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March 10, 2011

Mark Kelsey, Director
Department of Public Service
City of Columbus
Department of Public Service
109 North Front Street
Columbus, OH 43215-9005

**Re: Alum Creek Transfer Station / Franklin County
Industrial Storm Water Permit 4GR00390*DG**

**Morse Road Transfer Station / Franklin County
Industrial Storm Water Permit 4GR00549*DG**

**Georgesville Road Transfer Station / Franklin County
Industrial Storm Water Permit 4GR00550*DG**

Dear Mr. Kelsey:

This letter is written in follow up to a meeting held at our office on February 22, 2011, to discuss storm water management controls at the Alum Creek and Morse Road Transfer Stations. Thomas J. Black and Diego DeBonis with the city of Columbus and Greg Sanders with Ohio EPA were present during the meeting. The Georgesville Road Transfer Station was not discussed during the meeting, but was recently inspected and had similar issues. These facilities are currently covered under our General Storm Water Permit Associated with Industrial Activities. Based on our discussion and the conditions of the General Storm Water Permit, the following items were addressed:

Alum Creek Transfer Station:

Inspections conducted at this facility during 2007 clearly documented oil-laden storm water discharging from this facility into the separate storm sewer system and eventually into Alum Creek. I understand a portion of the oil-laden discharge originated from the leaking underground diesel tank which is currently subject to remediation. However, it was apparent that oil sheens on the parking lot were originating from poor housekeeping practices at the facility, namely in association with the vehicle parking outside. This issue was brought to the attention of onsite personnel at the

time of the inspection. Subsequent to the inspection, a Storm Water Pollution Prevention Plan (SWPPP) was developed which indicated the implementation of an oil water separator to treat the contaminated storm water run-off. I reviewed the SWPPP at the time and agreed to the implementation of the plan.

During our meeting on February 22, 2011 we were informed by Mr. Black, subsequent studies were conducted at the site which suggested the oil/water separator was not sufficient to treat the contaminated run-off. It was further suggested the source of contamination would be eliminated by storing the vehicles under roof, eliminating the exposure to storm water. However, Mr. Black indicated current funding was not available to implement this Best Management Practice (BMP).

Please understand the option to do nothing in the immediate future to address this contamination threat is not acceptable, given the contamination to storm water continues as documented in a recent inspection by Greg Sanders on February 8, 2011. At this time, I am formally requesting both short and long term control measures to address this storm water contamination threat. ***Failure to implement a short term control plan within thirty days followed by a long term control plan within six months will result in a formal enforcement recommendation.***

Morse Road Transfer Station:

Approximately two years ago, I reviewed and accepted a Storm Water Pollution Prevention Plan for implementation at the Morse Road Transfer Station. The SWPPP incorporated several BMP's to minimize the threat of storm water contamination to Big Walnut Creek. Based on my recent inspection of the facility on February 23, 2011, I noted the SWPPP has not been implemented. At this time I am formally requesting the status regarding implementation of the SWPPP for this site.

Georgesville Road Transfer Station:

Based on a recent inspection of the facility on March 4, 2011, it was noted that the SWPPP has not been implemented. At this time I am formally requesting the status regarding implementation of the SWPPP for this site. Dumpsters did not have lids or were not covered. There was excessive trash and sediment at the site getting into storm water drains. The covered fueling station was allowing storm water to flow across the fueling area and discharge contaminated storm water to a storm water drain.

Mark Kelsey, Director
Department of Public Service
City of Columbus
Department of Public Service
Page 3 of 3

If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3851.

Sincerely,



Harry Kallipolitis
Environmental Specialist
Division of Surface Water
Central District Office

c: Jeff Bohne, DSW/CDO
Greg Sanders DSW/CDO
Erin Sherer, Enforcement Supervisor, DSW-CDO
Scott Shields, City of Columbus, DOSD
Mr. Steve Brown, Administrator and TJ Black, City of Columbus,
Refuse Collection Div.
Diego Debonis, City of Columbus, Refuse Collection Division

HK/nsm Alum Creek Transfer Station Mtg. Feb. 22, 2011

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