



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

October 29, 2007

RE: GUTTMAN REALTY CO
DBA BULK TERMINAL STORAGE
3IG00033
PORTAGE COUNTY

Mr. Richard M. Guttman, President
Guttman Realty Company dba Bulk Terminal Storage
1521 S. Chillicothe Road
Aurora, OH 44202

Dear Mr. Guttman:

On October 18, 2007, this writer conducted a compliance evaluation inspection of the Guttman Realty Company bulk storage facilities located at 1519 and 1521 Chillicothe Road, Aurora, Portage County. I was accompanied by Dave Mick, Area Supervisor. The purpose of the inspection was to evaluate compliance with NPDES Permit No. 3IG00033*GD.

General

Guttman Realty Company operates bulk storage facilities at 1519 and 1521 Chillicothe Road. Gasoline, diesel fuel, fuel oil, kerosene, and ethanol products arrive and pass through by pipeline and by tanker trucks. The current NPDES permit is for the discharge of storm water from the facility's earthen dikes and loading rack areas. Up until the year 2005 the Aurora Terminal and Transportation, Inc. and Williams Energy Ventures Aurora Terminal held individual NPDES permits 3IG00033 and 3IG00080, respectively. In 2006 the permits were consolidated under Guttman Realty Company dba Bulk Terminal Storage NPDES Permit 3IG00033*GD. Sanitary sewage is contained in a holding tank for the main office (east side of the property); a septic system serves the needs for the restrooms on the west side of the property. The discharge from this septic system was observed near the facility entrance in the South Chillicothe Road ditch.

Inspection observations

At the time of the inspection the only outfall with any appreciable flow was outfall 001. No visual problems were noted. Sanitary sewage is contained in a holding tank for the main office (east side of the property); a septic system serves the needs for the restrooms on the west side of the property. The discharge from this septic system was observed near the facility entrance in the South Chillicothe Road ditch. Mr. Mick was told that this discharge is unacceptable and that it would have to be eliminated by connecting to the available sanitary sewers. The holding tank should also be eliminated as sanitary sewers are available.

Their descriptions are as follows:

Sampling Station	Description of Location
3IG00033001	Lagoon discharge at end of pipe located at the southwest end of property (intersection of State Road 43 and private entrance road) prior to discharge to Tinkers Creek via roadside ditch and unnamed tributary. (West Side north secondary containment area drain). (Lat: 41 N 16' 34"; Long: 81 W 20' 44")

- 3IG00033002 Dike drainage discharge at end of pipe located at the southwest corner of dike area prior to discharge to Tinkers Creek via roadside ditch and unnamed tributary. (West Side south secondary containment area drain).
 (Lat: 41 N 16' 34"; Long: 81 W 20' 37")
- 3IG00033003 (Previously 3IG00080001) Discharge from southeast corner of southeast containment dike to a swale leading to the unnamed tributary of Sunny Lake. (East side easterly two secondary containment area drains and swale).
 (Lat: 41 N 16' 37"; Long: 81 W 20' 26")
- 3IG00033004 (Previously 3IG00080002) At a point representative of discharge from the northwest and southwest containment dikes. (East side westerly two secondary containment drains).
 (Lat: 41 N 16' 37"; Long: 81 W 20' 32")

A review of your compliance history for the time period of April 2005 through August 2007 indicates the following violations of your NPDES permit 3IG00033:

Numeric Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
003	00400	pH	1D Conc	6.5	6.31	11/16/2006
001	00400	pH	1D Conc	6.5	.	4/25/2007
002	00400	pH	1D Conc	6.5	.	4/25/2007
003	00400	pH	1D Conc	6.5	.	4/25/2007
004	00400	pH	1D Conc	6.5	.	4/25/2007
001	00400	pH	1D Conc	6.5	.	5/25/2007
002	00400	pH	1D Conc	6.5	.	5/25/2007
003	00400	pH	1D Conc	6.5	.	5/25/2007
004	00400	pH	1D Conc	6.5	.	5/25/2007
002	00400	pH	1D Conc	6.5	.	6/25/2007
003	00400	pH	1D Conc	6.5	.	6/25/2007
004	00400	pH	1D Conc	6.5	.	6/25/2007

Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
4/1/2005	001	00056	Flow Rate	1/Month	1	0
4/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
4/1/2005	002	00530	Total Suspended Solids	1/Month	1	0
4/1/2005	002	00056	Flow Rate	1/Month	1	0
5/1/2005	001	00056	Flow Rate	1/Month	1	0
5/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
5/1/2005	002	00056	Flow Rate	1/Month	1	0
6/1/2005	001	00056	Flow Rate	1/Month	1	0

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
6/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
6/1/2005	002	00056	Flow Rate	1/Month	1	0
7/1/2005	001	00056	Flow Rate	1/Month	1	0
7/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
7/1/2005	002	00056	Flow Rate	1/Month	1	0
8/1/2005	001	00056	Flow Rate	1/Month	1	0
8/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
8/1/2005	002	00056	Flow Rate	1/Month	1	0
9/1/2005	001	00056	Flow Rate	1/Month	1	0
9/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
9/1/2005	002	00056	Flow Rate	1/Month	1	0
10/1/2005	001	00056	Flow Rate	1/Month	1	0
10/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
10/1/2005	002	00056	Flow Rate	1/Month	1	0
11/1/2005	001	00056	Flow Rate	1/Month	1	0
11/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
11/1/2005	002	00056	Flow Rate	1/Month	1	0
12/1/2005	001	00056	Flow Rate	1/Month	1	0
12/1/2005	001	00340	Chemical Oxygen Demand	1/Month	1	0
12/1/2005	002	00056	Flow Rate	1/Month	1	0
1/1/2006	001	00056	Flow Rate	1/Month	1	0
1/1/2006	001	00340	Chemical Oxygen Demand	1/Month	1	0
1/1/2006	002	00056	Flow Rate	1/Month	1	0
2/1/2006	001	00530	Total Suspended Solids	1/Month	1	0
2/1/2006	001	00400	pH	1/Month	1	0
2/1/2006	001	00550	Oil and Grease, Total	1/Month	1	0
2/1/2006	001	00056	Flow Rate	1/Month	1	0
2/1/2006	001	00340	Chemical Oxygen Demand	1/Month	1	0
2/1/2006	002	00530	Total Suspended Solids	1/Month	1	0
2/1/2006	002	00400	pH	1/Month	1	0
2/1/2006	002	00550	Oil and Grease, Total	1/Month	1	0
2/1/2006	002	00335	Chemical Oxygen Demand	1/Month	1	0
2/1/2006	002	00056	Flow Rate	1/Month	1	0
3/1/2006	001	00056	Flow Rate	1/Month	1	0
3/1/2006	001	00340	Chemical Oxygen Demand	1/Month	1	0
3/1/2006	002	00056	Flow Rate	1/Month	1	0
4/1/2006	001	00056	Flow Rate	1/Month	1	0
4/1/2006	001	00340	Chemical Oxygen Demand	1/Month	1	0
4/1/2006	002	00056	Flow Rate	1/Month	1	0
5/1/2006	001	00056	Flow Rate	1/Month	1	0
5/1/2006	001	00340	Chemical Oxygen Demand	1/Month	1	0
5/1/2006	002	00056	Flow Rate	1/Month	1	0
12/1/2006	001	34694	Phenol	2/Year	1	0
12/1/2006	001	34696	Naphthalene	2/Year	1	0

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Violation		Reporting		Sample			
Date	Station	Code	Parameter	Frequency	Expected	Reported	
12/1/2006	002	34694	Phenol	2/Year	1	0	
12/1/2006	002	34696	Naphthalene	2/Year	1	0	
12/1/2006	003	34694	Phenol	2/Year	1	0	
12/1/2006	003	34696	Naphthalene	2/Year	1	0	
12/1/2006	004	34694	Phenol	2/Year	1	0	
12/1/2006	004	34696	Naphthalene	2/Year	1	0	
1/1/2007	003	00550	Oil and Grease, Total	1/Month	1	0	

In addition, our files do not contain noncompliance notifications as required in Part III, Section 12. This is considered a separate violation of your permit.

