



State of Ohio Environment



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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 ~~Wood County~~ Garage Inspection – NOTICE OF VIOLATION

Dear Mr. Dysard:

An inspection of the Ohio Department of Transportation (ODOT) Wood 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 documented as 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. Ms. Courtney, garage supervisor, stated that the drain in the central sump went to the oil/water separator which had been disconnected from the septic system and leach field. The oil/water separator would then be periodically pumped and the waste disposed of properly.

Inspection of the central sump indicated the presence of a four inch capped PVC riser pipe located about where the drain should have been. No other drain was visible in the central sump. A January 30, 2008 letter from ODOT indicates the plug was installed in the central sump and that the plug is a temporary one. This letter also indicated the sump would be periodically pumped out.

Documentation must be submitted to verify how the central sump has been plugged. Any plug installed in either the oil/water separator or the central sump must be permanently installed or the well permanently abandoned in order for the ODOT District 2 Wood 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 into 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

Ted Strickland, Governor
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a valid permit to operate. ODOT staff stated during the inspection that trucks are currently rinsed off with water with a discharge to the floor drains. For a full cleaning, the trucks are sent to the Northwood Outpost. The rinse water is collected in a floor drain and discharged through the Class V injection well at the Wood 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.

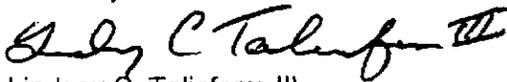
Additional Information Needed

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 Wood 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 Wood County Garage shall be submitted to Ohio EPA. 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. 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.
3. 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
Violet Courtney, Supervisor, ODOT Wood 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 11:44 a.m.

Facility Name: ODOT Wood County Garage
Street: 13982 Mitchell Road
City/State/Zip: Bowling Green, OH, 43402-9704
County: Wood
Phone Number: 419-353-8131

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: Wood County Garage - Violet Courtney, 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, type unknown Casing Cemented? Y/N

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 Garage Supervisor. Truck rinse water goes to septic. Trucks washed with soap at Northwood Outpost.

Motor vehicle waste from maintenance area Drain from maintenance bay has been disconnected according to Garage Supervisor. Supervisor indicated that the oil/water separator was disconnected and is now a tank and is pumped out periodically. January 30th letter from ODOT indicated a temporary plug in the sump area of the drain prior to going to the oil/water separator. A four inch riser pipe was observed during the inspection where the drain would be. Riser pipe was covered in oil and came up about 8 inches from the bottom of the sump and was capped off. Maintenance worker indicated the sump drained but appeared confused by the question.

Sanitary waste from restrooms.

Injectate Composition: Unknown – no samples taken or analysis results submitted

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 bathrooms

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

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 (December 6, 2007 and February 15, 2008 letters).

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. Need to explain oil drum in wash bay. Supervisor indicated the plans to hook up to a nearby sewer were approved and construction should begin this summer. Upon hook up to sewer to ensure proper closure of current well.

Date of Inspection Letter: _____

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

Inspector: Lindsay Taliaferro III

Arrival Time: 11:44 am

Checked in with garage supervisor and gained permission to inspect the site unescorted.

Main Building:

Floor drain located down the center of the building. 12 trucks parked in garage. Some old oil staining on floor around drain.

Truck with license number T2 862 has oil leak onto floor beneath it. Not to drain.

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

Pick up with license number T2 542 has been recently rinsed off with water at east end of garage. No sign that soap was used. Looks like just water from nearby 1 inch hose and low pressure nozzle. No high pressure wash hose or nozzle appeared to be present.

Tire change area present. Some shelves have windshield wiper fluid bottles on them but no other maintenance fluids.

Wash Bay

One entrance blocked by trailer and plow blade. Acetylene and oxygen tanks present at north end of bay. Bay does not appear to be currently used as a wash bay.

Central floor drain running down the middle of the bay. Old oil staining on ground near drain.

Two drums present - one marked "used motor oil".

High pressure hose and high pressure wand with nozzle present.

Maintenance Bays:

Active maintenance ongoing in bays.

One truck in the bay for maintenance (hood number 2544042)

Floor drain runs across the back of both bays and drains to a central sump. Four inch riser pipe is present in central sump. Pipe rises about 8 inches off of sump bottom and is covered with oil. Riser pipe is capped off. Maintenance worker in the bay appeared confused when asked if the sump drained or was a tank and if it drained where the sump drains to. He did indicate that to his knowledge it did drain. Supervisor in exit interview indicated the sump drains to an oil water separator that has been converted to a tank and that is periodically emptied.

Oil and oil dry present on floor.

Closet with oil drums on pallet/ spill collection devices present on west side of bay.

Out buildings – No floor drains apparent.

Exit interview with Supervisor

Supervisor indicated that the garage is still on the septic tank and leach field but plans have been approved for hooking up to sewer and she believes that will occur as early as this summer. Confirmed that maintenance area is disconnected from septic system and oil water separator is now a tank. Also, confirmed that no soap is used in washing the trucks. They are just rinsed with water. If they need washing they are taken to the Northwood outpost.

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. 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. Need to explain oil drum in wash bay. Supervisor indicated the plans to hook up to a nearby sewer were approved and construction should begin this summer. Upon hook up to sewer to ensure proper closure of current well.

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 12:12 p.m.