



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

December 6, 2012

Mr. Mark Pickering
Westway Terminal Cincinnati LLC
3500 Southside Avenue
Cincinnati, Ohio 45204

RE: WESTWAY TERMINAL CINCINNATI LLC, 1GR01159*EG, INSPECTION

Dear Mr. Pickering:

On November 27, 2012, I conducted a storm water inspection at Westway Terminal Cincinnati LLC facility. Shawn Wolfe, Sean Hope, and you represented the facility. The purpose of the inspection was to verify compliance with the facility's Multi-Sector General Industrial Storm Water Permit (MSGP).

The inspection started with a brief meeting with Mr. Wolfe, Mr. Hope and you. During this meeting, I completed the attached inspection form, and reviewed the Storm Water Pollution Prevention Plan (SWP3). A copy of the chemicals being stored on-site was provided from the SWP3. The plan itself has been updated to reflect the new storm water permit.

Westway completed its last storm water inspection in May 2012. These are done each May. A copy of the inspection is kept with the SWP3. The facility may continue to follow this inspection schedule under the new permit. This was a question raised during the meeting the day of the inspection. The quarterly visual assessments have also been included. The first of these inspections was conducted in September 2012. Since there are fourteen different storm water outfalls, the members of the Storm Water Team conduct the inspections. Subsector P1 does not require any benchmark monitoring. Each of the 14 outfalls was labeled, noting it was a storm water outfall.

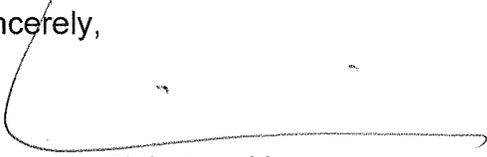
During the inspection, it did not rain. However, Westway had received rain the night before the inspection. As we were inspecting the outfalls, one of the team members was inspecting the storm water from the diked areas prior to releasing it. A log sheet is completed documenting the discharge. These log sheets are kept on-site. There was no evidence of any pollutants being discharged in the storm water.

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There are two 300-gallon fuel tanks for the plant vehicles. One tank contains diesel fuel and the other unleaded gasoline. The tanks are double walled to prevent leaks. There was no evidence of any staining around the fuel dispensers. However, there is no additional containment around the tanks. It is recommended that some type of curbing or containment be installed to prevent a catastrophic tank failure from reaching the storm drains on Southside Avenue.

The assistance provided was appreciated. Should you have any additional questions, please contact me at (937) 285-6108.

Sincerely,



Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

Enclosures

cc: Shawn Wolfe, Westway
Sean Hope, Westway

MP\bp



State of Ohio Environmental Protection Agency
Southwest District Office

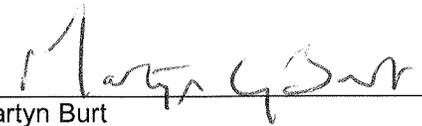
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OHR000005	1GR01159*EG	11/27/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Westway Terminal Cincinnati LLC 3500 Southside Avenue Cincinnati, Ohio 45204	11:30 am	3/10/2012
	Exit Time	Permit Expiration Date
	1:00 pm	12/31/2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Shawn Wolfe Mark Pickering Sean Hope	(513)921-8441	
Name, Address and Title of Responsible Official	Phone Number	
Mark Pickering, Terminal Manager Westway Terminal Cincinnati LLC 3500 Southside Avenue Cincinnati, Ohio 45204	(513)921-8441	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	N	Effluent/Receiving Waters	N	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)
See attached report.

Inspector	Reviewer
 Date: 12/6/12	 Date:
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Industrial Storm Water Compliance Evaluation Inspection

Name of facility: Westway Terminal Cincinnati, LLC

Address: 3500 Southside Avenue, Cincinnati, Ohio 45204

Permit number: 1GR01159*ED

Applicable permit sector: P1

Date of visit: 11/27/12

Time started: 11:30 am

Time ended: 1:00 pm

Facility representative(s): Shawn Wolfe, Mark Pickering, Sean Hope

OEPA inspector: Mari Piekutowski

SWP3

A. Did the facility representative produce an SWP3? Y / ~~N~~ / Not requested

A1. Did it include a site map? Y / ~~N~~

A2. Did it include schedules and procedures for the quarterly routine facility inspections? Y / ~~N~~

A3. Did it include schedules and procedures for the comprehensive annual facility inspection? Y / ~~N~~

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? Y / ~~N~~

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done?
Y / ~~N~~ / NA

Comments: The facility's SWP3 has been updated to reflect the new permit.

Inspection records

B. Were inspection records available? Y / ~~N~~ _____

Comments: The annual inspection is performed in May. The first quarterly inspection was conducted in September 2012. The quarterly inspections are done by the team since there are 14 outfalls that need to be inspected.

Site Observations

C. Are materials stored exposed to weather? ~~Y~~/N. If Yes, list materials.

See attached list from SWP3. The tank farms are diked.

D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens .

The piping and pumps have been improved. The pumps are on timers to prevent them from pumping the diked areas dry, and burning the motors. This also allows for smoother flows to prevent erosion. Each outfall is checked prior to being pumped out. Sheet s are maintained for each time a containment area is emptied.

