



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

November 20, 2009

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 November 10, 2009, 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. Todd Reitz, Fuel Safety Coordinator. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with 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 6 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 is currently in negotiations with the City of Cleveland for a 20 year lease.
5. Air Services is no longer renting a bay in the maintenance shop.
6. The facility's Spill Prevention Control & Countermeasure plan was last amended on December 2008.
7. Parsons Engineering is still being contracted to perform groundwater sampling once per year.
8. Sanitary waste is directed to a holding tank. The tie-in location has previously been determined, however the project has continued to be delayed since Air BP has been operating without a lease.
9. Waid Corporation continues to be contracted to pump out the holding tank on an as needed basis
10. The settling ponds were both visually clear and free of oil sheens. No discharge was occurring from the second pond.

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11. Mr. Todd Reitz, Mr. Robert Milla and Mr. Steve Price all 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. Mr. Todd Reitz has been trained by Mr. Price.
12. All samples which are collected are iced down and shipped overnight by FedEx to STL Test America.
- 13. Testing for pH is required to be done on site. A sample cannot be shipped to a laboratory for analysis.**
14. It was discussed that phenol and Naphthalene were both cited for frequency violations for August 2009. On page 12 of the facility's NPDES permit, "quarterly (1/quarter) sampling frequency" is defined. Quarterly sampling frequency means that sampling shall be done in the months of March, June, August, and December unless specifically identified otherwise. Mr. Price informed me that these samples were taken. However, the samples were not taken in the correct month.
15. Flow rate and total precipitation frequency violations are occurring. Based on my discussion with Mr. Price, these violations appear to be the result of incorrectly filling out the electronic discharge monitor reporting (e-DMR) form. When the computer runs compliance, it is looking for a flow and total precipitation value each day since the measuring frequency is 1/day. On days when there is no flow or precipitation, the appropriate "A" code should be used. Additionally, a Preliminary Compliance Report should be automatically sent to the person who is electronically submitting the monthly data if frequency or limit violations are being reported. This provides the submitter an opportunity to verify the validity of the violations and resubmit the data if any data has been incorrectly reported.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2008 through October 31, 2009 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	9.0	9.2	4/6/2009
001	00400	pH	1D Conc	9.0	9.6	5/27/2009
001	00400	pH	1D Conc	9.0	9.1	6/17/2009
001	00400	pH	1D Conc	9.0	10.2	7/22/2009
001	00400	pH	1D Conc	9.0	9.5	8/11/2009
001	00400	pH	1D Conc	9.0	9.8	9/21/2009
001	00400	pH	1D Conc	9.0	9.3	10/12/2009

