



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

May 20, 2013

RE: PRIORITY AIR CHARTER
NPDES PERMIT NO. 3IN00349
EAST UNION TOWNSHIP, WAYNE COUNTY
COMPLIANCE EVALUATION INSPECTION

NOTICE OF VIOLATION

Mr. Brian Stoltzfus, President
Priority Air Charter, LLC
Preferred Airparts, LLC
11234 Hackett Road
P.O. Box 12
Kidron, OH 44636

CERTIFIED MAIL

Dear Mr. Stoltzfus:

On March 13, 2013, a site inspection was conducted at the above referenced facility at 11234 Hackett Road, East Union Township, Wayne County. The inspection was conducted by John Schmidt, Jon Jamison, and Veronica Newsome of this office, with you representing Priority Air Charter, LLC and Preferred Airparts, LLC. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and in conjunction with the renewal of said permit. The last compliance inspection was conducted on January 9, 2007.

Priority Air Charter, LLC operates an on-demand air charter business, flying parts and people as needed. Another company, Preferred Airparts, LLC, also operates at this location, repairing and servicing aircraft. Office space is leased to Interlink Ministries and Go Forth Ministries, which have three to four employees. Building floor drains and piping from parts washers are directed to dedicated industrial waste holding tanks, outfitted with high-level alarms. Units include a North Hangar Holding Tank (1,000 gallons) and engine parts degreaser holding tank (1,500 gallons) and 30-gph evaporator, all installed in 2007 under Permit-To-Install (PTI) No. 02-612569; and a West Hangar Holding Tank (2,000 gallons), installed in 2008 under PTI No. 02-651313. The holding tanks collect floor drains and trench drains in the north and west hangars that contain solvent wash water. A wash water recycle system was installed under PTI 02-779278 in 2010. There are no discharges to waters of the state from these systems. Storm water from fueling areas is collected and treated through a 4,000-gallon oil-water separator (OWS) prior to discharge to Little Sugar Creek, which is regulated under NPDES Permit No. 3IN00349. There is an onsite system to treat domestic wastewater from both Priority Air Charter, LLC and Preferred Airparts, LLC.

The domestic sewage treatment system consists of a trash trap, two 1,000-gallon septic tanks in series, dosing chamber, subsurface sand filter, and an evapotranspiration field. The system was installed under a design approved by the Wayne County Health Department. The system discharges into the ground and is not regulated by the NPDES permit. There is a curtain drain around the south side of the field that discharges to the effluent from the OWS prior to discharge to Little Sugar Creek.

Runoff from a manure composting pit flows through a wide vegetative strip for treatment prior to discharge to surface water drainage swales.

Observations and Notations

1. Changes noted in the operation of the facility over the January 9, 2007 inspection include replacement of the existing onsite domestic sewage treatment system with a new system approved by the Wayne County Health Department, the addition of industrial holding tanks to divert industrial wastewaters from the onsite treatment system, and a wash water recycling system.
2. The facility receives aviation fuels by large tanker trucks. The product is then off loaded and stored in one of three above ground storage tanks (ASTs): a 12,000-gallon AV fuel AST, a 12,000-gallon Jet A fuel AST, a 2,000-gallon gasoline AST.
3. Petroleum product is delivered to the facility via large tanker trucks and off-loaded into the tank farm at the loading/unloading area at the west end of the tank farm. The unloading area drains to a catch basin that flows to the OWS.
4. Two fuel dispensers (one AV fuel and one Jet A fuel) are located west of the AST tank farm in the aircraft fueling area. The aircraft fueling area drains to a catch basin that flows to the OWS.
5. Sanitary wastes are discharged to an onsite septic tank and evapotranspiration (ET) field. There were no signs of failure of the ET field.
6. The aviation fueling area consists of a cement pad. The cement is graded so that any product spill or storm water that hits the pad will be routed to an 4,000-gallon OWS and skimmer via an under drain system within the pad.
7. Plumbing from the parts washing area have been disconnected from the sanitary treatment system, and is now collected for off-site disposal. Safety Kleen hauls the contents of the OWS and media from sand blasting operations for off-site treatment and disposal.
8. The above ground tanks have a concrete dike around it. All dike water is routed through the same 4,000-gallon OWS and skimmer. The separator-skimmer was functioning at the time of the inspection. Following the OWS and skimmer, the water is routed to a Little Sugar Creek.
9. Storm water from the runway and taxi-ways flow overland to yard drains that drain to a send discharge to Little Sugar Creek. This additional discharge will be labeled Outfall 002 in the NPDES renewal.
10. A log book of inspections, repairs and observations is maintained at the facility. The storm water treatment system is operated by Masi Environmental Services (Masi) on behalf of Preferred Air Charter (PAC). Richard Jackson of PAC and collects samples for analysis by Masi. Masi also monitora the facility and performs pH and Oil and Grease sampling. Electronic discharge monitoring reports (eDMRs) are submitted by Masi and PAC through Ohio EPA's Web-based application. Prior to February 2012, Andy Getz of Preferred Air Charter submitted the eDMRs for PAC, with Jeff Ullom assuming these duties in February 2012.

