



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

May 3, 2012

Brian Grannan, Environmental Coordinator  
Industrial Container Services – OH, LLC  
1385 Blatt Blvd.  
Gahanna, OH 43230

**Re: Industrial Container Services OH LLC  
NPDES Permit 4IN00108/ OH0101605  
Compliance Evaluation Inspection  
Franklin County**

Dear Mr. Grannan:

On April 25, 2012, a Compliance Evaluation Inspection was conducted at the Industrial Container Services OH LLC. Present for the inspection were you, the environmental Coordinator of Industrial Container Services and Harry Kallipolitis and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

**Findings**

1. Attached is a compliance data between April 2007 and April 2012. Since January 2010, the facility has largely been compliant with effluent limits.
2. The facility has installed a storm water treatment system which consists of storm water ponds, a Stormceptor unit, and an AbTech Smart Pak/ Smart Sponge® Water Filter Unit. It appears that the system was installed as required by Permit to Install #707280 although some time deadlines were missed due to weather conditions.
3. A logbook should be maintained which details any maintenance done to the treatment system.
4. You requested guidance on how to deal with cat tails or other vegetation within the storm water ponds. Based on our evaluation and consultation with various state agencies, we recommend the mechanical removal method found at the following link: <http://ohioline.osu.edu/a-fact/0011.html>.

5. You also asked for what slope should be used for the catch basin aprons. Our affiliation with apron design associated with the proper storm sewer catch basins is limited in scope. I would recommend contact Cornell Robertson with Franklin County Engineers Office at 614-525-3359 or Gahanna City Engineer's Office at 614-471-6919 and request any standard specification relating to storm sewer catch basins and aprons.
6. There is a large pile of dirt staged northwest of Outfall 001 as a result of the construction of the treatment system. Storm water controls such as silt fencing should be installed as soon as possible. Vegetative cover should be seeded after the dirt has been graded and spread.
7. One point we did not discuss during the inspection was the requirement of a marker at the outfall. The NPDES permit required the marker to be in place by September 1, 2011. **The marker should be installed as soon as possible.** Please submit documentation when the marker is installed.
8. Ohio EPA is interested in observing cleanout of the Stormceptor. If possible, please contact Harry Kallipolitis or myself prior to clean out.

Enclosed is the Compliance Inspection Report. **Please provide documentation when the outfall marker is installed.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,



Cole Miller  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

ec: Cole Miller

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00108	OH0101605	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
4/25/2012	9:00 AM	10:30 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Industrial Container Services OH LLC 1385 Blatt Blvd. Gahanna, OH 43230	5/1/2011
	Permit Expiration Date
	4/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Brian Grannan, Environmental Coordinator	
Name and Title of Responsible Official	Phone Number
Brian Grannan, Environmental Coordinator	(614) 864-1900

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S*	NPDES Compliance	Marker needs to be placed at outfall
S	Operations & Maintenance	
S*	Facility Site Review	Storm water controls should be installed to minimize impacts from construction related activities.
S	Collection System	
S	Flow Measurement	
S	Receiving Waters	
N/E	Laboratory	

Comments:

Signatures	
 4-27-12	 4/27/12
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

## Compliance Data for Industrial Container Services OH LLC between 4/1/2007 to 4/1/2012

### Summary

Permit Effluent Limit Violations: 14  
 Permit Effluent Code Violations: 0  
 Permit Effluent Frequency Violations: 0  
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2007	001	Zinc, Total Recoverabl	1D Conc	202	524.	4/25/2007
July 2007	001	Zinc, Total Recoverabl	1D Conc	202	231.	7/18/2007
July 2007	001	Copper, Total Recovers	1D Conc	34	44.2	7/19/2007
August 2007	001	Copper, Total Recovers	1D Conc	34	43.4	8/22/2007
January 2008	001	Copper, Total Recovers	1D Conc	34	69.2	1/31/2008
February 2008	001	pH	1D Conc	9.0	9.11	2/29/2008
February 2008	001	Zinc, Total Recoverabl	1D Conc	202	255.	2/29/2008
February 2008	001	Copper, Total Recovers	1D Conc	34	72.2	2/29/2008
August 2008	001	Copper, Total Recovers	1D Conc	34	38.5	8/25/2008
August 2009	001	Zinc, Total Recoverabl	1D Conc	202	225.	8/28/2009
August 2009	001	Copper, Total Recovers	1D Conc	34	44.9	8/28/2009
January 2010	001	Zinc, Total Recoverabl	1D Conc	202	212.	1/25/2010
January 2011	001	pH	1D Conc	6.5	6.44	1/26/2011
January 2012	001	Copper, Total Recovers	1D Conc	23	25.9	1/23/2012

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters..... Y
- (c) Products and production rates conform with permit application ..... Y
- (d) Flows and loadings conform with NPDES permit ..... Y
- (e) Treatment processes are as described in permit application..... Y
- (f) New treatment process added since last inspection..... Y
- (g) Notification given to State of new, different or increased discharges ..... Y
- (h) All discharges are permitted ..... Y
- (i) Number and location of discharge points are as described in permit ..... Y

Comments: Facility has installed a new storm water treatment system.

