Ohio EPA
40 years and moving forward

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

July 12, 2013

Mr. Matthew Croup
PI&I Motor Express in Middletown, Ohio
P.O. Box 685
Sharon, PA 16146

RE: PI&I Motor Express, Inc. Permit 1GR01175
Compliance Enforcement Inspection (CEI)

Dear Mr. Croup:

On June 27, 2013, I conducted a CEI at the above referenced facility. Jim Zaremski represented the facility. A copy of my inspection report is enclosed.

As noted towards the end of the report, the facility may qualify for No Exposure Certification (NEC). The report contains links regarding NEC should you wish to pursue NEC. Should you choose to maintain Industrial Storm Water permit 1GR01175, the following items (which are discussed in detail in the report) need to be addressed:

Routine Facility Inspection records (1/quarter), Comprehensive Annual Facility Inspection records (1/year), and Quarterly Visual Assessment records (one/quarter) need to be kept for at least 3 years from the date coverage began under your current permit.

Currently, there is no defined outfall structure from which to obtain a storm water sample. Construction of outfall point(s) where storm water samples could readily be obtained needs to be done to comply with permit 1GR01175.

If you have any questions or comments concerning the contents of this letter, please feel free to contact me at (937) 285-6103 or maureen.ware@epa.state.oh.us.

Sincerely,

Maureen M. Ware
Environmental Specialist
Division of Surface Water

MW/kb

Enclosure

cc: Jim Zaremski

Industrial Storm Water Compliance Enforcement Inspection

Name of facility; PI & I Motor Express Inc.
Address; 6394 Trenton-Franklin Rd.
Middletown, Ohio 45042
Permit number; 1GR01175 **Applicable permit sector**; P
Date of visit; 6/27/13 **Time started**; 9:00AM **Time ended**; 11:30 AM
Facility representative(s); Jim Zaremski
OEPA inspector; Maureen Ware

SWP3;

A. Did the facility representative produce a SWP3? Yes

The SWP3 for this facility includes an assessment for Potential Pollutant Sources specific to Sector P including the following activities and facility areas that could contribute to pollutants to storm water discharges: Fueling areas – Steel double wall construction is used for the above ground diesel fuel tank. To prevent vehicles from damaging the tank, concrete bollards are at the corners of the cement pad upon which the tank is located. Leakage potentials are addressed in a separate Spill Prevention Plan. The Spill Prevention Plan also addresses trucks awaiting maintenance that are noted to have leakage of oil, diesel, etc. While the facility is not on public sewers, the on-site sewage disposal system (septic tank and leach lines) has never failed and is not expected to fail, and as such, is not considered to be a Potential Pollutant Source. Floor drains in the vehicle maintenance building have previously been sealed off. All washing of trucks is done off-site at Blue Beacon facilities, so vehicle wash water is not a potential pollutant source at this facility.

A1. Did the SWP3 include a site map? Yes

The Drainage Area Site Map for this facility identified the following areas where activities occurring may be exposed to precipitation/surface runoff: fueling stations and the diesel tank. Truck loading/unloading areas are all off-site.

A2. Did it include schedules and procedures for the Routine Facility Inspections (RFI)? Yes

A daily visual inspection is conducted at the facility. The facility was not aware that RFI records for once each quarter need to be kept of inspections they conduct for 3 years. The facilities' SWP3 notes Additional Control Measures/Best Management Practices (BMPs) including:

a. Vehicle and Equipment Storage Areas: To minimize the potential for storm water exposure to leaky or leak-prone vehicles/equipment awaiting maintenance the following are used: drip pans are used under vehicles/equipment; indoor storage of vehicles and equipment (maintenance buildings); use of absorbents; roofing or covering storage areas; and dry cleaning of pavement surfaces to remove oil and grease.

b. Fueling Areas: To minimize contamination of storm water runoff from fueling areas the facility has a roof over the fueling area and uses dry cleanup methods for any spills.

c. Material Storage Areas: The facility maintains and stores all material storage vessels (e.g., for used oil/oil filters, spent solvents, paint wastes, hydraulic fluids) indoors to prevent contamination of storm water and plainly labels them (e.g., "Used Oil," "Spent Solvents," etc.) Dry cleanup methods are used for spills.

d. Vehicle and Equipment Maintenance Areas: To minimize contamination of storm water runoff from all areas used for vehicle/equipment maintenance all maintenance activities are done indoors.

e. Employee Training: Personnel are trained at least once a year to address the following activities: used oil and spent solvent management and vehicle fueling procedures. Vehicle paint jobs to be done are sent off-site to body shops. To ensure proper disposal of old batteries, an old battery for a new battery exchange is used when new batteries are needed. Old tires are exchanged for new tires in the same fashion.

