Ohio EPA
40 years and moving forward

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

July 22, 2013

Mr. John Hinners
Petermann Ltd.
8401 Hosbrook Road, Suite 330
Cincinnati, Ohio 45236

RE: Petermann Ltd. Permit 1GR01111, Compliance Enforcement Inspection (CEI)

Dear Mr. Hinners:

On July 10, 2013, Joe Reynolds and I conducted a CEI at the Petermann Ltd. facility at 1324 Middletown-Eaton Rd. A copy of my inspection report is enclosed. The inspection report notes the need for a few SWP3 modifications in order to be in compliance with permit OHR000005. A summary of the modifications is as follows:

- The disposal method noted in the SWP3 for the wash water needs to include an attachment of all pertinent documentation/information (e.g., frequency, volume, destination, etc.)

- The site map needs to indicate where the location is for the outfall from which the quarterly visual assessment is made, and the location and ownership status of the small above ground fuel tank (approximately 5' long by 3' diameter) that was stored in the NW corner of the fenced bus parking area.

- Sector P facilities have unique issues that need to be noted as being covered in BMPs for employee training section including: used oil and spent solvent management, fueling procedures, proper painting procedures, and used battery management.

As the facility is a Sector P (SIC Code 4151), the SWP3 Quarterly Visual Stormwater Quality Assessment also needs to include all the following areas/activities (as applicable):

- Storage areas for vehicles/equipment awaiting maintenance
- Fueling areas
- Indoor and outdoor vehicle/equipment
- Maintenance areas
- Material storage areas
- Vehicle/equipment cleaning areas
- Loading/unloading areas

You may wish to consider applying for a No-Exposure Certification, which can be found at: http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater_NoExposure.pdf or http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater_NoExposure.docx. If you feel you do not qualify for a No-Exposure Certification, please provide an electronic copy of the facility's SWP3 to me, with modifications as noted above, by 10/15/13. 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.ohio.gov.

Sincerely,

Maureen M. Ware
Environment Specialist II
Division of Surface Water

MMW/tb

Enclosure

Industrial Storm Water Compliance Enforcement Inspection

Name of Facility: Peterman LTD

Address: 1324 Middletown-Eaton Rd
Middletown, Ohio 45042

Permit Number: 1GR01111 **Applicable Permit Sector:** P

Date of Visit: 7/10/13 **Time Started:** 9:00 **Time Ended:** 11:00

Facility Representative(s): John Hinners

OEPA Inspector: Maureen Ware and Joe Reynolds

SWP3:

A. Did the facility representative produce a Storm Water Pollution Prevention Plan (SWP3)? Yes

The SWP3 for Petermann LTD -Madison facility includes an assessment for Potential Pollutant Sources for the following activities and facility areas (with descriptions) that could contribute to pollutants to storm water discharges: bus fueling areas; leaks/drips from buses or employee vehicles; leaks from open waste bins; and leaks/drips/spills from the shed.

A reference regarding bus wash water that was provided in the SWP3 for the Petermann LTD – Madison facility states: "Washing of the buses shall be performed by a contractor that is equipped to contain and recover the vehicle wash water. Vehicle washing shall not be done in a way that allows detergents or rinse water to mix with or enter the storm water discharge system." It further notes: "Wash buses under cover, off-site, or collect wash water".

The disposal method noted in the SWP3 for the wash water needs to include an attachment of all pertinent documentation/information (e.g., frequency of washing, volume of water used, destination of used water, etc.)

A1. Did the SWP3 include a site map? Yes

The Drainage Area Site Map for this facility in the SWP3 identifies and indicates whether activities occurring there may be exposed to precipitation/surface runoff as being: the fueling area; storage areas for vehicle/equipment with actual or potential fluid leaks; and the area where storage of wastes occur (waste bin).

The site map needs to indicate the location for the outfall from which the quarterly visual assessment is made. It appears to be at the SE corner of the intersection of the driveway to the bus parking area and the entrance drive.

