



**Environmental
Protection Agency**

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

September 13, 2012

RE: MELZER'S GENEVA BULK PLANT
OHIO EPA PERMIT 3IN00292
GENEVA TOWNSHIP, ASHTABULA CO.
COMPLIANCE INSPECTION EVALUATION

Mr. Andy Melzner
Melzerland of Geneva, LLC
dba Melzer's Fuel Service
755 East Erie Street
Painesville, OH 44077

Dear Mr. Melzer:

On September 12, 2012, a site inspection was conducted at the above referenced facility at 2868 Padanarum Road, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. You and Janet Powell represented Melzerland of Geneva, LLC (MG) and Melzer's Fuel Service, Inc. (MFS) during the inspection. The site is owned by MG and operated by MFS. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on October 5, 2011.

The system consists of drains to collect potential fuel spills from fuel loading pads, an 8,000-gallon oil/water separator, and skimmer via an under-drain system within the pad, and cavity water sump and product recovery tank. The site also has a separate storm sewer collection system consisting of parking lot drains and associated piping. The facility discharges to an unnamed tributary of Wheeler Creek east of the facility. No backup power is provided to the facility, and the facility is provided with audio and visual alarms. The facility is currently open on Mondays, Wednesdays, and Fridays.

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

1. No change was noted in the operation of the facility over the October 5, 2011 inspection.
2. The bulk plant receives petroleum product by large tanker trucks. The product is then off loaded and stored in one of five above ground storage tanks (four 17,000-gallon tanks and one 30,000-gallon tank).
3. Petroleum product is delivered to the facility via large tanker trucks and off-loaded into the tank farm at the loading/unloading rack area.
4. MFS loads smaller tanker trucks and delivers the product to their customers.
5. The loading/unloading rack area consists of a cement pad with a canopy top. The cement is graded so that any product spill or storm water that hits the pad will be routed to an 8,000-gallon oil/water separator and skimmer via an under drain system within the pad. All captured product is transferred to a product recovery

tank. Portable bowls are used directly under connections to minimize any leakage of spillage at the hose connection points.

6. The large above ground tanks have an earthen dike around them. The dike was found to be partially filled with clear storm water. All dike water is routed through the same 8,000-gallon oil/water separator and skimmer. Following the oil/water separator and skimmer, the dike water along with any water or released product from the loading/unloading rack pad is then routed to a storm water retention pond.
7. Smaller above-ground storage tanks, each about 500 gallons in capacity, are located to the east of the building and are dispensing units. The tanks have secondary containment with no piping.
8. Storm water from the scale area is pumped inside the dike area and routed through the oil/water separator and skimmer. Following treatment, the storm water is routed to the storm water retention pond. The oil/water separator was functional at the time of the inspection.
9. The evaporation pond is lined and has a cap on the discharge line, which must be opened in order for any discharge to occur. The cap was observed in place and no discharge was occurring at the time of the inspection. No sheen was observed in the pond.
10. Some spillage was noted in front of the skimmer device, and stains on the steel enclosure suggest that this may be related to maintenance and repair activities. Stained gravel and soils must be removed and disposed of offsite in an appropriate licensed disposal facility.
11. A log book of inspections, repairs and observations is maintained at the facility. The storm water treatment system is operated by MFS staff. MFS personnel perform routine operations at the wastewater treatment system, monitor the facility, and perform the pH sampling. Geauga County Department of Water Resources (GCDWR) submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application on behalf of MG/MFS. Quarterly and annual analytical work is sent to GCDWR since being acquired by MFS.
12. Documents inspected during the site visit include the facility include the spill prevention, control, and countermeasure plan (SPCC). A copy of the storm water pollution prevention plan (SWPPP) could not be located onsite, and a copy of the SWPPP was apparently not provided by BP to MFS when the NPDES permit was transferred. Andy Melzer was not able to obtain a copy of the SWPPP. Ohio EPA recommended that MFS contact DLB Oil and Gas of Williamsfield and obtain a copy of their SWPPP, also prepared by BP, and edit the plan to reflect the new ownership and the Geneva Facility. Ohio EPA could also not locate a copy of the annual certification that operations are in compliance with the plan, or documentation of annual training for key employees tasked with implementing the plan.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2011 through August 1, 2012 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit:

Limit, Reporting, and Compliance Schedule Violations

No violations of your effluent reporting limits, reporting frequency, or compliance schedule violations were noted for the time period reviewed.

Other NPDES Permit Violations - Storm Water Pollution Prevention Plan(s): A copy of your SWPPP was not available for inspection, and has apparently not been updated since transfer facility ownership from BP to MG. These documents should be reviewed at least annually or whenever there is a change in key personnel or ownership and revised accordingly as prescribed by Part IV of your NPDES permit. The SWPPP documents must also reflect specific contacts and telephone numbers, annual inspections, and annual certification of the plan. Please provide a schedule of when you expect to have the SWPPP document updated and provide this office with a copy of the revised SWPPP documents for review.

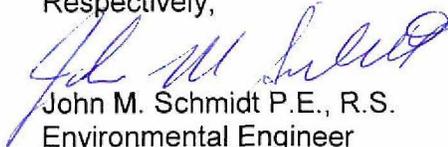
Comments

Ohio EPA offers the following:

1. **Updating of SWPPP** – Please note that the SWPPP document is a “living document” and that the document must be revised to reflect the new ownership and contact information when ownership officially transfers. Documentation of annual certification of the plan, an annual inspection of the facility, and documentation of annual training on the plan must be maintained with the plan as prescribed by your NPDES permit. A revision record should be maintained in the SWPPP to indicate that the date the plan was reviewed by MFS, even if no changes are warranted following the review.
2. **Status of NPDES Renewal** – On May 14, 2012, Ohio EPA received your NPDES renewal application. Following discussions with MFS, MFS desires to change its individual NPDES permit to a general permit. On August 31, 2012, MFS submitted a request to withdraw its existing permit and submitted a notice of intent (NOI) for coverage under the general permit for petroleum bulk oil storage facilities. The permit application remains pending with Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

File: Industrial/Melzer's Geneva Bulk Plant/pc