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

July 31, 2013

RE: AGLAND CO-OP INC
NPDES PERMIT 3IN00287
SFY 2013 CEI
MAHONING COUNTY

Joe Toporcher Sr., Safety Administrator
Agland Co-op Inc
PO Box 369; 364 Lisbon Street
Canfield, OH 44406

Mr. Toporcher:

On June 26, 2013, this writer conducted an inspection of the petroleum bulk storage and distribution facility in Alliance. The bulk facility is located at 14949 Oyster Road in Alliance. The intent of the inspection was to evaluate operations and maintenance of the facility and evaluate compliance with the National Pollutant Discharge Elimination System (NPDES) Permit.

Following is a list of observations and discussions at the time of the inspection:

1. According to the file, all storm water runoff from the covered loading rack area is directed to the oil/water separator by a concrete pad sloped to collection drains. The pad was generally free of any product residues at the time of the inspection.

2. Safety equipment discussed during the inspection is as follows.

   a. The Scully System monitors product levels in the truck tanks and automatically shuts off the fill pumps so that tank overflows are prevented.

   b. Each truck is fitted with emergency brake safety locks. This system automatically sets the truck brakes while the fill hoses are attached.

   c. In the event the brake safety locks should fail and the truck is moved while the fill hoses are attached, emergency valves on the hoses automatically close as the hoses are detached from the truck.

3. During the inspection, it was explained that trucks transporting product into the facility are required to unload into the bulk storage tanks only from the concrete pad surrounding the loading rack. Any spills are collected onto the pad where they can be properly managed. Any small spills can be cleaned from the pad prior to entering the collection system. If the spills are significant, the product enters the collection system and is directed to the treatment system where it can be stored for proper handling.

4. A new spill kit is needed for the loading rack area. The existing spill kit is insufficient, and when an attempt was made to open the kit, the lid was difficult to remove. The new spill kit will be placed in an area of the loading rack where it will be easy to access.

5. The treatment system includes a baffled storage tank, a rope skimmer, a lift pump that transfers water to a storage basin, and an oil storage tank. According to a file drawing, the baffled storage tank has a volume of 8,000 gallons.

   The storage pond has a controlled outfall to contain any oil sheen that may accumulate. Flow volume reported to Ohio EPA is based on the known volume in the basin per foot of depth

6. We discussed the condition of the storage basin during the inspection. The decayed plant material discussed during the 2012 inspection had not been removed from the basin. In addition, emergent plants were observed in the basin and presumably rooted in the decayed plant material at the bottom of the basin. Conditions are only going to get worse if the basin is not properly cleaned of all decayed plant material in the near future.

   One scenario for cleaning the basin included discharging the clean water off the surface of the basin through Outfall 001, and then pumping the organic material from the bottom. The decayed organic material should then be hauled offsite for proper disposal. Please provide a response to this inspection report outlining the actions that will be taken to clean the basin, and include the disposal location for the organic material.

   Cleaning the basin may correct two problems. Recent pH levels in the treated wastewater have been elevated. Cleaning the basin may correct the elevated pH problem. In addition, nutrients released by the decayed vegetation may be supporting the plant growth covering the surface of the basin. Eliminating the nutrient source may prevent the growth of the floating plants.

7. Samples for pH must be analyzed within 15 minutes of collecting the samples. The time limit requires that pH samples be analyzed on site. We discussed the possibility of 1st Choice Energy Services monitoring pH at the various facilities including the Alliance facility. It was agreed that 1st Choice Energy Services will purchase a pH meter and the buffer solutions to properly calibrate the meter. It is recommended that buffer solutions 7 and 10 be purchased to properly calibrate the meter. The pH meter must be calibrated each morning before use, and the probe must be properly rinsed and cleaned after each use. Another option for analyzing pH samples within the 15 minute time period is to hire a contract lab to collect samples and analyze the pH sample onsite.

8. We discussed the need to properly train site personnel on spill response procedures. Since the concrete pad surrounding the loading rack discharges to the treatment system, training for spills on the pad will focus on containing the spill within the treatment system. However, spills in gravel areas must be addressed differently since these spills flow in different direction across the property. A record of training events must be maintained by identifying the personnel present and their signatures.