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Day	1	0	09/01/2008
001	00056	Flow Rate	1/Day	1	0	09/02/2008
001	00056	Flow Rate	1/Day	1	0	09/03/2008
001	00056	Flow Rate	1/Day	1	0	09/04/2008
001	00056	Flow Rate	1/Day	1	0	09/05/2008
001	00056	Flow Rate	1/Day	1	0	09/06/2008
001	00056	Flow Rate	1/Day	1	0	09/10/2008
001	00056	Flow Rate	1/Day	1	0	09/11/2008
001	00056	Flow Rate	1/Day	1	0	09/12/2008
001	00056	Flow Rate	1/Day	1	0	09/16/2008
001	00056	Flow Rate	1/Day	1	0	09/17/2008
001	00056	Flow Rate	1/Day	1	0	09/18/2008
001	00056	Flow Rate	1/Day	1	0	09/19/2008
001	00056	Flow Rate	1/Day	1	0	09/20/2008
001	00056	Flow Rate	1/Day	1	0	09/21/2008
001	00056	Flow Rate	1/Day	1	0	09/22/2008
001	00056	Flow Rate	1/Day	1	0	09/23/2008
001	00056	Flow Rate	1/Day	1	0	09/24/2008
001	00056	Flow Rate	1/Day	1	0	09/25/2008
001	00056	Flow Rate	1/Day	1	0	09/26/2008
001	00056	Flow Rate	1/Day	1	0	09/27/2008
001	00056	Flow Rate	1/Day	1	0	09/28/2008
001	00056	Flow Rate	1/Day	1	0	09/29/2008
001	00056	Flow Rate	1/Day	1	0	10/02/2008
001	00056	Flow Rate	1/Day	1	0	10/03/2008
001	00056	Flow Rate	1/Day	1	0	10/04/2008
001	00056	Flow Rate	1/Day	1	0	10/05/2008
001	00045	Total Precipitation	1/Day	1	0	10/06/2008
001	00056	Flow Rate	1/Day	1	0	10/06/2008
001	00056	Flow Rate	1/Day	1	0	10/07/2008
001	00056	Flow Rate	1/Day	1	0	10/09/2008
001	00056	Flow Rate	1/Day	1	0	10/10/2008
001	00056	Flow Rate	1/Day	1	0	10/11/2008
001	00056	Flow Rate	1/Day	1	0	10/12/2008
001	00056	Flow Rate	1/Day	1	0	10/13/2008
001	00056	Flow Rate	1/Day	1	0	10/14/2008
001	00056	Flow Rate	1/Day	1	0	10/15/2008
001	00056	Flow Rate	1/Day	1	0	10/16/2008
001	00056	Flow Rate	1/Day	1	0	10/17/2008
001	00056	Flow Rate	1/Day	1	0	10/18/2008
001	00056	Flow Rate	1/Day	1	0	10/19/2008
001	00056	Flow Rate	1/Day	1	0	10/20/2008
001	00056	Flow Rate	1/Day	1	0	10/21/2008