Dave Mick and I discussed the method to be used to provide a flow estimate for the four outfalls when completing the 4500 reports. It is preferable to install a rain gauge at the site to obtain an accurate rainfall measurement. Currently Mr. Mick is obtaining rainfall data from the Cleveland Airport. This rainfall data in conjunction with known surface area square footage, tributary to each outfall, is used to calculate the volume of water collected behind each dike. The flow value is required to be reported once per month. The total gallons discharged should be based upon the volume collected since the end of the last discharge event divided by the duration of the discharge in one day (12 a.m. to 12 p.m.). The total gallons reported for any one day must not be obtained by dividing the monthly rainfall volume by 30 days.

No later than November 9, 2007, we request that you respond in writing to this office with an explanation for the above listed violations and a procedure to accurately calculate the flows required by your NPDES permit. If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Engineer
Division of Surface Water

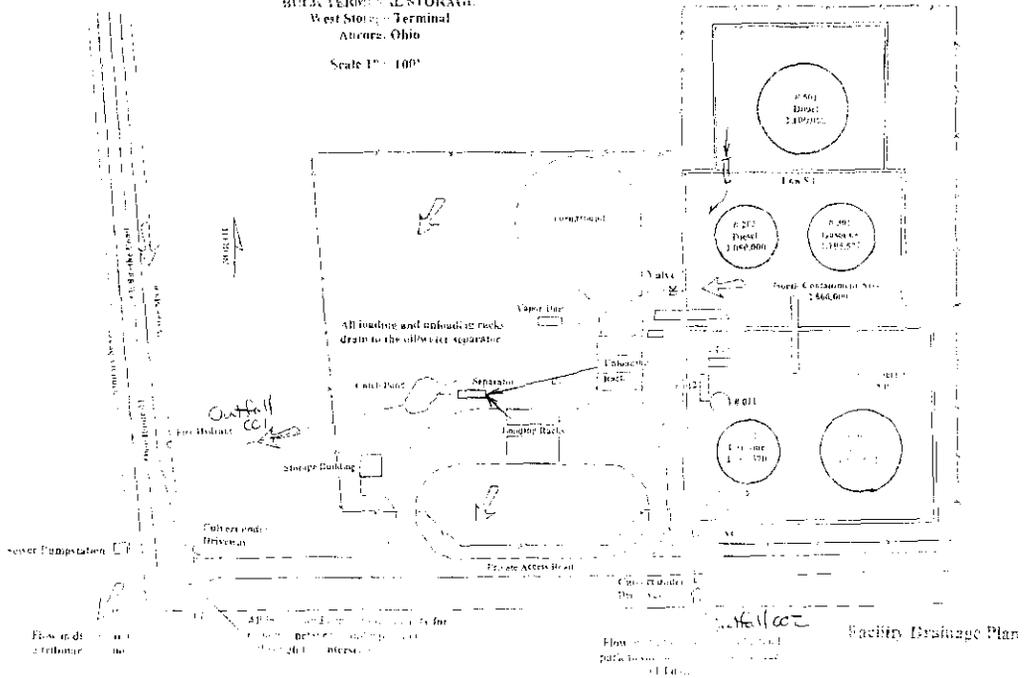
PPR/mt

File: Industrial Permit/Compliance

GUTTMAN COMPANY

BULK TERMINAL STORAGE
West Storage Terminal
Ancora, Ohio

Scale 1" = 100'



Facility Drainage Plan

