



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

January 29, 2013

Mr. Dan Schaffeld  
Owner, Riverside Auto  
561 W. Central Avenue  
West Carrollton, OH 45449

**RE: Site Inspection, Industrial Stormwater Discharge Permit #1GR00118\*DG**

Dear Mr. Schaffeld:

On Thursday, January 17, 2013, I inspected Riverside Auto to determine compliance with industrial storm water permit requirements. The inspection was prompted by an anonymous complaint called into OEPAs Southwest District office alleging that waste auto fluids and other materials were being improperly managed at the site. You represented the company during this review.

While the complainant's allegations were largely unfounded, a few compliance issues became apparent during this inspection:

1. Waste vehicle fluids were observed to be stored in open totes near the back of the property. One of the totes was inadequately covered by an old windshield such that rainfall could easily enter the container. A heavy rain could potentially add enough water to overflow the contents of the tote. Excess water in these containers also adds to the cost your business incurs when it pays to have the totes pumped.
2. If these totes contain used oil, they must be labeled with the words "used oil". If the mixture of oils and gasoline and other spent vehicle fluids has a flash point temperature of under 140 degrees Fahrenheit, the liquid would be regulated as hazardous waste, and the containers must be labeled accordingly, even as the material is destined for use as fuel for industrial boilers or furnaces.
3. The site has an outdated stormwater pollution prevention plan (SWP3). You indicated that the existing plan was prepared for the site by its previous owner. The possible site operations have not changed significantly since you purchased the business, but the SWP3 still needs to be updated to reflect the change in ownership, as well as changes in runoff monitoring requirements imposed by the current industrial stormwater permit, issued in January of 2012.

Required content for SWP3s is found on pages 23 and 24 of the permit. Monitoring requirements that Riverside Auto will have to address are as follows:

**1. Quarterly Visual Assessment of Storm Water Discharges (pp19- 20)**

All companies covered under this "multi-sector" general industrial permit are required to assess samples of stormwater runoff collected from their property on a quarterly basis. Samples are to be collected at points where runoff leaves the property. Details of what to look for in collected samples can be found on page 19 of the permit. Information obtained from these assessments must be documented and kept at the site, and must be made available to Ohio EPA upon request.

**2. Benchmark Monitoring of Storm Water Runoff (pp 29-30)**

Industrial sites are required to perform "benchmark" monitoring of storm water runoff that is discharged from their property. The types of pollutants to be monitored will depend on the industrial sector in question. Information about benchmark monitoring begins on page 30 of the permit, and details about the pollutants that Sector M (auto salvaging) facilities are required to look for (total suspended solids, total aluminum, and total lead) are found on pages 66-67.

Benchmark monitoring requirements call for four samples to be obtained during the first three years in which the permit is in place, beginning January 1, 2012. Sampling can be done at any time within this three year period, so long as each of the four seasons is represented. Once all sampling has been completed, the results are to be averaged and then compared to the benchmark concentrations established by U.S. EPA for particular pollutants. If results are higher than U.S. EPA's levels, then regulated companies must find ways to reduce the amount of pollutants that are carried from their sites in stormwater runoff.

Please provide a copy of the site's revised SWP3 within 60 days of receipt of this letter. The plan may be submitted electronically if that is more convenient.

If you have questions about anything in this letter, I can be reached at (937) 285-6442 or via email at [chris.cotton@epa.state.oh.us](mailto:chris.cotton@epa.state.oh.us).

Sincerely,



Chris Cotton  
Environmental Specialist II  
Division of Surface Water

CC/kb