



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Allen County
Lima Refining Company
NPDES Permit

May 21, 2010

Mr. Roy C. Warnock
Vice President and General Manager
Lima Refining Company
1150 South Metcalf Street
Lima, Ohio 45804

Dear Mr. Warnock:

On May 6, 2010, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Lima Refining Company and the Buckeye Road Tank Facility. Mr. Dwain Schroeder and Mr. Gary Vonderembse, Ms. Katelyn Lamoreau and Mr. Joe Bischoff were present and provided information on operations and maintenance at each facility. The inspections included an interview with completion of the enclosed inspection report, assessment of the refinery wastewater treatment system, observation of the final effluent discharge into the Ottawa River and a brief overview of the wastewater system at the Buckeye Road Tank Facility. An examination of Zurmehly Creek was also conducted in conjunction with the Refinery inspection. Our inspection findings are as follows:

Lima Refinery

During our visit, all major wastewater treatment units were in operation. The final effluent discharging to the Ottawa River was clear.

A review of your discharge monitoring reports indicates that concentration and loading violations for selenium were reported in March and April 2010. Your staff indicated that increased monitoring of influent waste streams and selenium treatment system process adjustments are being made in an effort to return to compliance. We suggested that the return waste stream from the Siemens (Actiflo), which discharges into the sludge thickener, be tested to determine the amount of selenium that is being returned to the wastewater treatment plant.

Mr. Roy C. Warnock
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Our observation of the water flowing through Zurmehly Creek revealed no presence of any sheen. Mr. Bischoff stated that the oil sheen that was reported in November 2009, was very brief and was vacuumed off the water surface immediately upon discovery. Monitoring of creek conditions is conducted daily.

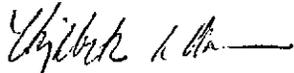
We received your NPDES permit renewal application for the Lima Refinery on May 4, 2010. We are currently in the process of issuing the initial Antidegradation Rule Public Notice for the application. Please continue to follow your current permit until your renewal permit becomes effective.

Buckeye Road Tank Facility

A brief tour and observation of the storm water retention system serving the Buckeye Road Tank Facility was conducted. During our visit there was no discharge from the storm water retention pond. No NPDES permit violations have been reported in the past year.

Our completed inspection reports are enclosed for your records. If you have any questions, please contact Mr. Tom Poffenbarger at (419) 373-3008.

Sincerely,



Elizabeth A. Wick, P.E.
District Engineer/Unit Supervisor
Division of Surface Water

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Enclosure

pc: DSW-NWDO.File..

Permit #: 2IG00001
 NPDES #: OH0002623



State of Ohio Environmental Protection Agency
 Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2IG00001	OH0002623	5/6/2010	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Lima Refining Company 1150 South Metcalf Street Lima, Ohio 45804	9:35 AM	12/1/2005
	Exit Time	Permit Expiration Date
	12:30 PM	10/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Dwain Schroeder, Sr. Environmental Engineer	419-226-2676	
Mr. Gary Vonderembse, Environmental Manager	419-226-2562	
Ms. Katelyn Lamoreau, Co-Op Student		
Name, Address and Title of Responsible Official	Phone Number	
Mr. Roy C. Warnock, Vice President & General Manager Lima Refining Company 1150 South Metcalf Street Lima, Ohio 45804	419-226-2300	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment			
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Compliance Schedule			
<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program			
<input type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input type="checkbox"/> Other			
<input type="checkbox"/> Collection System					

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

Final effluent discharge to the Ottawa River was clear.

Selenium violations were reported in March and April 2010.

NPDES permit renewal is being processed; Antidegradation Public Notice will be issued soon.

Inspector	Reviewer
<i>Thomas Poffenbarger</i> 5/14/10	<i>Elizabeth A. Wick</i> 5/19/10
Thomas Poffenbarger, P.E. District Engineer Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Water Quality Engineer Division of Surface Water Northwest District Office

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 Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance Schedules/Violations

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in NPDES Permit
- (e) Permittee is meeting compliance schedule..... Y

Comments/Status:

- (a) Selenium - March and April 2010, Sheen in Zurmehly Creek - Nov. 2009, Oil mist - Nov. 2009
- (b) Increased monitoring and treatment system adjustments are being taken to control selenium.
- (c) Compliance Schedule for BEHP
- (e) Letter indicating full compliance received in December 2008.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
 Class: I
- (f) Copy of certificate of Operator of Record displayed on-site..... N/A
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... Y
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On DMRs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

(a) Dual Feed is main standby power, a portable generator is available.
 (i) Flight skimmers in API separator

Record Keeping:

- (a) Log book provided..... N/A
- (b) Format of log book (i.e. computer log, hard bound book)
- (c) Log book(s) kept onsite (in an area protected from weather)..... N/A
- (d) Log book contains the following:
 - I. Identification of treatment works..... N/A
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N/A
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N/A
 - IV. Laboratory results (unless documented on bench sheets)... N/A
 - V. Identification of person making log entries..... N/A
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: August 18, 2009 Approval #: 2MP00015 Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method: Land Applied)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name: Soil Tech at Land farm; Waste Mgmt is hauler)
- (f) Has amount of sludge generated changed significantly since last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... Y
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
(Date of last calibration: 8/18/2009)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

(f) Flow measuring equipment is inspected several times per shift.

Section I: Self-Monitoring Program (cont)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) 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)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Bioassay, mercury, BEHP, bromomethane, BOD (split samples).

Lab name: Alloway Environmental Testing

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: DMRQA #29 - 2008

Comments/Status:

(i) pH result was unacceptable.

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	none	none	None	None	None	Clear	

Comments/Status:

002 – No Discharge

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: