



**Environmental  
Protection Agency**

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

February 25, 2013

RE: COLUMBIANA COUNTY  
FAIRFIELD TOWNSHIP  
BUCKEYE TRANSFER REALTY, LLC  
41738 EASTERLY DRIVE  
NPDES PERMIT NO. 3IE00035

**NOTICE OF VIOLATION**

Jerry L. Stoneburner, President  
Buckeye Transfer Realty, LLC  
41738 Esterly Dr.  
Columbiana, OH 44408

Dear Mr. Stoneburner:

On December 5, 2012, this writer conducted an inspection of Buckeye Transfer Realty, LLC, located at 41738 Esterly Dr, Columbiana, Ohio. This facility is the site of the former National Refractories site that is now leased to several different tenants. The purpose of the inspection was to review the water pollution control facilities and evaluate compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit. We also discussed upcoming changes to the draft NPDES Permit. The following was observed at the time of the inspection:

- 1) There are three outfalls outlined in your NPDES permit. Outfall 001 is the discharge of stormwater from the western side of the property and treated sanitary effluent from Internal Station 601. This effluent is discharged through an oil and grease separator with continuous loop skimmer and V-notch weir. Outfall 002 is the discharge of stormwater from the eastern side of the property. The stormwater is from truck traffic, parking lot areas and the old National Refractories chrome ore piles. The Internal Station 601 is from the wastewater treatment plant serving the back half of the facility.
- 2) At the time of the inspection, the oil and grease separator was being repaired and would be back on line shortly as soon as electrical service was repaired. Flow records must be maintained at this location and hauling records for when the separator is cleaned.
- 3) The stormwater treatment plant appeared to operating satisfactorily. The aeration tank had a good color and the effluent appeared satisfactory. The surface sand filters were in need of some minor cleaning. Sand and weeds removed from the unit during cleaning must be placed in dumpster for disposal at a municipal landfill. When replacement sand is needed, the appropriate material must be installed and meet the following specifications. Sand shall be cleaned and washed with an effective size between 0.4 and 1.0 mm, with a uniformity coefficient not greater than 3.0. There must be at least 18 inches of filter sand over the gravel underdrains. A sieve analysis should be provided by your supplier.
- 4) The facilities electronic Discharge Monitoring Reports were reviewed from January 2010 through December 2012. From January 2010 through January 2012, no reports were submitted to this office. This is a violation of your NPDES permit for failure to report. Since February 2012, you started reporting again and there have been seven violations. However,

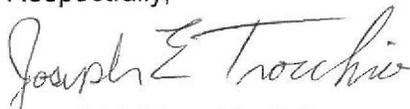
there have not been any since last November. Most of the violations are fecal coliform or chlorine residual from Internal Station 601. Staff should make sure the proper chemicals are installed during the summer and that adequate contact is occurring. There was one pH violation at Station 001.

- 5) It was noted that for nine months, of the period in which you did submit data, there was no recorded precipitation at Outfall 002. This is an extremely unlikely scenario since the precipitation is recorded daily. This station is at the drainage way where it leaves the property. This reporting issue must be addressed.
- 6) The current NPDES permit has expired in December 2010. The renewal application was not submitted on time due to an industrial accident with the site manager. The renewal application was received in this office on December 31, 2012. The new draft permit will be available for your review shortly.
- 7) There is also an unknown on-site treatment system, at the front of the property, that serves the front part of the building. This system must be evaluated to determine if there is any failure. On-site facilities are only for sanitary wastewater only. Any industrial waste placed in this system would be a violation of the Ohio Revised Code 6111 and the Clean Water Act. Should this system fail, it must be abandoned and the system must connect to the wastewater treatment plant at the rear of the property. This should be done as soon as practical to prevent any long-term environmental concerns.
- 8) There are various tenants on the property with various operations. The stormwater on this site for the general areas operated by your facility will be regulated under your new NPDES Permit. A Stormwater Pollution Prevention Plan must be developed for all the common areas that your facility supervises. Each individual tenant under lease by you must apply for a Industrial Multi-Sector Industrial General Permit for the drainage basin they are responsible for. A site wide map must be submitted to this office outlining the drainage areas for your common area and each individual tenant.
- 9) The agency will forward a copy of your new draft permit in the near future.

Please submit your response, in writing, to the above comments by March 18, 2013.

Should you have any comments or concerns regarding this letter, please feel free to contact me at (330) 963-1193.

Respectfully,



Joseph E. Trocchio, P.E.  
Environmental Engineer  
Division of Surface Water

JT

cc: Lisa Wallace, General Counsel, Buckeye Transfer Realty  
Jethro Klink, Facility Maintenance, Buckeye Transfer Realty  
Lori Barnes, R.S., Environmental Director, Columbiana County Health Department.

File: Industrial/Permit Compliance/Buckeye Transfer, LLC