



**Environmental
Protection Agency**

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

June 8, 2012

RE: AIR BP – CLEVELAND HOPKINS AIRPORT
PERMIT NO. 3IN00060
CUYAHOGA COUNTY

Mr. Steve Price
Facility Manager
Air BP – Cleveland Hopkins Airport
6200 Riverside Drive
Cleveland Ohio 44135

Dear Mr. Price:

On June 5, 2012, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. John Silvis, Fuel Farm Operator and you. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The treatment system consists of an 8,000-gallon oil/water separator, which discharges by gravity to a 26-foot deep 6-foot diameter well. Wastewater is then pumped to pond #1 which discharges from the bottom of the pond to pond #2 which also discharges from the bottom to a nearby storm sewer.
2. The discharge line from the oil/water separator to the outflow ponds is filled with water for a period of time then monitored for assurance that the line is not cracked, broken, or separated.
3. The oil/water separator is stick tested daily to assure no unreported spills have occurred.
4. The separator was last cleaned on October 11, 2011.
5. No maintenance activities are conducted in the maintenance shop. You indicated that Air BP has no intention of leasing out the maintenance shop area.
6. All vehicle oil changes are performed off site. The facility's vehicles are also washed off site.
7. The facility's Spill Prevention Control & Countermeasure plan was last amended on February 2012.
8. Sanitary waste is directed to a holding tank. Waid Corporation continues to be contracted to pump out the holding tank on an as needed basis.
9. The tie-in location has previously been determined. However, connection to the sanitary sewers has continually been delayed since Air BP has until recently been operating without a lease.
10. We discussed the facility's requirement to tie into the sanitary sewers. You provided a document from Parsons dated November 7, 2011, which discussed the sanitary sewer connection feasibility for the facility. The document concluded that based on the results of the study. The existing site constraints do not make the connection to the existing sanitary sewer system via gravity feasible. The study did not discuss a small diameter force main. Historically, Air BP could not commit to tie into the sanitary sewers since the facility was operating at the location without a lease. It is the Agency's understanding that Air BP has entered into a 15-year lease for

continued operation of the fuel farm. Based on the long term commitment that Air BP has entered into with the City, you must evaluate connection into the sanitary sewers via a small diameter force main.

11. The settling ponds were both visually clear and free of oil sheens. No discharge was occurring from the second pond.
12. All samples, which are collected, are iced down and shipped overnight by FedEx to Test America laboratories.
13. Eleven groundwater monitoring wells located around the perimeter of the underground storage tanks are monitored by a Veeder Route System. The system automatically monitors the groundwater monitoring wells 24 hours per day, 7 days per week. A pass or fail reading is reported daily.
14. Testing for pH is conducted on site with an ecosense pH meter.
15. The pH meter is calibrated with buffer solutions of 4.0 and 7.0 and 10.0.

This office has recently reviewed your self-monitoring reports covering the period October 1, 2010 through April 30, 2012 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Month	1	0	12/01/2010
001	00400	pH	1/Month	1	0	12/01/2010
001	01094	Zinc, Total Recoverable	1/Month	1	0	12/01/2010
001	34010	Toluene	1/Month	1	0	12/01/2010
001	34030	Benzene	1/Month	1	0	12/01/2010
001	34371	Ethylbenzene	1/Month	1	0	12/01/2010
001	34694	Phenol	1/Quarter	1	0	12/01/2010
001	81551	Xylene, Total	1/Month	1	0	12/01/2010
001	00310	Biochemical Oxygen Dem	1/Month	1	0	12/01/2010
001	00550	Oil and Grease, Total	1/Month	1	0	12/01/2010
001	34696	Naphthalene	1/Quarter	1	0	12/01/2010
001	00335	Chemical Oxygen Demand	1/Month	1	0	12/01/2010

Please notify this office, in writing, within 21 days receipt of this letter your intentions to tie into the sanitary sewers.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/cs