A double wall tank is used for the fuel tank. If leaks occur, Oil Dry granular material is used to remove any leakage. The amount of fuel that should be in the tank is known, and if it differs from the level sensor, that is how a leak on the internal wall would be discovered. Minor spills are dealt with through the Spill Prevention/Response Plan. In the event of a major spill, the facility would use HazMatOne (a company that deals with large spills). Daily inspections are conducted just before the facility opens. Documentation will be maintained in the future for at least one routine inspection per quarter (and kept for 3 years). While weather conditions at the time of the inspections were not recorded, it will be in the future. The need to have at least one inspection done per year during a rain event while a discharge is happening with documentation was discussed.

A3. Did the SWP3 include schedules and procedures for the comprehensive annual facility inspection? Yes

It was noted that the annual comprehensive facility inspection can be equivalent to an RFI except it must include a review of the previous years' records for RFIs and quarterly visual assessments. Records for comprehensive annual facility inspections must be kept for 3 years.

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? No

Until now, the facility was not aware of the requirement to do a quarterly visual assessment of storm water discharges. The facility is now aware that a quarterly visual assessment must be done, with at least one of the quarterly assessments being conducted during a rain event. The assessments must include the following:

a. Sample location (outfall #s);
b. Sample collection date/time;
c. Visual assessment of the samples including:
    1. Color
    2. Odor
    3. Clarity
    4. Floating solids
    5. Settled solids

6. Suspended solids
7. Foam
8. Oil sheen
9. Any other indicator of polluted storm water

d. Name and signature of person conducting the visual assessment
e. Nature of the discharge (i.e., runoff or snowmelt)
f. Likely sources of any observed contamination
g. Was the sample collected within the 1st 30 minutes of the rain event and at least 72 hours from the last storm event?

In addition, a quarterly visual inspection of the following areas must be documented:

h. Storage areas for vehicles/equipment awaiting maintenance
i. Fueling areas
j. Indoor and outdoor vehicle/equipment maintenance areas
k. Material storage areas, vehicle/equipment cleaning areas and loading/unloading areas

Currently, no defined area exists that a sample of discharging storm water could readily be obtained. For the front of the facility, you may wish to consider constructing a small "V" shaped berm area off to the side so as not to disturb any vehicles coming into or out of the site. At the neck of the "V" (downhill end), the runoff should be deep enough to obtain a sample in a clear vessel. A similar berm area could be constructed at the lowest spot in the back of the facility if there is an adequate change in elevation.

Records of Routine Facility Inspections, Comprehensive Annual Inspections, and Quarterly Visual Inspections can be kept electronically provided there is a way to electronically "date stamp" the Records (such as using pdf).

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? N/A

Comments; Sector P Land Transportation and Warehousing SIC 4213 does not have required benchmarks.

Inspection records:

B. Were inspection records available? No.

Comments: The facility was not aware that records needed to be kept. They indicated that they will do so from now on.

Site Observations;

C. Are materials stored exposed to weather? Yes.

If Yes, list materials. Tires to be recycled are stored outside when the area indoors is at full capacity for tire storage. The outdoor tires do not appear to be causing any issues with storm water runoff.

D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens. Yes – most of the site has permeable pavement. With the exception of the front of the site, the site is

mostly flat thus increasing the amount of storm water that is absorbed through the permeable pavement instead of being discharged.

E. Number of outfalls from site/number inspected: N/A

At this time, no defined outfall sites exist. As noted earlier in this report, constructing a "V" shaped berm area may provide a deep enough area for collecting a stormwater sample at the front and possibly even the back of the site.

F. Did any show evidence of pollutants discharged in the storm water? N/A

G. Other observations/comments;

It is possible that the site may qualify for a No Exposure Certification. However, two issues would first need to be addressed: There was a dumpster in the gated off area rented to the shingle storage company. If it is not already covered, the dumpster will need to be covered. Secondly, there was a red dump trailer with tires, scrap metal, etc. in it at the back of the facility. The dump trailer will need to be covered.

Once these two issues are dealt with, you may wish to consider applying for a No Exposure Certification Form (includes instructions) , which can be found at: http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater_NoExposure.docx or in pdf form at: http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater_NoExposure.pdf A fact sheet can be found at: http://www.epa.gov/npdes/pubs/fact4-0.pdf and a guidance document can be found at: http://www.epa.gov/npdes/pubs/noxguide.pdf