**SECTION E: COMPLIANCE**

- (a) Any significant violations since the last inspection ..... N
- (b) Permittee is taking actions to resolve violations ..... N/A
- (c) Permittee has a compliance schedule ..... Y
- (d) Permittee is meeting compliance schedule ..... Y

Comments:

**SECTION F: OPERATION AND MAINTENANCE**

- (a) Standby power available ..... N/A  
    If yes, what type?
- (b) Adequate alarm system available for power or equipment failures ..... N/A
- (c) All treatment units in service other than backup units ..... Y
- (d) Wastewater Treatment Works classification ..... N/A
- (e) Operator of Record holds unexpired license of class required by Permit ..... N/A  
    Class held:
- (f) Copy of certificate of Operator of Record displayed on-site ..... N/A
- (g) Minimum operator staffing requirements fulfilled ..... N/A
- (h) Routine and preventative maintenance scheduled and performed ..... Y
- (i) Any major equipment breakdown since last inspection ..... N
- (j) Operation and maintenance manual provided and maintained ..... Y
- (k) Any plant bypasses since last inspection ..... N
- (l) Regulatory agency notified of bypasses .....  
    By MOR  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection ..... N

Comments:

**SECTION G: RECORD KEEPING**

- a) Log book provided..... N\*
- b) Format of log book (i.e. computer log, hard bound book)
- c) Log book(s) kept onsite in an area protected from weather..... N/A
- d) Log book contains the following:
  - i) Identification of treatment works..... N/A
  - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 ..... N/A
  - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) ..... N/A
  - iv) Laboratory results (unless documented on bench sheets) ..... N/A
  - v) Identification of person making log entries ..... N/A
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred?.... N/A

Comments: Ohio EPA recommended keeping a log book of all maintenance done to the storm water treatment system.

**SECTION H: COLLECTION SYSTEM**

- a) Percent combined system: ..... N/A
- b) Any collection system overflows since last inspection..... N/A  
CSO  SSO
- c) Regulatory agency notified of overflows ..... N/A
- d) CSO O&M plan provided and implemented..... N/A
- e) CSOs monitored and reported in accordance with permit..... N/A
- f) Portable pumps are used to relieve system..... N/A
- g) Lift station alarms provided and maintained ..... N/A
- h) Lift stations equipped with permanent standby power or equivalent ..... N/A
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N/A
- j) Any complaints received since last inspection of basement flooding ..... N/A
- k) Are any portions of the sewer system at or near capacity ..... N/A
- l) Are operations changed during high-flow events?..... N/A

Comments:

**SECTION I: SLUDGE MANAGEMENT**

- a) Sludge management plan (SMP) last audited by Ohio EPA:..... N/A  
Audit Date:
- b) Sludge adequately disposed ..... N/A  
Method:
- c) If sludge is incinerated, where is ash disposed of ..... N/A
- d) Is sludge disposal contracted ..... N/A  
Name:
- e) Has amount of sludge generated changed significantly ..... N/A
- f) Adequate sludge storage provided at plant ..... N/A
- g) Records kept in accordance with State and Federal law ..... N/A
- h) Any complaints received last year regarding sludge ..... N/A
- i) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments:

**SECTION J: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained ..... N/A\*  
Type of device: Device location:
- b) Calibration frequency adequate..... N/A  
Date of last calibration:
- c) Secondary instruments operated and maintained ..... N/E
- d) Flow measurements equipment adequate to handle full range of flows .... Y
- e) Actual flow discharged is measured ..... Y
- f) Flow measuring equipment inspection frequency \_\_\_\_\_ N/A
- g) Sampling location(s) are as specified by permit ..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) ..... N/E

Comments: Facility uses height of water in pipe to estimate the flow.

**SECTION K: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... N/E
- b) If alternate procedures are used, are they properly approved? ..... N/E
- c) Analysis performed more frequency ..... N  
     If yes, are results recorded in permittee's report? ..... N/A
- d) Commercial laboratory used: Yes  
     Name: Belmont Labs  
     Parameters analyzed:
- e) Quality assurance manual provided and maintained ..... N/E
- f) Calibration and maintenance of instruments is satisfactory? ..... N/E
- g) Results of last U.S. EPA quality assurance ..... N/A  
     Date:

Comments:

**SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001*	No							

Comments: No flow was observed from the ponds.

**SECTION M: MULTIMEDIA OBSERVATIONS**

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- b) Do you notice staining or discoloration of soils, pavement or floors ..... N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- e) Do you notice any unusual odors or strong chemical smells ..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: