40 years and moving forward

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

August 20, 2013

RE: DLB OIL WILLAMSFIELD BULK PLANT
OHIO EPA PERMIT 3IN00290
WILLIAMSFIELD TWP, ASHTABULA CO.
COMPLIANCE INSPECTION EVALUATION

Mr. David L. Bailes
D & D Landholding Company, LLC.
dba DLB Oil, Inc.
2091 U.S. Route 322
Willamsfield, OH 44093

Dear Mr. Bailes:

On August 19, 2013, a site inspection was conducted at the above referenced facility at 2091 U.S. Route 322, Williamsfield Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody represented D & D Landholding Company, LLC (DD) and D.L.B. Oil Company, Inc. (DLB) during the inspection, although I spoke briefly with Shawn Dunbar both before and following the inspection. The site is owned by DD and operated by DLB. 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. The last compliance inspection was conducted on September 6, 2012.

The system consists of drains to collect potential fuel spills from fuel loading pads, an 8,000 gallon oil-water separator and skimmer via an under-drain system within the pad, and cavity water sump to a lined evaporation pond. The site also has a separate storm sewer collection system consisting of parking lot drains and associated piping. The evaporation pond discharges to a ditch and larger pond created from a borrow pit along State Route 11 northeast of the facility. No backup power is provided to the facility, and the facility is provided with visual and audio alarms.

During the inspection, the following items were noted and discussed:

1. The retail gasoline pump has been relocated from along fence at the east entrance to northwest of the diesel fuel loading racks. No other changes were noted in the operation of the facility over the September 6, 2012, inspection.

2. The bulk plant receives petroleum product by large tanker trucks. The product is then off loaded and stored in one of seven underground storage tanks (USTs) and a single above ground storage tank AST (two 15,000 gallon USTs, five 10,000 gallon USTs, and one 4,000 gallon AST). There is a 2,000 gallon AST specifically for retail sales of gasoline. Empty tanks are stored in designated areas and are labeled.

3. Petroleum product is delivered to the facility via large tanker trucks and off-loaded into the tank farm at the loading/unloading rack area.

4. DLB loads smaller tanker trucks and delivers the product to their customers.

5. Sanitary wastes are discharged to an onsite septic tank and leach bed that is not a part of this NPDES permit.

6. The loading/unloading rack area consists of a cement pad with a canopy top. The cement is graded so that any product spill or storm water that hits the pad will be routed to an 8,000 gallon oil/water separator and skimmer via an under drain system within the pad. Some surface staining and fresh drips were noted during the inspection.

7. Plastic totes of hydraulic tractor fluid, motor oil, gear oil, and used antifreeze are stored just south of the evaporation pond. Some staining of the ground was noted along the west and northwest side of the property. This area should be cleaned up and the contaminated soils managed as a minimum as a solid waste.

8. The above ground tank has an earthen dike around it. All dike water is routed through the same 8,000 gallon oil water separator and skimmer. The separator-skimmer was functioning at the time of the inspection. Following the oil/water separator and skimmer, the dike water along with any water or released product from the loading/unloading rack pad is then routed to a storm water retention pond.

9. The oil/water separator (OWS) for the industrial storm water is inspected at least monthly and the oil levels recorded. The OWS is cleaned as needed, with the oil removed for off-site disposal.

10. Storm water from the scale area is pumped inside the dike area and routed through the oil/water separator and skimmer. Following treatment, the storm water is routed to a lined evaporation pond.

11. The evaporation pond is lined and has a cap on the discharge line which must be opened in order for any discharge to occur. The cap was found ajar, but no discharge was noted. Mr. Dunbar indicated that the cap may have been loosened by personnel trimming grass along the fence within the past few days. Mr. Dunbar was instructed to replace the cap. No discharge was occurring at the time of the inspection. The water surface was observed as clear and free of any sheen.

12. A log book of inspections, repairs and observations is maintained at the facility. The storm water treatment system is operated by DLB staff, assisted by URS Consultants of Cleveland, Ohio. URS personnel perform routine operations at the wastewater treatment system, monitor the facility, and perform the pH sampling. Frank Marsek of URS submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Quarterly and annual analytical work is sent to Test America for analysis.

13. 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 April 27, 2011. The latest annual site certification inspection was conducted on April 27, 2011. Employee training on the SWPPP was conducted in April 2011. Ohio EPA could locate no records of plan review, annual certification, or employee training on the plan for 2012 or 2013. Mr. Dunbar indicated that Mr. Marsek may have this information.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period August 1, 2012 through August 1, 2013, indicates the following apparent noncompliance of the terms and conditions of your NPDES permit:

Limit, Reporting, and Compliance Schedule Violations

No violations of your effluent reporting limits, reporting frequency, or compliance schedule violations were noted for the time period reviewed.

Other NPDES Permit Violations - Storm Water Pollution Prevention Plan(s): A copy of your SWPPP/SPCCC was available for inspection. The latest version was revised April 27, 2011. These documents **must** be reviewed at least annually or whenever there is a change in key personnel or ownership and revised accordingly as prescribed by Part IV of your NPDES permit. The SWPPP documents must also reflect specific contacts and telephone numbers, annual inspections, and annual certification of the plan. Please provide a schedule of when you expect to have the SWPPP/SPCCC document updated and provide this office with a copy of the revised SWPPP/SPCCC documents for review.

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:bo

pc: Frank Marsek, URS Consultants

File: Industrial/DLB Oil Williamsfield Bulk Plant/pc