



EPA

40 years and moving forward

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

August 15, 2013

RE: COLUMBIANA COUNTY
WELLSVILLE PETROLEUM OFF-LOADING FACILITY
NPDES PERMIT NO. OHC000004
OHIO EPA PERMIT NO. 3GC06477*AG
CONSTRUCTION STORM WATER

Matt Vicenik
Arrowhead Utica Pipeline, LLC
1201 Louisiana Street
Suite 1400
Houston, OH 77002

Dear Mr. Vicenik:

On August 1, 2013, Ohio EPA conducted a storm water inspection at Wellsville Petroleum Off-Loading Facility, located between Clark Avenue and the Ohio River, Village of Wellsville, Columbiana County (site). The site was represented by Dan Wilkos of the Murphy Contracting Company; Ashley Wasington of Hilcorp Energy Company; and Tim Whitman of Dawood Construction. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GC06477*AG.

Storm Water Inspection

The inspection documented the following:

- The site's storm water pollution prevention plan (SWP3) was available during the inspection.
- The sediment settling pond had been installed; however, the outlet structure has not been constructed. The outlet structure is expected to be completed by August 10, 2013.
- Silt socks have been installed on the site as a perimeter sediment control. Unfortunately, gaps between many of the silt sock sections were present. The silt socks must be repositioned to eliminate the gaps and to prevent sediment-laden storm water runoff from discharging offsite. Via an e-mail dated August 9, 2013, Mr. Whitman provided documentation that the silt socks had been repositioned to eliminate the observed gaps.
- A storm sewer inlet was present onsite that did not have any best management practice (BMP) installed to prevent the discharge of sediment-laden storm water runoff to "waters of the state." Via an e-mail dated August 9, 2013, Mr. Whitman provided documentation that inlet protection had been installed around the storm sewer inlet.

- Silt socks were depicted to be installed parallel to the onsite roadway that was being constructed. The silt socks were not installed in the locations depicted on the SWP3. The silt socks must be installed in the locations depicted on the SWP3.

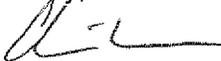
Corrective Action

The following corrective actions must be implemented:

- A written report that details how the above deficiency has been or will be addressed must be submitted to Ohio EPA. The written report must also include dates detailing when each corrective action (i.e. BMP) was or will be implemented and completed.
- A copy of the site's post-construction operation and maintenance (O&M) plan must be submitted to Ohio EPA. For your convenience, the site's post-construction O&M plan must be a stand-alone document, which contains:
 - (1) A designated entity for storm water inspection and maintenance responsibilities;
 - (2) The routine and non-routine maintenance tasks to be undertaken;
 - (3) A schedule for inspection and maintenance;
 - (4) Any necessary legally binding maintenance easements and agreements; and
 - (5) A map showing all access and maintenance easements.
- A copy of the site's SWP3 must be submitted to Ohio EPA for review.

The above corrective actions must be submitted to Ohio EPA within ten days of receiving this correspondence. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail at chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM:bo

ec: Matt Vicenic, Arrowhead Utica Pipeline, LLC
Ashley Washington, Hilcorp Energy Company
Michael Gentile, The Murphy Contracting Company
Tim Whitman, Dawood Construction