9. Finally, Part IV of the permit requires 1st Choice Energy Services to develop a Storm Water Pollution Prevention Plan (SWP3). Part IV of the permit should be reviewed to determine if the requirements for an SWP3 are redundant relative to the SPCC. If the requirements in Part IV are found to be redundant, a request to modify the NPDES Permit to remove parts IV, V and VI can be submitted to Ohio EPA. In the event the SPCC plan does not include all items listed in Part IV, an SWP3 must be completed. We talked about completing the SWP3 by the end of September 2013.

Please contact this office at (330)963-1251 or at john.kwolek@epa.state.oh.us. To discuss any question you may have. Please provide a response to this inspection report by August 23, 2013. This response should include the following:

- The actions that will be taken to clean the basin including the disposal location for the plant residue to be removed.

Sincerely,

John Kwolek
District Engineer
Division of Surface Water
Northeast District Office

JK/cs

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
3IN00287	OH0123510	CEI	S	I
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
6/26/2013			No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Agland Co-op Inc	5/1/2012
	Permit Expiration Date
	4/30/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Name and Title of Responsible Official	Phone Number
Joe Toporcher Sr., Safety Administrator	(330) 424-7229

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	Recent pH violations
S	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
S	Receiving Waters	
M	Laboratory	pH must be analyzed within 15 min. of collecting sample

Comments:

Signatures	
John Kwolek	7/31/13
John Kwolek, Inspector	Date

Compliance Data for Agland Co-op Inc between 6/1/2012 to 6/1/2013

Summary
Permit Effluent Limit Violations: 2
Permit Effluent Code Violations: 0
Permit Effluent Frequency Violations: 2
Compliance Schedule Milestones Not Entered: 0

Limit Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2013	001	pH	1D Conc	9.0	9.25	3/15/2013
April 2013	001	pH	1D Conc	9.0	9.16	4/24/2013

Frequency Violations

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2012	001	Phenol	1/Quarter	1	0	12/1/2012
December 2012	001	Naphthalene	1/Quarter	1	0	12/1/2012

SECTION D: PERMIT VERIFICATION

(a) Correct name and mailing address of permittee ..... Y
(b) Correct name and location of receiving waters ..... Y
(c) Products and production rates conform with permit application ..... N/A
(d) Flows and loadings conform with NPDES permit ..... N/A
(e) Treatment processes are as described in permit application ..... Y
(f) New treatment process added since last inspection ..... N
(g) Notification given to State of new, different or increased discharges ..... N/A
(h) All discharges are permitted ..... Y
(i) Number and location of discharge points are as described in permit ..... Y

Comments:

SECTION E: COMPLIANCE

(a) Any significant violations since the last inspection ..... N
(b) Permittee is taking actions to resolve violations ..... N/A
(c) Permittee has a compliance schedule ..... N/A
(d) Permittee is meeting compliance schedule ..... N/A

SECTION F: OPERATION AND MAINTENANCE

(a) Standby power available ..... N
If yes, what type?
(b) Adequate alarm system available for power or equipment failures ..... N/A
(c) All treatment units in service other than backup units ..... Y
(d) Routine and preventative maintenance scheduled and performed ..... Y
(e) Any major equipment breakdown since last inspection ..... N
(f) Operation and maintenance manual provided and maintained ..... N

SECTION G: SELF-MONITORING PROGRAM

a) Primary flow measuring device. ***Depth of basin discharged.***
b) Actual flow discharged is measured ..... Y
c) Sampling location(s) are as specified by permit ..... Y
d) Parameters and sampling frequency agree with permit ..... Y
e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) ..... N/A

SECTION H: Laboratory

a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... N
b) If alternate procedures are used, are they properly approved? .....
c) Analysis performed more frequently ..... N
If yes, are results recorded in permittee's report? ..... :
d) Quality assurance manual provided and maintained ..... N
e) Calibration and maintenance of instruments is satisfactory? ..... N/A
f) Results of last U.S. EPA quality assurance ..... N/A
Date:

Comments: pH is held more than 15 min. prior to analysis.

SECTION I: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	N/A	N	N	N	N	N	N	

Comments:

SECTION H: MULTIMEDIA OBSERVATIONS

a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories ..... N
b) Do you notice staining or discoloration of soils, pavement or floors ..... N
c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
e) Do you notice any unusual odors or strong chemical smells ..... N
f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

1) What is the cause of the condition?
2) Is the observed condition or source a waste product?
3) Where is the suspected contaminant normally disposed?
4) Is this disposal permitted?
5) How long has the condition existed and when did it begin?

Comments: