



*40 years and moving forward*

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

December 10, 2012

Scott Perry  
HS&E Program Manager  
NiSource NGD  
300 Friberg Parkway  
Westborough, MA 01581

**Re: Columbia Gas of Ohio - Bangs Fabrication Shop  
NPDES Permit 4IM00100/ OH0053538  
Reconnaissance Inspection  
Knox County**

Dear Mr. Perry:

On November 29, 2012, a Reconnaissance Inspection was conducted at the Columbia Gas of Ohio - Bangs Fabrication Shop. Present for the inspection were yourself, Mark Pinyerd and Joe Kuch representing NiSource 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.

Please refer to the Summary of Findings and Comments section of this report for additional details regarding the compliance inspection. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 644-3848 or e-mail at [mike.sapp@epa.state.oh.us](mailto:mike.sapp@epa.state.oh.us).

Sincerely,

Michael Sapp  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

cc: Michael Sapp

MS/nsm Columbia Gas Gangs Center 12

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IM00100	GH0053538	Ri	S	
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
11/29/2012	10:00 AM	10:40 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Columbia Gas of Ohio - Bangs Fabrication Shop 8284 Columbus Road Bangs, Ohio 43050	8/1/2012
	Permit Expiration Date
	7/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Scott Perry - HS&E Program Manager Joe Kuch Mark Pinyerd - Facility Manager	(508)836-7248
Name and Title of Responsible Official	Phone Number
Scott Perry, HS&E Manager	(508) 836-7248

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
M	Receiving Waters	Several recent TSS and oil & grease violations
S	Laboratory	

Comments:

Signatures	
 12/6/12	 12/6/12
Michael Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

**ADDITIONAL INFORMATION**  
**Columbia Gas – Bangs Operating Center**  
**4IM00100\*FD - OH0053538**

**General**

The Columbia Gas – Bangs Operating Center stores, manufacturers, repairs and supplies various equipment used in the transmission and storage of natural gas. The 17-acre site consists of a warehouse, machine shop, welding shop, vehicle maintenance area, and outdoor storage yard. Hydrostatic test waters are generated through testing of pipe sections and other vessels. Hydrostatic test waters are first directed to a 1500 gallon precast concrete tank equipped with float-controlled transfer pumps set at 20 gpm. Submersible pumps (one float controlled and one hand operated) convey accumulated hydrostatic test waters from the collection tank through a 25 micron pre-filter, a 5 micron cartridge filter for solids removal followed by a vertically oriented oil coalescer. Following treatment, the water is discharged into the facility drain system to Dry Creek through a storm sewer on the Columbia Gas property. Effluent loading limits are based on a flow of 400 gpd. Sanitary wastewater generated at the facility is treated through a Wisconsin mound system which was installed in 2006. The mound system was designed to serve approximately 25 employees.

NiSource recently broke ground on a new facility adjacent to the existing building. The new facility is expected to be operational on or before June 30, 2013. The new facility will provide a recycle system for hydrostatic test waters. The recycle system will provide flow equalization, storage, cartridge filtration and liquid phase carbon treatment. A Permit to Install will not be required for the recycle system since the Ohio Administrative Code section 3745-42-02 (B)(7)(a) provides an exemption for recycle system inside buildings used for hydrostatic test water. Any alterations or modifications to the disposal system for sanitary wastewater must be reviewed and approved by the Knox County Health Department.

At the time of the inspection, the following general observations were made with operational practices at the facility:

1. Effluent flows are measured based on readings taken from a magmeter and flow totalizer on the effluent side of the treatment system.
2. Two groundwater wells are used to supply potable water and water for hydrostatic testing. Once the pipes and welds are tested, the hydrostatic test water is discharged onto the shop floor and enters a floor drain where it is conveyed to the 1500 gallon flow equalization tank for treatment.
3. The attached table contains a list of NPDES permit violations since the last inspection was conducted in March 2011. The suspended solids violations were attributed to solids on the shop floor entering the system when the pipes were drained. The floor drains are now covered when not in use and the shop floors are being swept prior to the release of the hydrostatic test water. The particulate

filters are now being changed out on a monthly basis. The recent oil & grease violations might have been attributable to pilot testing that was being performed on a different type of steel pipe that had an oil coating. In response to the violation, the facility changed out the oleophilic cartridge filters.

4. The facility recently installed the outfall signage along Dry Run Creek as required in Part II.B. of the effective NPDES permit.
5. MASI Labs collects and analyzes effluent samples for pH, COD, suspended solids and oil & grease.
6. It will be necessary to submit a letter to this office requesting formal termination of your NPDES permit once the new recycle system is operational and the discharges of hydrostatic test waters are eliminated.

## Compliance Data for Columbia Gas of Ohio - Bangs Fabrication Shop between 3/1/2011 to 10/31/2012

### Summary

Permit Effluent Limit Violations: 4

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
September 2011	001	Total Suspended Solids	30D Conc	12	16.	9/1/2011
March 2012	001	Total Suspended Solids	30D Conc	12	43.	3/1/2012
March 2012	001	Total Suspended Solids	1D Conc	18	43.	3/19/2012
October 2012	001	Oil and Grease, Hexane	1D Conc	10	15.9	10/9/2012