohio EPA has the authority to seek civil penalties as provided in section 6111.09 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does

*PARMOR*

Mr. Jay A. Steinberg  
ASARCO Multi-State Custodial Trust Trustee  
Page | 4

not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If you have any questions, or wish to arrange a conference call, please contact me at [erin.sherer@epa.ohio.gov](mailto:erin.sherer@epa.ohio.gov) or at (614) 728-3839.

Sincerely,

*Erin Sherer*

Erin Sherer  
Supervisor, Compliance and Enforcement  
Division of Surface Water  
Central District Office

Enclosures

- ec: Doug Crandall, DERR/CDO
- Audrey Rush, DERR/CO
- Jason Reed, DDAGW/CDO
- Harry Kallipolitis, DSW/CDO
- Cole Miller, DSW/CDO
- Bill Fischbein, Legal
- Mark Navarre, Legal
- Jeff Cox, City of Columbus

JAY

DAVID DANE  
US DOJ

Not covered } problems  
known }

ES:slw 032011 NOV ASARCO

*Trust*  
358K request for more to USEPA  
Very tight budget

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4GS0001120110311\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



Environmental  
Protection Agency

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

March 11, 2011

Mr. Stephen Renner, Director  
Franklin County Sanitary Engineer's Office  
280 East Broad Street, Suite 201  
Columbus, OH 43215

Re: 4PA00011 / OH0054950  
Taylor Estates  
4GS00011 / OHS000003  
Century Acres  
~~4GS00014 / OHS000003~~  
~~Holton Park~~  
Reconnaissance Inspections

Dear Mr. Renner:

On February 15, 2011, Reconnaissance Inspections were conducted at the Taylor Estates, Century Acres, and Holton Park Wastewater Treatment Plants (WWTP). Present for the inspections were Ted Abbott and Charlie McFarland representing the Franklin County Sanitary Engineers and myself of the Ohio EPA, Central District Office Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permits.

On February 14, 2011, I met with Dale Kocarek of Stantec and John Owen of Ohio EPA to discuss the replacement of Taylor Estates and Holton Park WWTPs. It was indicated that construction is likely to begin in August 2011. The current plants need to be maintained and possibly repaired depending on when the replacement plants are built.

Attached are the Reconnaissance Inspection Reports. There are a few items which require a written response. **Please respond in writing within 30 days of the receipt of this letter.**

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846.

Sincerely,

Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

CM/nsm Taylor Estates Inspection 2-15-11

Central District Office  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

614 | 728 3778  
614 | 728 3998 (fax)  
www.epa.ohio.gov

## NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4GS00011	OHS000003	2/15/2011	R	M	1

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Century Acres Greengate Dr. Groveport, Ohio 43125	11:10 AM	4/1/2010
	Exit Time	Permit Expiration Date
	11:40 AM	12/31/2014
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Charles McFarland, Operator of Record Ted Abbott, Operator		(614) 525-3747
Name and Title of Responsible Official		Phone Number
Stephen Renner, Director, Franklin County Sanitary Engineers 280 East Broad St. Room 201 Columbus, Ohio 43215		(614) 525-3940

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
S	Records/Reports	
M	Operations & Maintenance	Algae growth on sand beds was incorrectly placed on the ground around the sand beds.
M	Facility Site Review	The wall dividing the sand beds was crumbling and water flowed from one bed to the other.
N	Collection System	
S	Flow Measurement	
N	Laboratory	
S	Effluent/Receiving Waters	
S	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Signatures			
	3-11-11		3-11-11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

## Summary of Findings and Comments Century Acres WWTP

### General

The sewage treatment plant serving the Century Acres subdivision consists of an influent lift station, rack screen and grit channel, twin aeration tanks and clarifiers, dosing tank with time lapse meters, surface sand filters, ultra-violet disinfection, and post aeration. The sewage plant serves is designed for 25,000 gallons per day. Sludge is stored in an aerated holding tank and hauled. The facility currently operates under a general NPDES permit but previously they operated under 4PA00010.

1. At the time of the inspection, the following general observations were made with the operation and maintenance of the plant:
  - a. There was no permanent marker at the outfall. The permit required the marker to be posted by August 1, 2010. **Please respond with a schedule of posting the sign.**
  - b. The alarm is an auto-dialer. The sewage tributary area is on well water and is serviced by two different electric companies so there is a possibility where electricity to the plant is off but still have incoming flows. **Can your alarm system still dial when the electricity is shut off? Please respond.**
  - c. The sand bed walls were weathered and in need of repair. The wall dividing the two walls has a gap where flow from one bed can enter the other wall (see attached picture). This problem affects the operations of the plant. **Please respond with a schedule of repairing the concrete walls of the sand filters.**
  - d. There were small piles of algae along the filter walls which had been scraped off the sand filters. If the algae are contaminated with biosolids, the piles need to be disposed to a landfill. Using a waste container is recommended. **Please comment on this suggestion.**
  - e. The blowers are constantly on.
  - f. The operator maintains a log book which includes observations.
2. There have been no effluent violations since February 2005. The attached table summarizes flow between January 1, 2009, and February 1, 2011.
3. The effluent from the ultra violet tank looked clear. The outfall was not investigated.

