

John E. Kasich, Governor  
Alan Kruger, Jr., Governor  
Gabe Leland, Governor

February 5, 2013

Paul Kennedy, Env., Health, Safety Supervisor  
Port Columbus International Airport  
4800 International Gateway  
Columbus, OH 43219

**Re: Port Columbus International Airport  
NPDES Permit 41100007/ OH0124311  
Reconnaissance Inspection  
Franklin County**

Dear Mr. Kennedy:

On January 23, 2013, a Reconnaissance Inspection was conducted at the Port Columbus International Airport. Present for the inspection were you, representing the Columbus Regional Airport Authority, Liz Fisher representing GSP – the consultant which coordinates sampling events, and Mike Sapp 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.

**Findings:**

1. Attached are compliance tables between January 2010 and January 2013. The facility has largely been compliant with the permit effluent limits. However, it was noted that Outfall 002 is inaccessible due to construction related to runway improvements. As it has been determined that Outfall 002 is indicative of the water quality coming from Outfalls 001, 003, 004, and 007, a suitable alternate sampling site would be Outfall 001. **Please begin sampling at an alternate outfall in February until Outfall 002 is accessible.**
2. The outfall markers have been installed but the marker for Outfall 008 was on the ground due to damage. **Please re-install the marker by April 1, 2013.**
3. The de-icing fluid is managed by an automated analyzing system. Spent propylene glycol solution and runoff is collected and tested for total organic carbon (TOC). The operations rely on a correlation between TOC and BOD, which as of March 2008 was:

$$BOD_{5\_day} \left[ \frac{mg}{L} \right] = e^{0.91 * \ln(TOC) + 1.4}$$

If the BOD concentration nears the NPDES permit limit, the facility pumps the contaminated runoff to two 5-million gallon equalizing tanks which are discharged to sanitary sewers. Otherwise, the facility discharges the runoff to Outfall 006.

4. Regarding the TOC analyzer, the permit-to-install included a special condition which required a standard operating procedure be submitted. You indicated that this was likely already submitted but would be outdated. **Please provide the most recent edition of the plan by April 1, 2013.**
5. Thank you for providing me the most recent revision of the SWPPP after the inspection.

Attached is the inspection report. **Deliverables are requested by April 1, 2013.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.state.oh.us](mailto:cole.miller@epa.state.oh.us).

Sincerely,



Cole Miller  
Environmental Specialist II  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

ec: Cole Miller

**NPDES Compliance Inspection Report**

**SECTION A: NATIONAL DATA SYSTEM CODING**

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
41100007	OH0124311	RI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
1/23/2013	10:00 AM	11:30 AM	No	No

**SECTION B: FACILITY DATA**

Name and Location of Facility Inspected	Permit Effective Date
Port Columbus International Airport	5/12/2011
	Permit Expiration Date
	4/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Liz Fisher Paul Kennedy	
Name and Title of Responsible Official	Phone Number
Paul Kennedy, Env., Health, Safety Supervisor.	(614) 239-3347

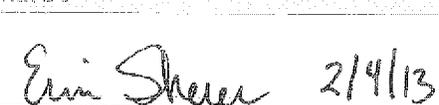
**SECTION C: AREAS EVALUATED DURING INSPECTION**

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S*	NPDES Compliance	Sampling of alternate outfall should be done in lieu of Outfall 002 during construction.
S*	Operations & Maintenance	Please provide SOP for TOC analyzer.
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
S	Receiving Waters	
N	Laboratory	

Comments:

Signatures

 2/1/13	 2/4/13
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

## Compliance Data for Port Columbus International Airport between 1/1/2010 to 1/1/2013

### Summary

Permit Effluent Limit Violations: 4

Permit Effluent Code Violations: \*Most code violations were due to inaccessible outfalls in early 2010 and 2011.

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Effluent Violations						
Report Period	Station	Parameter	Limit	Actual	Rel. Conc	Violation Date
August 2010	006	Dissolved Oxygen	1D Conc	5.0	4.75	8/4/2010
September 2010	006	Dissolved Oxygen	1D Conc	5.0	4.21	9/16/2010
May 2011	601	pH	1D Conc	9.0	9.85	5/2/2011
August 2011	601	pH	1D Conc	6.5	6.1	8/3/2011