A small above ground fuel tank (approximately 5' long by 3' diameter) was stored in the NW corner of the fenced bus parking area. In a phone conversation, Mr. Hinners indicated that the fuel tank is owned by the school district, and not Petermann LTD. It would be helpful to have a notation on the site map noting the fuel tank and its ownership status.

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

The RFIs are done quarterly. The sample RFI form in appendix E of the SWP3 indicates that a record is made and kept for the pollution control measures employed at the facility at the time of an RFI. The RFIs are done when the facility is in operation. Weather conditions in the sample RFI report can be noted as being clear, cloudy, rain, sleet, fog, snow, high winds, temperature, and other. The RFI report has an area to indicate if a discharge was happening at the time of the RFI, with an area for a description. The SWP3 also specifies that at all RFIs should be done during a significant storm water runoff. Please note that only one out of the 4 quarterly RFIs must be conducted during a discharge event.

The SWP3 includes Additional Control Measures/Best Management Practices (BMPs) as required for Sector P facilities. To minimize the potential for storm water exposure to leaky or leak-prone vehicles/equipment awaiting maintenance, drip pans under vehicles/equipment is used, as are absorbents. The shed on site is under roof and serves to store bus maintenance liquids. A spill clean-up kit is maintained on-site to minimize contamination of storm water runoff from fueling areas in the event of a fuel spill. A building is used for bus maintenance. If repairs and/or replacements of BMP control measures are needed, the SWP3 notes the facility's plans for making repairs or replacements. Spill Prevention and Response procedures noted in the SWP3 include: Assure the safety of employees in the area; All attempts should be made to stop the spill at its source; Identify the spilled material; Notify the emergency/safety coordinator; Contain the material in smallest possible area; Begin the notification procedures; Recover or cleanup the spilled material; Prepare an internal report; and Evaluate the SWP3 and amend if necessary. The SWP3 indicates that as part of the BMPs and additional control measures personnel are trained at least once a year to address the following activities, as applicable: Goals of the SWPPP, Record Keeping, Preventative Maintenance, Good Housekeeping Procedures, Visual Inspection Procedures, Safety Measures, Spill Prevention and Response, Other Topics Pertaining to Storm Water.

To help you comply with Sector P facility employee training requirements, the following also needs to be noted as being covered in employee training in the SWP3: used oil and spent solvent management, fueling procedures, proper painting procedures, and used battery management.

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

The facility uses the USEPA's Annual Reporting Form for the Comprehensive Annual Facility Inspection reporting purposes.

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? Yes
The SWP3 documents the quarterly visual assessment for: Sample location (outfall #s); Sample collection date/time; Visual assessment of the samples including: color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other indicator of polluted storm water; Name and signature of person conducting the visual assessment; Nature of the discharge (i.e., runoff or snowmelt); Likely sources of any observed contamination; and if the sample was collected within the 1st 30 minutes of the rain event and at least 72 hours from the last storm event. The visual assessment form has helpful indicators for describing the quality of any odor, clarity, and oil sheen that may be noted.

As the facility is a Sector P (SIC code 4151), the SWP3 Quarterly Visual Stormwater Quality Assessment also needs to include all the following areas/activities (as applicable): Storage areas for Vehicles/equipment awaiting maintenance; Fueling areas; Indoor and outdoor vehicle/equipment Maintenance areas; Material storage areas; Vehicle/equipment cleaning areas; and Loading/unloading areas.

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

Inspection records:

B. Were inspection records available? Not evaluated

Comments: Due to a mix up regarding where to meet at the site, I was unable to meet Mr. Hinners. However, via phone, he indicated that records were kept for all the inspections, and that they are available any time for review. The SWP3 Mr. Hinners provided electronically includes samples of each inspection form required by the SWP3.

Site Observations:

C. Are materials stored exposed to weather? No

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, permeable pavement is used where the buses are parked. The swale the storm water discharges to was vegetated.

E. Number of outfalls at site inspected: 1 (SE corner of entrance drive/bus parking lot drive)

F. Did any show evidence of pollutants discharged in the storm water? No

G. Other observations/comments: