

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 22, 2011

RE: GUTTMAN REALTY COMPANY
BULK TERMINAL STORAGE
PERMIT NO. 3IG00033
PORTAGE COUNTY
AURORA

Mr. David Mick, Terminal Manager
Guttman Realty Company
1521 S. Chillicothe Road
Aurora, Ohio 44202

Dear Mr. Mick:

On March 22, 2011, an inspection of the above referenced facility was conducted. The facility was represented by you. The purpose of the inspection was to: (1) visually examine each permitted outfall (2) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (3) determine required additional actions to be undertaken as part of the permit renewal process.

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

1. The current NPDES permit is for the discharge of stormwater from the facility's earthen dikes and loading rack areas.
2. Fuel is delivered to the facility by pipeline.
3. Ethanol is delivered to the facility via truck.
4. No automobile/truck maintenance is performed at the facility. Maintenance is only performed on 2 lawn tractors.
5. Northcoast Lab out of Streetsboro collects the NPDES permit effluent samples and performs the laboratory analysis.
6. Northcoast Lab is also responsible for electronically submitting the effluent data to Ohio EPA's Surface Water Information Management System (SWIMS).
7. The facility is required to have a contract with Northcoast Lab which authorizes them to electronically submit the facility's effluent data via SWIMS.
8. The facility has two loading racks. Each rack has three lanes.
9. Stormwater/snow melt from the west loading rack is routed to an oil/water separator which flows to a lagoon and then ultimately discharges through outfall 3IG00033001.
10. Stormwater/snow melt from the east loading rack is also routed to an oil/water separator and is then discharged via outfall 3IG00033003.

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11. Chem Tron is contracted to clean the oil/water separators of sediment and sludge.
12. You indicated that the west oil/water separator was cleaned 3 years ago and the east oil/water separator was cleaned 4 years ago.
13. The oil/water separators are inspected daily for the high level light on the product side.
14. The product side of the oil/water separators is stick tested 1/week. If the tank is more than half full, it is pumped out and stored in another tank.
15. Outfalls 3IG00033001, 3IG00033002, and 3IG00033004 discharge to Tinkers Creek.
16. Outfall 3IG00033003 discharges to Sunny Lake.
17. No discharges at the outfalls were observed.
18. The facility is served by the City of Aurora Wastewater Treatment Facility and city water.
19. Although there are no numerical limits for total suspended solids, COD, and BTEX, many of the values being reported are elevated. On March 24, 2011 an email containing the facility's reported effluent data was sent to you for your review. **This office is requesting a written response within 14 days receipt of this letter indicating the cause for such elevated effluent concentrations. In addition to the reason for the elevated concentrations, please indicate what actions are going to be taken to reduce the concentrations of these pollutants being discharged to Waters of the State.**
20. The facility's renewal permit is currently on hold until your response is received by this office. The response letter will be taken into consideration in the development of the facility's draft NPDES permit.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2008 through March 31, 2011 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	6.5	6.29	6/18/2009

No frequency or code violations were noted.

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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