

**Environmental  
Protection Agency**

with the Honorable **Governor**  
and the Honorable **Lt. Governor**  
and the Honorable **Director**

October 26, 2011

RE: ASHTABULA COUNTY  
VILLAGE OF ANDOVER  
O&P OIL & GAS, INC.  
NPDES PERMIT NO. OHR000004  
OHIO EPA PERMIT NO. 3GR01180\*DG  
INDUSTRIAL STORM WATER

Nancy Kister  
O&P Oil & Gas, Inc.  
P.O. Box 1298  
Andover, OH 44003

Dear Ms. Kister:

On October 4, 2011, Ohio EPA conducted an inspection of O&P Oil & Gas, Inc., located at 220 Center Street, Village of Andover, Ashtabula County (facility). During the inspection, the facility was represented by you and John Skleres, Vice President. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01180\*DG. The inspection documented the following:

**General Information**

The facility is a bulk petroleum storage and distribution plant. The facility's industrial activities are currently classified under U.S. Department of Labor's Occupational Safety and Health Administration's Standard Industrial Classification (SIC) Code 5171: Petroleum Bulk Stations and Terminals.

**General Storm Water Permit**

Part I.C.3.e of the General Storm Water Permit does not authorize storm water discharges associated with petroleum bulk stations and terminals with the standard industrial classification (SIC) code 5171. As a result, the facility must submit to Ohio EPA a notice of termination (NOT), in accordance with the applicable instructions, in order to terminate the General Storm Water Permit. The NOT must be completed and submitted to:

Ohio Environmental Protection Agency  
General Permit Program  
P.O. Box 1049  
Columbus, OH 43216-1049

For your convenience, the NOT and applicable instructions can be obtained from the following website:

<http://www.epa.ohio.gov/dsw/storm/stormform.aspx>

### **Individual Industrial NPDES Permit**

Since the facility discharges to "surface waters of the State," an individual industrial NPDES permit must be obtained. In order to obtain individual industrial NPDES permit coverage the following forms and appropriate fee must be submitted to Ohio EPA in accordance with the applicable instructions:

- NPDES Form 1 Application
- NPDES Form 2C Application
- Ohio EPA Antidegradation Addendum

For your convenience, the above forms and instructions can be obtained from the following website:

<http://www.epa.ohio.gov/dsw/permits/npdesform.aspx>

### **Facility Inspection**

The facility had developed a spill, prevention, control, and countermeasures (SPCC) plan, dated January 26, 2008. The monthly and annual inspections, detailed within Sections 4.3.2 and 4.3.3 of the SPCC plan, are being performed. The last monthly inspection and annual inspection performed occurred on August 2, 2011 and May 1, 2011. In addition, records of dike drainage are maintained and include the drainage dates of July 1, 2011, April 1, 2011, November 5, 2010, January 15, 2010, July 13, 2009, September 19, 2008, and June 18, 2008.

The facility must implement specific corrective measures to address the following:

- Trucks are washed outdoors in an area that drains to "surface waters of the State." Ohio EPA records do not indicate that the facility has received an NPDES permit authorizing the discharge of pollutants to "waters of the state." The discharge of wastewater from the facility to "surface waters of the state" constitutes a violation of Ohio Revised Code Chapter 6111.04.

Mr. Skleres stated that the truck washing activities would be terminated. In the event that truck washing activities at the facility will occur, one of the following corrective actions must be implemented:

- i. Begin utilizing an offsite commercial vehicle wash;
- ii. Install a holding tank pursuant Ohio Administrative Code Chapter 3745-42-11 and submit a permit-to-install (PTI) application that includes the following:

- Form A
- Form B8; and
- Antidegradation Addendum

Approval for the holding tank must be obtained from Ohio EPA prior to the installation of the holding tank occurring. For your convenience, the PTI forms can be obtained from the following internet address:

<http://www.epa.state.oh.us/dsw/pti/PTIForms.html>

- iii. Install a re-circulating vehicle washing operation to collect and reuse wastewaters; or
- iv. Connect the onsite vehicle washing operation to an available sanitary sewer, whereby the generated wastewater will be properly treated by a treatment works.
- Floor drains are present within the maintenance shop. Mr. Skleres stated that he believed that the floor drains are connected to an oil/water separator that discharges to the Andover sanitary sewer system. In order to verify that the floor drains are not connected to the storm sewer system, Ohio EPA requested dye testing of the floor drains be performed to verify the connection location.

Within 30 days of receiving this correspondence, please submit a letter detailing the corrective actions that have been implemented to address the above deficiencies. In addition, Mr. John Schmidt will be the facility's Ohio EPA contact for the individual industrial NPDES permit. Should you have any questions regarding this matter, please contact Mr. Schmidt at your earliest convenience at (330) 963-1175 or via e-mail [john.schmidt@epa.ohio.gov](mailto:john.schmidt@epa.ohio.gov).

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM/cs

cc: John Schmidt, Ohio EPA, DSW, NEDO  
Jason Fyffe, Ohio EPA, DSW, CO  
Michael Joseph, Ohio EPA, DSW, CO