11. Documents inspected during the site visit include the facility storm water pollution prevention plan (SWPPP) and spill prevention, control, and countermeasure plan (SPCC), and the documents appear to have been last updated on August 24, 2005. The latest annual site certification inspection was conducted on September 19, 2005. Employee training on the SWPPP was conducted on July 25, 2012 and January 29, 2013.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period January 1, 2008 through April 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

Limit Violations

No limit violations are noted for the compliance period reviewed.

Reporting Violations

The following reporting frequency violations are noted:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00552	Oil and Grease, Hexane	1/Quarter	1	0	03/01/2008
001	00552	Oil and Grease, Hexane	1/Quarter	1	0	06/01/2008
001	01300	Oil and Grease Severity	1/Week	1	0	01/01/2012
001	01300	Oil and Grease Severity	1/Week	1	0	01/08/2012
001	01300	Oil and Grease Severity	1/Week	1	0	01/15/2012
001	01300	Oil and Grease Severity	1/Week	1	0	02/01/2012
001	01300	Oil and Grease Severity	1/Week	1	0	02/08/2012
001	01300	Oil and Grease Severity	1/Week	1	0	02/15/2012

Part III, Item 12 of your NPDES permit requires that a written explanation as to why these events occurred must be provided, along with measures to ensure that it is not repeated. For future reference, noncompliance notifications must be made within 24 hours of discovery. Noncompliance notification forms may be found at www.epa.ohio.gov/portals/35/permits/24-hour_reporting_Form4498_bypasses.doc. I shared a copy of the noncompliance notification requirements with you during the inspection.

NPDES Permit Renewal

Please note that your current NPDES permit expired on December 31, 2012. The renewal application was received by Ohio EPA on March 16, 2012, within the prescribed timeframe specified by Part III of your NPDES permit. You will continue to follow your existing permit until your new NPDES permit becomes effective.

The following are noted in the review of the renewal application:

1. Form A:
 - a. Item II F: As storm water is also discharged associated with industrial activity, the section must be marked "yes" and form 2F completed.
 - b. Item VI C: The physical location of the facility is not the Village of Kidron, but is instead East Union Township, according to the Wayne County Highway Map. Please revise the section accordingly.
2. Form 2C:
 - a. Section I: From examination of Sheet C1-A of PTI application No. 02-521323, there is a second outfall identified as a 12-inch corrugated pipe that conveys Catch Basin

2 to Little Sugar Creek. This Outfall should be identified as Outfall 002 and the latitude and longitude listed.

- b. Section IIA: The line drawings provided is incomplete, and does not show the separate line that serves Catch Basin No, 2 and the North Hangar OWS. For the line drawing provided, the line coming from the curtain drain from the sanitary ET field is not shown. Catch basins should be numbered in the line drawing.
- c. Section V: Oil and Grease is analyzed for as a part of your NPDES permit and should be listed here.
- d. Section VIII: It is unclear why an analysis of the storm water was not monitored for the parameters identified in Section V. Please have a grab sample analyzed and provide the contact information for the analysis.
- e. Section IX: Per Form 2C instructions, Section IX must be completed by a principal executive officer of at least the level of vice president. Please revise and resubmit these forms. Please Ohio EPA also notes that Priority Air Charter, LLC and Preferred Airparts, LLC operate at this location. It is unclear to Ohio EPA the relationship between Priority Air Charter, LLC and Preferred Airparts, LLC. Please provide this information.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Ken Eng, Wayne County Health Department
Todd Surrena, Ohio EPA, DSW, CO

File/Industrial/Priority Air Charter, LLC/PC (3IN00349)