



State of Ohio Environment

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 F
www.epa.state.oh.us



May 22, 2008

Mr. David R. Dysard, AICP
District 2 Deputy Director
317 East Poe Road
Bowling Green, Ohio 43402-1330

Re: April 23, 2008 Henry County Garage Inspection – NOTICE OF VIOLATION

Dear Mr. Dysard:

An inspection of the Ohio Department of Transportation (ODOT) Henry County Garage was conducted on April 23, 2008 by Ohio EPA in order to determine compliance with Ohio regulations related to the underground injection of fluids. A summary of the observations made during the inspection is attached to this letter.

Compliance Issues

During the inspection, Ohio EPA observed or was informed of the following:

1. OAC rules 3745-34-13(A)(7) and -13(G): ODOT has improperly converted a motor vehicle waste disposal well and continues to possess a motor vehicle waste disposal (MVWD) well in violation of OAC rules 3745-34-13(A)(7) and -13(G). This is a continuing violation and shall remain until the well is properly abandoned or converted in accordance with the rules. In the two maintenance bays on the south side of the main building there is a floor drain with a central sump. Mr. Schneiderbauer, garage supervisor, stated that the drain in the central sump was plugged and that motor vehicle waste fluids were pumped out and disposed of properly. A January 30, 2008 letter from ODOT indicates the plug in the central sump is a temporary one. The plug must be permanently installed or the well permanently abandoned in order for the ODOT District 2 Henry County Garage to return to compliance with OAC rules 3745-34-13(A)(7) and -13(G).
2. OAC rule 3745-34-13(A)(3): ODOT does not possess a permit to operate for the disposal of industrial wastes to a Class V injection well. Truck wash rinse water is considered an industrial waste per OAC rule 3745-34-01(LL) and is illegal to discharge into a Class V injection well without a valid permit to operate. ODOT staff stated during the inspection that trucks are currently rinsed off with water in the wash bay on the south west side of the garage. For a full cleaning, the trucks are sent to the Fulton County Garage. The rinse water is collected in a floor drain and discharged through the Class V injection well at the Henry County Garage. ODOT must cease discharging the rinse water to the Class V injection well or obtain a permit to operate to inject this fluid in order to return to compliance.

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

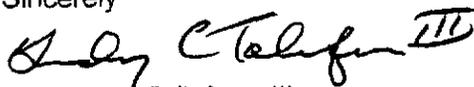
Additional Information Needed

Per OAC rule 3745-34-13(E), Ohio EPA is requesting the following information be submitted within 30 days of the receipt of this letter in order to assess the endangerment the Class V well poses to the underground source of drinking water at the ODOT Henry County Garage location.

1. All analytical results derived from samples of the waste water from washing or rinsing the vehicles and equipment at the ODOT Henry County Garage shall be submitted to Ohio EPA. Staff at the ODOT Henry County Garage indicated that samples of the waste water were collected on at least a monthly basis and submitted for analysis. The results shall be accompanied by:
 - A description of the sampling methods used to collect the samples analyzed;
 - All laboratory data sheets of the analytical results;
 - A table summarizing the results; and
 - Any quality control/ quality assurance data.
2. All documentation concerning the temporary plug installed in the floor drain in the maintenance bays. This should include a scale drawing of the plug and information as to the date it was installed and any maintenance performed on the plug.
3. Documentation related to the collection and disposal of motor vehicle waste from the floor drains of the maintenance bays. This should include any analysis performed on waste samples, procedures for removing the waste from the floor drains and disposal records demonstrating that the waste was properly disposed.
4. Records concerning the maintenance and fluid removal from the oil/water separator or the septic tank at the garage. This shall include the results of any testing performed on the septic system including any smoke tests performed on the Class V well.

If you have any questions please call me at 614-644-2771.

Sincerely



Lindsay C. Taliaferro III
Manager, UIC Program

Cc: Mike Baker, Chief, DDAGW
Shannon Nabors, Chief, NWDO
Tom Allen, Assistant Chief
Ben Bandy, Facilities, ODOT Central Office
Craig Schneiderbauer, Supervisor, ODOT Henry County Garage
Jess Stottsberry, DDAGW-UIC
Val Orr, DDAGW-UIC

OHIO ENVIRONMENTAL PROTECTION AGENCY
CLASS V FIELD INSPECTION REPORT

Inspector's Name: Lindsay Taliaferro III
Date and Time of Inspection: April 23, 2008 at 12:39 p.m.

Facility Name: ODOT Henry County Garage
Street: US Rt 6 and SR 110
City/State/Zip: Napoleon, OH, 43545
County: Henry Township: _____
Phone Number: 413-592-1838

Well Operator: Ohio Department of Transportation (ODOT)
Ownership Status: Federal; State; Private; Public

Parent Company: ODOT
Legal Owner: ODOT District 2
Street: 317 East Poe Road
City/State/Zip: Bowling Green, OH, 43402-1330
Phone Number: 419-353-8131
Contact Person: Henry County Garage – Craig Schneiderbauer, Garage Supervisor.

Nature of Business: Street Building, Maintenance and Repair.

Type of Injection Well: Combination Industrial, Motor Vehicle Waste Disposal with sanitary.

Well Construction: Septic system with leach field

Depth: unknown

Casing Present? yes If yes, type unknown

Injection Fluid Information

Injectate Source (process, operation or maintenance that produces waste):

Waste water from truck washing operation Currently truck washing with only water, no soap, is allowed according to staff. Truck rinse water goes to septic. Trucks washed with soap at Fulton County Outpost.

Motor vehicle waste from maintenance area Drain from maintenance bay has been disconnected according to Garage Supervisor. Indicated that the drain in the sump or collection area of the drain was plugged and the sump was pumped out periodically. This is consistent with the January 30, 2008 letter from ODOT.

Sanitary waste from restrooms.

Injectate Composition: Unknown – Staff indicated that samples had been taken and sent for analysis. No results have been submitted to Ohio EPA.

Possible Contaminants: Currently with temporary plug there is no discharge from Maintenance area but in past would have been oil, grease, transmission fluid, etc.

Currently only rinse water from truck wash area in past soap, oil and grease.

Sanitary from restrooms

Waste water from truck washing operation (currently truck washing with only water, no soap, is allowed according to garage staff. Truck rinse water goes to septic. Trucks washed with soap at ODOT Fulton County Garage).

Average Volume Injected (Gallons/Day/Well): unknown.

Periodicity of Injection Well Use and Injectate Composition: Continuous for sanitary. No discharge currently from maintenance areas. Truck rinse water discharge unknown.

Potential Sampling Points: From floor drains or septic system access points

Private Water Well(s)? Unknown: **Distance to Injection Well** unknown

Any prior or exiting MCL or HA violations? If so, date(s) and contaminant(s) unknown

Previous Problems with the Injection Well(s): Cited in violation for discharging industrial fluids without a permit and for illegally discharging MVWD wastes.

General Comments (appearance of the well(s), susceptibility to spills, etc.)

See attached.

Noncompliance noted? Continue in non-compliance due to temporary nature of plugging floor drain in maintenance bays and due to continued disposal of rinse waters into septic system.

Follow up Necessary? Need documentation on plugging of floor drain in maintenance bays. Also need analytical results of rinsate from rinsing trucks in the bays to ensure compliance with OAC rule 3745-34-07. Need to close the current well or obtain a permit to operate for discharge of the truck wash waters.

Date of Inspection Letter: _____

Notes from April 23, 2008 Inspection of ODOT Henry County Garage.

Inspector: Lindsay Taliaferro III

Arrival Time: 12:39 pm

Checked in with garage employee and later supervisor and was escorted around the site

Main Building:

Floor drain located down the center of the building. 4 trucks, one payloader and a tractor parked in garage. Some old oil staining on floor around drain and a small patch of fresh oil on floor. Escort mentioned that those are cleaned up with oil dry and do not go to floor drain.

Tool bench present in bay but no obvious signs of maintenance.

Tire change area present.

Wash Bay

Central floor drain running down the middle of the bay. Old oil staining on ground near drain. Escort said the bay was used only to rinse the trucks with water. Washing of the trucks with soap occurred at the Fulton County Garage. Power wash equipment was present in the bay. Periodic samples of rinsate are collected including one the day before and sent for analysis. Samples taken 2-3 times a month the escort believed.

Maintenance Bays:

Active maintenance ongoing in bays.

Two trucks in the bay for maintenance (hood number 2544042)

Floor drain runs across the back of both bays and drains to a central sump. Supervisor present at this time and indicated the sump drain was plugged and the sump is periodically emptied. January 30, 2008 letter from ODOT indicates this is a temporary drain.

Oil and oil dry present on floor.

Violations: Continue in non-compliance due to temporary nature of plugging floor drain in maintenance bays and due to continued disposal of rinse waters into septic system. Need documentation on plugging of floor drain in maintenance bays has been submitted. Also need analytical results of rinsate from rinsing trucks in the bays to ensure compliance with OAC rule 3745-34-07. Need to close the current well or obtain a permit to operate for discharge of the truck wash waters.

Housekeeping recommendation: Oil on floor from truck in main bay needs to be cleaned up with oil dry to prevent going into floor drain.

Concluded inspection at 12:48 p.m.