

to go and move forward

Edith B. Fischer, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED #91 7108 2133 3932 1838 6985

Thomas A. Kurtz
2850 Rohr Road
Groveport, Ohio 43125

Re: Industrial Storm Water Inspection at Alexandria Facility

Dear Mr. Kurtz:

This letter is written in follow-up to an industrial storm water inspection I conducted at your operations located in Alexandria, Ohio (N40.08808, W82.62041) on January 15, 2012. Paul Vandermeer with Ohio EPA, DSW and Jerry Bennett with Kurtz Brothers were present during this inspection. The purpose of the inspection was to evaluate operations, assess permitting requirements, and evaluate storm water management controls. The following items were noted:

Permitting Requirements:

- The current site coverage is covered under a Construction Storm Water Permit. Please understand this permit authorizes the discharge of storm water only associated with construction activities. I understand you are pursuing an Individual NPDES Permit for the discharges associated with mining operations, gravel wash water, and the potential run-off associated with the composting operations. During the inspection we evaluated the various proposed discharge points which will be inclusive in your application. Please submit your application within 14 days from receipt of this letter.

401/404 Permitting Requirements:

- During the inspection you presented a copy of a site evaluation conducted by Natural Resource Conservation Service (NRCS) dated 1987 and an authorization granted by the Army Corps of Engineers regarding the stream crossings and wetland identification. I requested you send me an electronic copy and I will forward the information to our Water Quality Section for further evaluation.

Storm Water Management Controls:

- The blending pad and final product associated with your composting operations is controlled by a sediment impoundment with a proposed discharge. This impoundment may require cleaning as it appears the accumulation of sediment has exceeded 50 percent of the original design capacity. (SEE FIGURE ONE).

- The large stock piles of compost are contained via berms which direct the run-off to an impoundment directly adjacent to the site trailer (SEE FIGURE TWO). Additional containment measures are addressed in low lying contained areas directly west of the large piles. This area must be continually monitored via your mandated self-inspections for the threat of a storm water release. I strongly recommend an additional impoundment in this area to recirculate water back onto the large compost piles (SEE FIGURE THREE).
- The mining operations directly adjacent to the entrance are currently contained. I understand you are pursuing a discharge from this portion of the mining operation which is proposed in your forth coming application.
- Corrective measures were addressed to eliminate the illicit discharge noted concurrent with my last inspection on November 29, 2012. Additional measures are expected, as Mr. Bennett indicated during our meeting, to provide containment. Mr. Bennett proposed a new pond in this area to provide additional containment and treatment for a proposed discharge.
- Please submit to my attention a revised drainage plan addressing the proposed discharges, containment areas, and treatment measures for this site.

If you have any questions regarding this letter or the inspection, please do not hesitate to call me at our Central District Office at (614) 728-3844. In addition, please provide a written response to this letter within seven days for receipt.

Sincerely,



Harry Kallipolitis
Storm Water Coordinator
Division of Surface Water
Central District Office

Enclosure

c: Phil Farnlacher, Paul Vandermeer, Suzanne Matz
Jason C. Kurtz
Jerry Bennett, Kurtz Brothers Central Ohio LLC

