



**Environmental  
Protection Agency**

Jim Stumbo, Governor  
Les Fisher, Lt. Governor  
Chris Leveski, Director

October 28, 2010

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

Mr. Steve Price  
Facility Manager  
Air BP – Cleveland Hopkins Airport  
6200 Riverside Drive  
Cleveland Ohio 44135

Dear Mr. Price

On September 21, 2010, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Robert Milla and you. 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 has recently signed a 20 year lease with the City of Cleveland to operate at the current location.
5. No maintenance activity is occurring in the maintenance shop. Air BP has no intention of leasing out the maintenance shop area.
6. All vehicle oil changes are performed off site. The facility's vehicles are also washed off site.
7. The facility's Spill Prevention Control & Countermeasure plan was last amended in July 2009.
8. Parsons Engineering is still being contracted to perform groundwater sampling once per year.
9. 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 until recently been operating without a lease.

10. Waid Corporation continues to be contracted to pump out the holding tank on an as needed basis
11. The settling ponds were both visually clear and free of oil sheens. No discharge was occurring from the second pond.
12. All samples which are collected are iced down and shipped overnight by FedEx to Test America laboratories.
13. Based on the last inspection letter dated November 20, 2009, testing for pH is now being conducted on site.
14. An Ecosense pH meter was purchased and is used to test for pH.
15. The pH meter is calibrated with buffer solutions of 4.0 and 7.0.
16. It was discussed that phenol and Naphthalene were both cited for frequency violations in August 2010. On page 10 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. You indicated this was an oversight. You indicated that a sample would be collected and these parameters would be tested for and reported the following month. Review of September's electronic discharge monitoring report shows that these parameters were reported and were both below the laboratory detection level.
17. It was discussed that the frequency violations which were occurring prior to the last inspection on November 10, 2009 have been eliminated. This was accomplished by better understanding how to complete the monthly electronic discharge monitor reporting form and how the Agency's Surface Water Information Management system runs compliance.
18. It should be noted that the frequency of the Additional Pollutant Monitoring required in Part II Letter E of the permit has been reduced. The semi-annual sampling requirement has been eliminated and the sampling is now only required at the time of permit renewal. The data is required to be submitted with the permit renewal application.

This office has recently reviewed your self-monitoring reports covering the period November 1, 2009 through September 30, 2010 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:

### Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	34694	Phenol	1/Quarter	1	0	08/01/2010
001	34696	Naphthalene	1/Quarter	1	0	08/01/2010

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**Please notify this office in writing within 21 days receipt of this letter your intentions to tie into the sanitary sewers.**

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*

Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt