



State of Ohio Environm



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December 6, 2007

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

91 7108 2133 3931 0973 0965

Re: Henry County Garage Inspection – NOTICE OF VIOLATION

Dear Mr. Dysard:

ODOT District 2 is in violation of Rule 3745-34-13(A) of the Ohio Administrative Code (OAC) at the Henry County Garage location. OAC rule 3745-34-13(A) prohibits motor vehicle waste disposal (MVWD) into a Class V injection well and prohibits the injection of industrial wash water wastes into or above an underground source of drinking water without a permit to operate. On October 3, 2007, Ohio EPA representatives inspected the Henry County garage to determine compliance with applicable Underground Injection Control (UIC) rules and regulations. During the site visit, Ohio EPA inspectors observed and documented active and unauthorized injection of automotive maintenance related wastes and wash waters into a Class V well. Based on visual inspection of the many floor drains, it was apparent that the disposal of motor vehicle waste to the floor drains and then into the Class V injection well is a common practice.

On October 22, 2007, Ohio EPA met with ODOT's District 2 officials and discussed violations at the Henry County Garage and the Wood County Garage. During the meeting, ODOT committed to providing Ohio EPA with a report that outlines alternatives to the operations witnessed on October 3, 2007 at the Henry County Garage. With a letter dated November 16, 2007 ODOT's District 2 provided Ohio EPA with a proposal for immediate, intermediate, and permanent solutions for the Henry and Wood County garages.

Ohio EPA has reviewed the November 16th proposal and the following actions must be taken by District 2 to obtain compliance at the Henry County and Wood County Garages:

1. Immediately cease all discharges of motor vehicle wastes from maintenance areas to the Class V wells. This can be done by implementing intermediate actions 1 through 4 on page 3 of the November 16th communication. Specifically District 2 needs to:

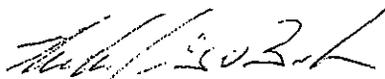
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

- a. Stop all drainage from the mechanics bays at the Henry County and Wood County Garages so that motor vehicle waste fluids are stopped from entering the leach field.
 - b. Permanently seal off the oil/water separator from the septic tank with a permanent plug of the discharge pipes from the oil/water separator.
 - c. Pump out and clean the septic tank with a power wash system to eliminate any residual oils from discharging to the Class V well.
 - d. Run a smoke test to verify that all inappropriate drain lines to the leach field have been closed.
 - e. Submit notifications and a closure report as required per OAC rule 3745-34-13(F).
2. Apply for and obtain two emergency permits per OAC rule 3745-34-19 for the industrial wash water waste discharges to the leach field from the truck wash operations at both the Henry County and Wood County Garages. These emergency permits would require compliance with OAC rule 3745-34-07(A) and at a minimum:
- a. Only be valid until June 30, 2008.
 - b. Require regular sampling during high flow events for oil and grease, chloride, sodium, and other constituents that may be present at levels of concern.
3. Determine a long term solution to the discharge of industrial wash waters to the leach field including if necessary obtaining a permit to operate per OAC rule 3745-34-16. This long term solution must be implemented prior to the emergency permits expiring.

Should Ohio EPA discover any further illegal or unauthorized injection activities, enforcement action may be taken. It is also strongly recommended that ODOT re-evaluate all of its garages reported to be "snow melt only".

Should you have any questions, please contact Lindsay Taliaferro III, Jess Stottsberry or Valerie Orr of my staff at (614) 644-2752.

Sincerely,



Michael G. Baker, Chief
Division of Drinking and Ground Waters

cc: Lindsay C. Taliaferro III, UIC Manager, DDAGW
Beth Messer, Compliance Assurance Manager, DDAGW
Shannon Nabors, Chief, NWDO
Mark Spagnuolo, Facilities Administrator, ODOT
Valerie Orr, Class V Coordinator, DDAGW