Century Acres Flows Jan 1 2009 - Feb 1 2011		
	Flow (gpd)	Date
Highest Flow Rate	29400	7/10/2010
Second Highest Flow Rate	29000	1/25/2010
Average since Jan. 2009	13980	



NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PA0001120110311\*

- Type the correct permit number and date in both lines
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- Change the font to Code3of9High



Environmental  
Protection Agency

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

March 11, 2011

Mr. Stephen Renner, Director  
Franklin County Sanitary Engineer's Office  
280 East Broad Street, Suite 201  
Columbus, OH 43215

Re: 4PA00011 / OH0054950  
Taylor Estates  
4GS00011 / OHS000003  
Century Acres  
~~4GS00014 / OHS000003~~  
~~Holton Park~~  
Reconnaissance Inspections

Dear Mr. Renner:

On February 15, 2011, Reconnaissance Inspections were conducted at the Taylor Estates, Century Acres, and Holton Park Wastewater Treatment Plants (WWTP). Present for the inspections were Ted Abbott and Charlie McFarland representing the Franklin County Sanitary Engineers and myself of the Ohio EPA, Central District Office Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permits.

On February 14, 2011, I met with Dale Kocarek of Stantec and John Owen of Ohio EPA to discuss the replacement of Taylor Estates and Holton Park WWTPs. It was indicated that construction is likely to begin in August 2011. The current plants need to be maintained and possibly repaired depending on when the replacement plants are built.

Attached are the Reconnaissance Inspection Reports. There are a few items which require a written response. **Please respond in writing within 30 days of the receipt of this letter.**

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846.

Sincerely,

Cole Miller  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

CM/nsm Taylor Estates Inspection 2-15-11

Central District Office  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

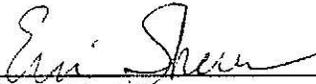
614 | 728 3778  
614 | 728 3898 (fax)  
www.epa.ohio.gov

## NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4PA00011	OH0054950	2/15/11	R	M	1

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Taylor Estates WWTP 5920 Alice Dr. Plain Township, Franklin County	10:00	August 1, 2010
	Exit Time	Permit Expiration Date
	10:30	July 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Charles McFarland, Operator of Record Ted Abbott, Operator	(614) 525-3747	
Name and Title of Responsible Official	Phone Number	
Stephen Renner, Director, Franklin County Sanitary Engineers 280 East Broad St. Room 201 Columbus, Ohio 43215	(614) 525-3940	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
S	Records/Reports	
S	Operations & Maintenance	
U	Facility Site Review	The state of the equipment and tanks are extremely deteriorated.
N	Collection System	
S	Flow Measurement	
N	Laboratory	
S	Effluent/Receiving Waters	
S	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Signatures			
	3-11-11		3-7-11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

## Summary of Findings and Comments Taylor Estates WWTP

### General

The sewage treatment plant serving the Taylor Estates subdivision consists of an influent lift station, twin aeration tanks and clarifiers, dosing tank with time lapse meters, surface sand filters, ultra-violet disinfection, and post aeration. The sewage plant serves approximately 47 homes and is designed for 25,000 gallons per day. Sludge is stored in an aerated holding tank and hauled.

1. At the time of the inspection, the following general observations were made with the operation and maintenance of the plant:
  - a. There was no permanent marker at the outfall. The permit required the marker to be posted by December 1, 2010. **Please respond with a schedule of posting the marker.**
  - b. The sand beds appeared to need additional sand. **Please provide a schedule for applying the sand.**
  - c. There is a visual alarm for the lift station. Although the community served by the WWTP is on well water, it might be beneficial to have a dialer or a type of wireless alarm on the plant. **Please comment on the feasibility of obtaining a dialer alarm.**
  - d. The blowers are constantly on.
  - e. The operator maintains a log book which includes observations.
2. There have been no permit effluent violations since January 2010. The attached table summarizes flow between January 1, 2010, and January 1, 2011. The facility will likely benefit from I&I work.
3. The effluent from the outfall looked clear and there were no noticeable solids deposited.
4. The plant would likely need repairs to stay online indefinitely. However, because the WWTP will soon be replaced, professional judgment should be used to maintain the plant. Here are some of the noted maintenance issues:
  - a. The concrete walls around the sand bed are spalling.
  - b. The grates are rusted and need replaced.
  - c. It was indicated by the operator that the baffle wall between the clarifiers is no longer functioning properly and sometimes leads to septicity problems.
  - d. The Taylor Estates Wastewater Treatment Plant Evaluation of Replacement Alternatives submitted by Michael Pilutti of Franklin County

Department of Sanitary Engineering identifies other structural deficiencies that a new plant would correct.

5. The permit currently requires residual chlorine to be tested in the summer but the facility utilizes ultra violet disinfection. Ohio EPA will modify the permit by May to no longer include the chlorine effluent limit.

Flow Information for Taylor Estates 1/1/10 - 1/1/11		
	Flow (mgd)	Date
Highest Flow Rate	0.096	1/24/2010
Second Flow Rate	0.072	1/18/2010
Average Since Last Inspection	0.024	