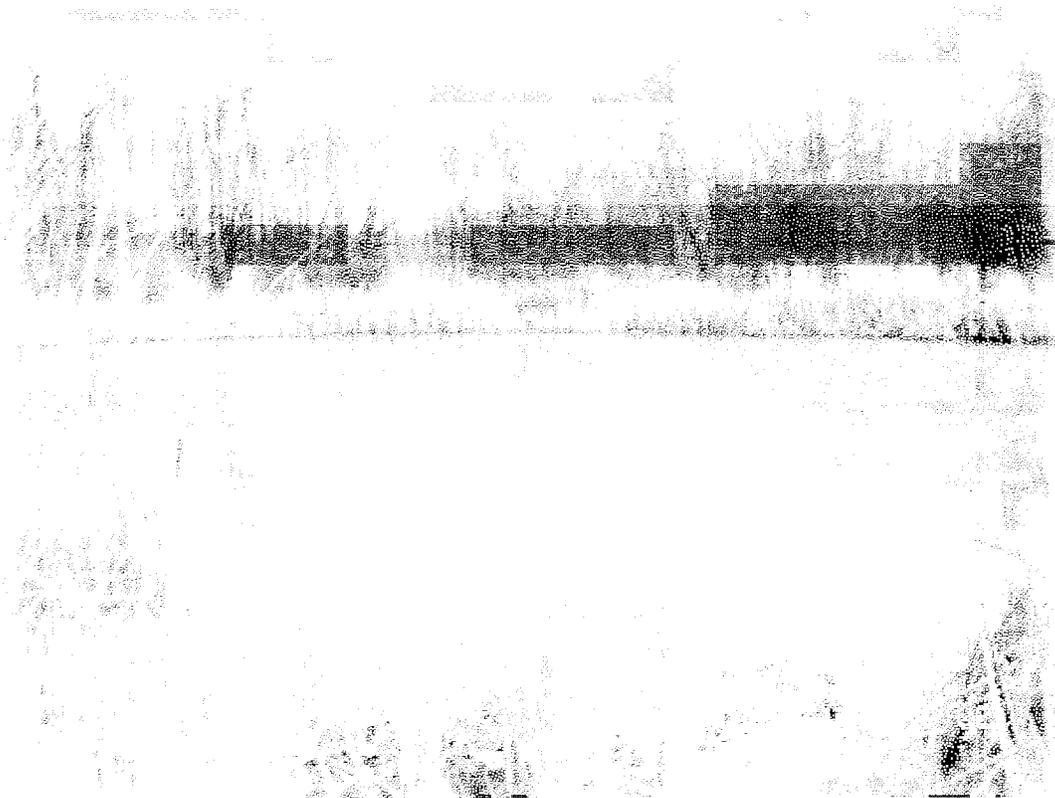


Figure 1: Treatment pond associated with Blending Pad. The pond appears more than 50% full and should be cleaned.

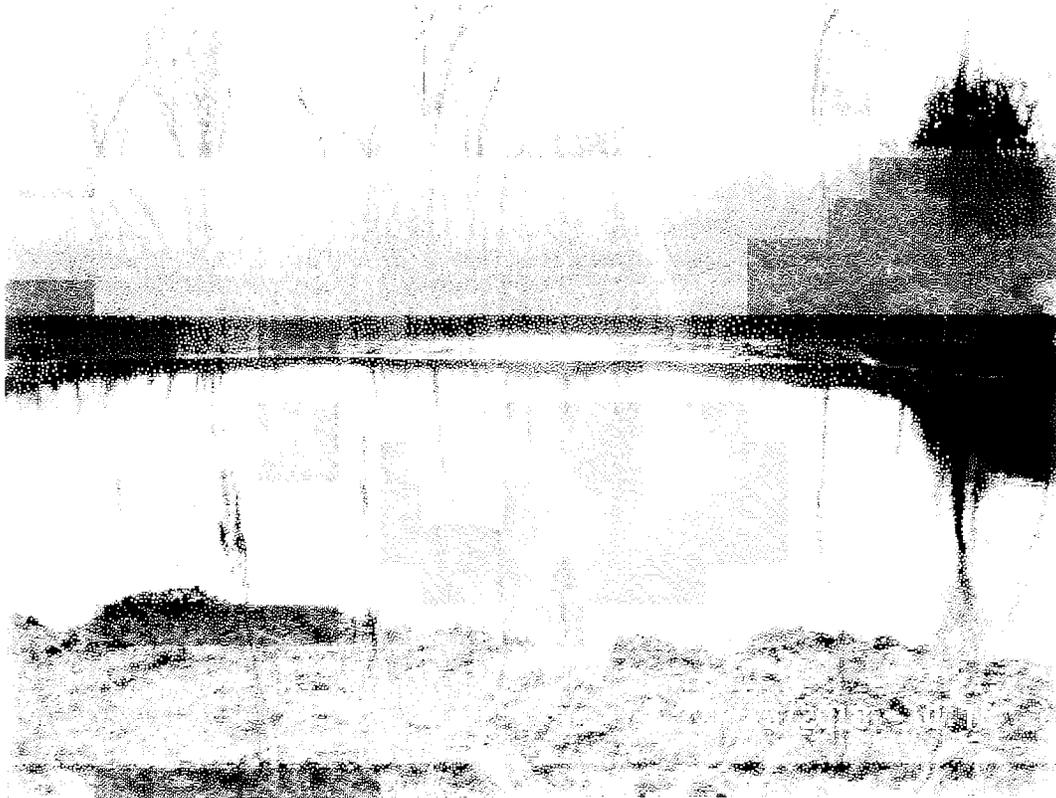


Figure 2: Pond intended for collection of storm water run-off associated with compost piles. Please note there is no discharge authorized from this impoundment.



Figure 3: Low lying areas for containment of run-off from large compost piles. Recommend a containment pond in this area for purposes of re-use.