



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

August 16, 2013

RE: WESTERN RESERVE FARM COOPERATIVE
OHIO EPA PERMIT 3GB00005
JEFFERSON TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Paul Rzeszortarski
Western Reserve Farm Cooperative
P.O. Box 339
Middlefield, OH 44062

Dear Mr. Rzeszortarski:

On August 15, 2013, a site inspection was conducted at the above referenced facility at 196 East Satin Street (corner of East Satin St. and Sycamore Street), Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. You represented Western Reserve Farm Cooperative during the inspection. 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 and a pre-permit inspection associated with the renewal of this permit. The last compliance inspection was conducted on May 8, 2012.

The system consists of drains to collect potential fuel spills from fuel loading pads, a 6,000-gallon oil-water separator (OWS), and a cavity water sump and drain. The site also has a separate storm sewer collection system consisting of parking lot drains and associated piping. The facility discharges to an unnamed tributary of Cemetery Creek east of the facility. No backup power is provided to the facility, and the facility is provided with no alarms.

Observations and Notations

The following observations and notations were made during the inspection:

1. No process changes are noted from the last inspection.
2. Storm drains appeared reasonably free of debris and operable at the time of the inspection.
3. The OWS was appropriately labeled. The OWS is checked twice annually and the oil level noted. To date, the OWS has not needed pumping due to the low amount of oil accumulated in the unit.
4. Vehicle loading areas were free of evidence of spills.
5. No water was observed in fueling bays.
6. The final discharge pipe at the unnamed tributary to Cemetery Creek to the east and north of the facility was observed as not discharging due to a lack of flow.

7. The general permit requires monitoring of the facility for certain parameters if a discharge has occurred. A discharge is any water that flows through the OWS.
8. The OWS for the industrial storm water is inspected monthly and the oil levels recorded. The OWS is cleaned twice yearly, and the oil incinerated in a waste oil heater onsite.
9. Samples are collected by Ream and Haagar Laboratories. Ream and Haagar performs on-site analysis of pH and Mr. Rzeszortarski performs visual observations of oil and grease severity, precipitation and flow. Ream and Haagar Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples. Mr. Rzeszortarski submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
10. As a part of the inspection, Ohio EPA reviewed the Spill Prevention Control and Countermeasure Plan (SPCCC plan). The plan was written on December 23, 2009 and has been examined annually since then, noting no changes. The last inspection of the facility was conducted on April 20, 2012. The annual certification was dated December 21, 2012. Training on the plan was last conducted on December 21, 2012. The last monthly inspection was conducted on July 29, 2013.

NPDES Permit Compliance Review

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

Effluent Limit Violations

The following effluent limit violations were noted for the time period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	4.5	6/6/2013
001	50060	Chlorine, Total Residual	1D Conc	0.019	1.	6/6/2013

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any effluent violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at [http://epa.ohio.gov/portals/35/permits/24-hour Report FactSheet.pdf](http://epa.ohio.gov/portals/35/permits/24-hour%20Report%20FactSheet.pdf). Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. Ohio EPA did not receive notification of the June 2013 violations as required by your permit. Please provide Ohio EPA an explanation as to why these violations occurred, along with measures taken to ensure that they are not repeated.

During the inspection, we discussed the pH violation. It was determined that the sample was collected by Western Reserve Cooperative (WRC) staff while you were on vacation, and that the pH sample was sent in for laboratory analysis instead of being taken onsite with a portable instrument. For future reference, the maximum holding time (from collection to analysis) for a pH sample is 15 minutes. WRC should contract to have the pH taken with a calibrated pH meter following an approved method in 40 CFR 136 or obtain its own pH meter.

Reporting Violations

No reporting code violations are noted; however the following reporting frequency violations are noted for the time period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01300	Oil and Grease Severity	1/Month	1	0	11/01/2012
001	00400	pH	1/Month	1	0	03/01/2013
001	00550	Oil and Grease, Total	1/Month	1	0	03/01/2013
001	00045	Total Precipitation	1/Month	1	0	03/01/2013
001	00335	Chemical Oxygen Demand	1/Month	1	0	03/01/2013
001	00056	Flow Rate	1/Month	1	0	03/01/2013

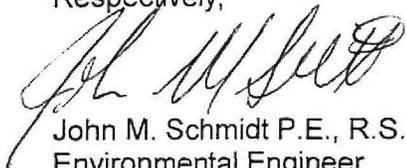
Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any reporting frequency or code violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. Ohio EPA did receive notification of the November 2012 violation on December 12, 2012, indicating that there had been an error in entering the data in the eDMR and requesting how to correct it. Ohio EPA provided a response indicating that the November 2012 eDMR could be amended. While the amended eDMR did correct the flow reporting, the oil and grease violation is still not resolved. Ohio EPA did not receive notification of the March 2013 violations as required by your permit. Please provide Ohio EPA an explanation as to why the December 2012 and March 2013 data were not collected, along with measures taken to ensure that they are not repeated. We discussed this during the inspection and you would verify that the proper data is reported into the eDMR system.

Compliance Schedule

Your NPDES permit does not contain a compliance schedule.

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/cs

File/SP/Ashtabula/Jefferson/Western Reserve Co-Op (3GB00005)