E. No. outfalls from site/no. inspected 14/14

F. Did any show evidence of pollutants discharged in the storm water? ~~Y~~/N

If yes, describe:

G. Other observations/comments:

- **It was not raining at the time of the inspection, but it had rained the previous night. The dikes were in the process of being drained at the time of the inspection.**
- **None of the outfalls are substantially identical so each outfall is inspected and sampled.**
- **The only vehicles maintained on-site are the Gators. This work is done inside. All other vehicle maintenance is done off-site at Goodrich. There are two 300 gallon fuel tanks on-site for the plant vehicles. The tanks are double-walled, but there should be containment around the perimeter of this area to prevent any catastrophic failure from reaching Southside Avenue and the storm drains there.**

1. Developing, maintaining and revising the facility's SWPPP.
2. Implementing all SWPPP requirements.
3. Maintaining control measures.
4. Implementing corrective actions, as necessary.

Individual team member's responsibilities are as follows:

Employee	Title	Responsibility
Mark Pickering	Terminal Manager	Implement program and ensure overall compliance with SWPPP requirements; coordinate employee training and maintain training records.
All Team Members		Inspect area for debris, maintain equipment, practice good housekeeping, monitor driver activities to minimize spillage and respond to spills.

3.0 SUMMARY OF POTENTIAL POLLUTANT SOURCES

3.1 Activities in the area:

The following list includes, but is not limited to, activities that could affect storm water at the site:

- Material & Waste Storage
- Material Transfer
- Vehicle Refueling
- Terminal Maintenance
- Terminal Housekeeping

3.2 Potential Pollutants:

The following list summarizes materials stored at the site during the previous three years:

TABLE 3-1 ABOVE GROUND STORAGE TANK SUMMARY:

PRODUCT	Storage Locations	STORAGE START	STORAGE END
UAN Solution	7213, 7214, 7215, 7216, 7217, 7218, 7219, 7221, 7232, 7235	10/16/2009	Current
Refined Glycerin	7201, 7233, 7234, 7230	10/16/2009	Current
Sodium Hydroxide Solution	7204, 7205, 7206, 7208, 7226, 7242, 7243	10/16/2009	Current
Crude Glycerin	7211, 7224, 7225, 7227, 7244	10/16/2009	Current
Soy Solubles	7202	06/01/2010	Current
Agnique	7203	10/16/2009	Current
Heavy Corn Steep Water	7209	06/08/2011	Current
Neodol- 67	7210, 7220	01/01/2011	Current
Potassium hydroxide	7212	10/16/2009	Current
150N Base Oil (Catalytic De-Waxed Heavy Paraffinic Oil)	7222	06/15/2012	Current
Propylene Glycol	7229, 7239, 7222	10/16/2009	Current
High pH Water	7231, 7236	02/12/2011	Current
Calcium Nitrate - 9%	7237	10/16/2009	Current
Monoethanolamine (MEA)	7238	10/16/2009	Current
Hexamoll	7239	7/1/2012	Current

PE-20	7240	10/16/2009	Current
T-gold (Additive)	7241	10/16/2009	Current
Antiblaze	7299	10/16/2009	Current
Branched Alkyl Benzene	72112	10/16/2009	Current
Phosphoric Acid	Trans-loading Rail	10/16/2009	Current
Brightener	Trans-loading Warehouse	10/16/2009	Current
Permanganate	Warehouse / Trans-loading	10/16/2009	Current
Rheosolve	7228	12/02/2010	12/01/2011
Ethylene Glycol	7231	10/16/2009	05/31/2010
Diethylene Glycol	7236	10/16/2009	05/31/2012
Magnesium Hydroxide	7209	10/16/2009	11/30/2010
Sulfuric Acid	Trans-loading Rail	10/16/2009	12/31/2010
Refined Soybean Oil	Trans-loading Rail	10/16/2009	05/31/2010
Ultra-low Aromatic Mineral Oil	7274, 7275	10/16/2009	05/16/2011
Polyethylene Glycol 600	Trans-loading Warehouse	10/16/2009	06/12/2012
Hexane	Trans-loading BO-2	10/16/2009	03/31/2012
Gluconate	Warehouse / Trans-loading	10/16/2009	08/03/2011
Amines	7228	10/16/2009	05/31/2010
Variety of products related to terminal maintenance and housekeeping activities	Garage, Shop, Dry Storage	10/16/2009	Current

3.3 Spills & Leaks

Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under CWA 311 (40 CFR 110.6 and 40 CFR 117.21) or section 102 of CERCLA. Significant spills may also include releases of oil or hazardous substances that are not in excess of reporting requirements.

The following spills/leaks were reported to the necessary agencies:

- 9/3/2010 – elevated pH water enters storm drain by Area B, emergency responders blocked line to river, flushed line with water, and disposed of wash water
- 1/3/2010 – elevated pH water enters storm drain by Area B, emergency responders blocked line to river, flushed line with water, and disposed of wash water
- 2/12/2011 – 28,000 gallons of sodium hydroxide spill in Area D due to hose failure on a heat exchanger heating tank 7242, emergency responders reclaimed the spill and placed in a storage tank

3.4 Non-storm water discharges:

In accordance with the site's NPDES storm water permit the following non-storm water discharges are allowable:

- Discharges from fire-fighting activities (not planned exercises);
- Fire hydrant flushings;
- Potable water, including water line flushings;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gasses or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);
- Routine external building washdown that does not use detergents;