



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

November 20, 2009

RE: TRUMBULL COUNTY  
HUBBARD TOWNSHIP  
TRUCK WORLD TRUCK STOP  
NPDES PERMIT NO. OH0084000  
OHIO EPA PERMIT NO. 3IG00040

Mr. Barry Brocker, CFO  
Truck World, Inc.  
P.O. Box 248  
Hubbard, Ohio 44425

Dear Mr. Brocker:

An inspection was conducted by the undersigned of the wastewater treatment system serving the above referenced facility on October 22, 2009. In addition to you, also in attendance was Mr. Steve Pettit of Cardinal Laboratory. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the NPDES permit.

The existing treatment components consist of an oil water separator. The outflow from the system discharges to a tributary of Little Yankee Creek.

At the time of the inspection, the general operation and maintenance of the system appeared to be satisfactory. The effluent was clear, with a recorded pH value of 7.40. There was no observable adverse impact to the receiving stream.

A review of the facility's Discharge Monitoring Reports (EPA Form 4500 or DMRs) received by Ohio EPA for the period, January 2008 - October 2009, indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2008	001	Oil and Grease, Hexane	1D Conc	10	10.4	3/18/2008
January 2008	001	Oil and Grease, Hexane	1D Conc	10	52.7	1/29/2008
July 2009	001	pH	1D Conc	6.5	5.93	7/22/2009
September 2009	001	pH	1D Conc	6.5	2.97	9/24/2009

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

In addition to the above, our review of the facility's data reporting procedures noted the following:

Mr. Barry Brocker, CFO  
Truck World, Inc.  
November 20, 2009  
Page 2

- The facility's DMRs are currently being submitted and certified by Ms. Tracey Duttry. While e-DMR allows permitted facilities to enter, electronically sign, and submit DMRs, federal and state regulations specify who can legally sign and certify the reports. Pursuant to Part III of the NPDES permit, DMRs can **only** be signed and certified by a facility's responsible official, i.e. corporate officer, or by a duly authorized representative of said official. Pursuant to Title 40 Code of Federal Regulations (40 CFR) 122.22 (b):

***A person is a duly authorized representative only if:***

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***
- (3) The written authorization is submitted to the Director.***

The PIN, or Personal Identification Number, uniquely identifies and serves as the electronic signature of the responsible or duly-authorized official. PIN assignments must be consistent with USEPA's Cross Media Electronic Reporting Regulation (CROMERR). Please confirm that Ms. Duttry meets the above requirements.

Under the e-DMR program, the PIN holder can delegate staff with the privilege to view, create and edit DMRS...but not submit eDMR data. These individuals must have an eBusiness Center account, but do not need a PIN. Since they do not have the privilege of actually certifying the data, the law does not require them to have a PIN. Once these users perform the data entry or review the data, the DMR is saved and the PIN holder can log on and submit the DMR.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mt

File: Industrial/PC/Truck World