



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

August 28 2008

RE: AIR BP – CLEVELAND HOPKINS AIRPORT  
PERMIT NO. 3IN00060  
CUYAHOGA COUNTY

Mr. Jack Kemper  
Facility Manager  
Air BP – Cleveland Hopkins Airport  
5241 Secondary Road  
Cleveland, Ohio 44135

Dear Mr. Kemper:

On August 7, 2008, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Steve Price, Operation Supervisor and Mr. Rob Milla, Fuel Safety Coordinator. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The treatment system consists of an 8,000-gallon oil/water separator which discharges by gravity to a 26-foot deep, six-foot diameter well. Wastewater is then pumped to pond #1 which discharges from the bottom of the pond to pond #2 which also discharges from the bottom to a nearby storm sewer.
2. The oil/water separator is stick-tested daily to assure no unreported spills have occurred.
3. The separator was last cleaned on October 13, 2005.
4. Air BP continues to operate at the facility with no lease from the City of Cleveland.
5. The facility's Spill Prevention Control & Countermeasure plan is currently being updated.
6. Parsons Engineering is contracted to perform groundwater sampling once per year.
7. Sanitary waste is directed to a holding tank. The tie-in location has previously been determined, however the project continues to be delayed since Air BP is operating without a lease.
8. Waid Corporation is contracted to pump out the holding tank on an as needed basis.
9. The settling ponds were both visually clear and free of oil sheens. No discharge was occurring from the second pond.
10. Mr. Robert Milla and Mr. Steve Price both from Air BP perform the NPDES permit sampling for the facility. It has previously been noted that Mr. Robert Milla and Mr. Steve Price were both trained on proper sampling procedures from Mr. Bill Borchardt from your Chicago office.
11. All samples which are collected are iced down and shipped overnight by FedEx to Test America.
12. Mr. Price was informed that a Web-based application for submitting the monthly operating report is currently available. Web addresses are available below which provide information on this topic along with training dates.

This office has recently reviewed your self-monitoring reports covering the period April 1, 2007 through July 31, 2008 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of non-compliance are as follows:

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### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	9.0	9.2	9/12/2007
001	00400	pH	1D Conc	9.0	10.3	7/19/2007

### Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
5/1/2007	001	00530	Total Suspended Solids	1/Month	1	0
5/1/2007	001	00400	pH	1/Month	1	0
5/1/2007	001	01094	Zinc, Total Recoverabl	1/Month	1	0
5/1/2007	001	34010	Toluene	1/Month	1	0
5/1/2007	001	34030	Benzene	1/Month	1	0
5/1/2007	001	34371	Ethylbenzene	1/Month	1	0
5/1/2007	001	81551	Xylene, Total	1/Month	1	0
5/1/2007	001	00310	Biochemical Oxygen Dem	1/Month	1	0
5/1/2007	001	00550	Oil and Grease, Total	1/Month	1	0
5/1/2007	001	00335	Chemical Oxygen Demand	1/Month	1	0
8/1/2007	001	00045	Total Precipitation	1/Day	1	0
8/2/2007	001	00045	Total Precipitation	1/Day	1	0
8/3/2007	001	00045	Total Precipitation	1/Day	1	0
8/4/2007	001	00045	Total Precipitation	1/Day	1	0
8/5/2007	001	00045	Total Precipitation	1/Day	1	0
8/6/2007	001	00045	Total Precipitation	1/Day	1	0
8/7/2007	001	00045	Total Precipitation	1/Day	1	0
8/8/2007	001	00045	Total Precipitation	1/Day	1	0
8/9/2007	001	00045	Total Precipitation	1/Day	1	0
8/10/2007	001	00045	Total Precipitation	1/Day	1	0
8/11/2007	001	00045	Total Precipitation	1/Day	1	0
8/12/2007	001	00045	Total Precipitation	1/Day	1	0
8/13/2007	001	00045	Total Precipitation	1/Day	1	0
8/14/2007	001	00045	Total Precipitation	1/Day	1	0
8/15/2007	001	00045	Total Precipitation	1/Day	1	0
8/16/2007	001	00045	Total Precipitation	1/Day	1	0
8/17/2007	001	00045	Total Precipitation	1/Day	1	0
8/18/2007	001	00045	Total Precipitation	1/Day	1	0
8/19/2007	001	00045	Total Precipitation	1/Day	1	0
8/20/2007	001	00045	Total Precipitation	1/Day	1	0
8/21/2007	001	00045	Total Precipitation	1/Day	1	0
8/22/2007	001	00045	Total Precipitation	1/Day	1	0
8/23/2007	001	00045	Total Precipitation	1/Day	1	0
8/24/2007	001	00045	Total Precipitation	1/Day	1	0

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Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
8/25/2007	001	00045	Total Precipitation	1/Day	1	0
8/26/2007	001	00045	Total Precipitation	1/Day	1	0
8/27/2007	001	00045	Total Precipitation	1/Day	1	0
8/28/2007	001	00045	Total Precipitation	1/Day	1	0
8/29/2007	001	00045	Total Precipitation	1/Day	1	0
8/30/2007	001	00045	Total Precipitation	1/Day	1	0
8/31/2007	001	00045	Total Precipitation	1/Day	1	0
12/1/2007	001	34694	Phenol	1/Quarter	1	0
12/1/2007	001	34696	Naphthalene	1/Quarter	1	0

Please note that Ohio EPA has converted from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**. The new reporting system is entirely Web-based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs). User training is going to be available in October of this year. Please consult the following Web site for updates regarding the specific date:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMRtraining.html>

If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

Please be advised that such instances of non-compliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mlh