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Day	1	0	10/22/2008
001	00056	Flow Rate	1/Day	1	0	10/23/2008
001	00056	Flow Rate	1/Day	1	0	10/24/2008
001	00045	Total Precipitation	1/Day	1	0	10/26/2008
001	00056	Flow Rate	1/Day	1	0	10/26/2008
001	00056	Flow Rate	1/Day	1	0	10/27/2008
001	00056	Flow Rate	1/Day	1	0	10/30/2008
001	00056	Flow Rate	1/Day	1	0	10/31/2008
001	01094	Zinc, Total Recoverable	1/Month	1	0	12/01/2008
001	00045	Total Precipitation	1/Day	1	0	12/05/2008
001	00045	Total Precipitation	1/Day	1	0	12/07/2008
001	00045	Total Precipitation	1/Day	1	0	12/08/2008
001	00045	Total Precipitation	1/Day	1	0	12/13/2008
001	00045	Total Precipitation	1/Day	1	0	12/17/2008
001	00045	Total Precipitation	1/Day	1	0	12/20/2008
001	00045	Total Precipitation	1/Day	1	0	12/25/2008
001	00056	Flow Rate	1/Day	1	0	02/01/2009
001	00056	Flow Rate	1/Day	1	0	02/02/2009
001	00056	Flow Rate	1/Day	1	0	02/03/2009
001	00056	Flow Rate	1/Day	1	0	02/04/2009
001	00056	Flow Rate	1/Day	1	0	02/05/2009
001	00056	Flow Rate	1/Day	1	0	02/06/2009
001	00056	Flow Rate	1/Day	1	0	02/07/2009
001	00056	Flow Rate	1/Day	1	0	02/08/2009
001	00056	Flow Rate	1/Day	1	0	02/09/2009
001	00056	Flow Rate	1/Day	1	0	02/13/2009
001	00056	Flow Rate	1/Day	1	0	02/14/2009
001	00056	Flow Rate	1/Day	1	0	02/15/2009
001	00056	Flow Rate	1/Day	1	0	02/17/2009
001	00056	Flow Rate	1/Day	1	0	02/18/2009
001	00056	Flow Rate	1/Day	1	0	02/19/2009
001	00056	Flow Rate	1/Day	1	0	02/20/2009
001	00056	Flow Rate	1/Day	1	0	02/21/2009
001	00056	Flow Rate	1/Day	1	0	02/22/2009
001	00056	Flow Rate	1/Day	1	0	02/23/2009
001	00056	Flow Rate	1/Day	1	0	02/24/2009
001	00056	Flow Rate	1/Day	1	0	02/25/2009
001	00056	Flow Rate	1/Day	1	0	02/26/2009
001	00056	Flow Rate	1/Day	1	0	02/27/2009
001	00056	Flow Rate	1/Day	1	0	02/28/2009
001	00056	Flow Rate	1/Day	1	0	03/01/2009
001	00056	Flow Rate	1/Day	1	0	03/02/2009
001	00056	Flow Rate	1/Day	1	0	03/03/2009
001	00056	Flow Rate	1/Day	1	0	03/04/2009
001	00056	Flow Rate	1/Day	1	0	03/05/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Day	1	0	03/06/2009
001	00056	Flow Rate	1/Day	1	0	03/10/2009
001	00056	Flow Rate	1/Day	1	0	03/12/2009
001	00056	Flow Rate	1/Day	1	0	03/13/2009
001	00056	Flow Rate	1/Day	1	0	03/14/2009
001	00056	Flow Rate	1/Day	1	0	03/15/2009
001	00056	Flow Rate	1/Day	1	0	03/16/2009
001	00056	Flow Rate	1/Day	1	0	03/17/2009
001	00056	Flow Rate	1/Day	1	0	03/18/2009
001	00056	Flow Rate	1/Day	1	0	03/19/2009
001	00056	Flow Rate	1/Day	1	0	03/20/2009
001	00056	Flow Rate	1/Day	1	0	03/21/2009
001	00056	Flow Rate	1/Day	1	0	03/22/2009
001	00056	Flow Rate	1/Day	1	0	03/23/2009
001	00056	Flow Rate	1/Day	1	0	03/24/2009
001	00056	Flow Rate	1/Day	1	0	03/26/2009
001	00056	Flow Rate	1/Day	1	0	03/27/2009
001	00056	Flow Rate	1/Day	1	0	03/28/2009
001	00056	Flow Rate	1/Day	1	0	03/31/2009
001	00056	Flow Rate	1/Day	1	0	04/02/2009
001	00056	Flow Rate	1/Day	1	0	04/03/2009
001	00056	Flow Rate	1/Day	1	0	04/04/2009
001	00056	Flow Rate	1/Day	1	0	04/05/2009
001	00056	Flow Rate	1/Day	1	0	04/08/2009
001	00056	Flow Rate	1/Day	1	0	04/09/2009
001	00056	Flow Rate	1/Day	1	0	04/10/2009
001	00056	Flow Rate	1/Day	1	0	04/11/2009
001	00056	Flow Rate	1/Day	1	0	04/12/2009
001	00056	Flow Rate	1/Day	1	0	04/13/2009
001	00056	Flow Rate	1/Day	1	0	04/17/2009
001	00056	Flow Rate	1/Day	1	0	04/18/2009
001	00056	Flow Rate	1/Day	1	0	04/19/2009
001	00056	Flow Rate	1/Day	1	0	04/21/2009
001	00056	Flow Rate	1/Day	1	0	04/23/2009
001	00056	Flow Rate	1/Day	1	0	04/24/2009
001	00056	Flow Rate	1/Day	1	0	04/25/2009
001	00056	Flow Rate	1/Day	1	0	04/26/2009
001	00056	Flow Rate	1/Day	1	0	04/27/2009
001	00056	Flow Rate	1/Day	1	0	04/28/2009
001	00056	Flow Rate	1/Day	1	0	04/30/2009
001	00056	Flow Rate	1/Day	1	0	07/04/2009
001	00056	Flow Rate	1/Day	1	0	07/05/2009
001	00056	Flow Rate	1/Day	1	0	07/06/2009
001	00056	Flow Rate	1/Day	1	0	07/07/2009
001	00056	Flow Rate	1/Day	1	0	07/08/2009

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Day	1	0	07/09/2009
001	00056	Flow Rate	1/Day	1	0	07/10/2009
001	00056	Flow Rate	1/Day	1	0	07/11/2009
001	00056	Flow Rate	1/Day	1	0	07/13/2009
001	00056	Flow Rate	1/Day	1	0	07/14/2009
001	00056	Flow Rate	1/Day	1	0	07/15/2009
001	00056	Flow Rate	1/Day	1	0	07/16/2009
001	00056	Flow Rate	1/Day	1	0	07/17/2009
001	00056	Flow Rate	1/Day	1	0	07/20/2009
001	00056	Flow Rate	1/Day	1	0	07/21/2009
001	00056	Flow Rate	1/Day	1	0	07/25/2009
001	00056	Flow Rate	1/Day	1	0	07/27/2009
001	00056	Flow Rate	1/Day	1	0	07/28/2009
001	00056	Flow Rate	1/Day	1	0	07/30/2009
001	34694	Phenol	1/Quarter	1	0	08/01/2009
001	34696	Naphthalene	1/Quarter	1	0	08/01/2009
001	00056	Flow Rate	1/Day	1	0	09/01/2009
001	00056	Flow Rate	1/Day	1	0	09/02/2009
001	00056	Flow Rate	1/Day	1	0	09/03/2009
001	00056	Flow Rate	1/Day	1	0	09/04/2009
001	00056	Flow Rate	1/Day	1	0	09/05/2009
001	00056	Flow Rate	1/Day	1	0	09/06/2009
001	00056	Flow Rate	1/Day	1	0	09/07/2009
001	00056	Flow Rate	1/Day	1	0	09/09/2009
001	00056	Flow Rate	1/Day	1	0	09/10/2009
001	00056	Flow Rate	1/Day	1	0	09/11/2009
001	00056	Flow Rate	1/Day	1	0	09/12/2009
001	00056	Flow Rate	1/Day	1	0	09/13/2009
001	00056	Flow Rate	1/Day	1	0	09/14/2009
001	00056	Flow Rate	1/Day	1	0	09/15/2009
001	00056	Flow Rate	1/Day	1	0	09/16/2009
001	00056	Flow Rate	1/Day	1	0	09/17/2009
001	00056	Flow Rate	1/Day	1	0	09/18/2009
001	00056	Flow Rate	1/Day	1	0	09/19/2009
001	00056	Flow Rate	1/Day	1	0	09/20/2009
001	00056	Flow Rate	1/Day	1	0	09/23/2009
001	00056	Flow Rate	1/Day	1	0	09/24/2009
001	00056	Flow Rate	1/Day	1	0	09/25/2009
001	00056	Flow Rate	1/Day	1	0	09/26/2009
001	00056	Flow Rate	1/Day	1	0	10/04/2009
001	00056	Flow Rate	1/Day	1	0	10/05/2009
001	00056	Flow Rate	1/Day	1	0	10/06/2009
001	00056	Flow Rate	1/Day	1	0	10/07/2009
001	00056	Flow Rate	1/Day	1	0	10/08/2009
001	00056	Flow Rate	1/Day	1	0	10/11/2009

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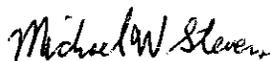
Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Day	1	0	10/13/2009
001	00056	Flow Rate	1/Day	1	0	10/14/2009
001	00056	Flow Rate	1/Day	1	0	10/15/2009
001	00056	Flow Rate	1/Day	1	0	10/19/2009
001	00056	Flow Rate	1/Day	1	0	10/20/2009
001	00056	Flow Rate	1/Day	1	0	10/21/2009
001	00056	Flow Rate	1/Day	1	0	10/22/2009
001	00056	Flow Rate	1/Day	1	0	10/23/2009
001	00056	Flow Rate	1/Day	1	0	10/24/2009
001	00056	Flow Rate	1/Day	1	0	10/25/2009
001	00056	Flow Rate	1/Day	1	0	10/26/2009
001	00056	Flow Rate	1/Day	1	0	10/27/2009
001	00056	Flow Rate	1/Day	1	0	10/30/2009

Please notify this office in writing within 21 days receipt of this letter your intentions to resolve items 13 through 15 along with the facility's intention to tie into the sanitary sewers once the lease with the City of Cleveland is finalized.

Please be advised that such instances of noncompliance 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/mt

cc: Steve Price, Operation Supervisor