

240 W. Front
City of NAPOLEON, OHIO

255 RIVERVIEW AVENUE - (419) 592-4010
NAPOLEON, OHIO 43545-0151



June 19, 1992

Mayor
Steven Lankenau

Members of Council
Terri A. Williams, President
John E. Church
Michael J. DeWit
Dennis L. Filgor
Robert G. Heft
James Hershberger

City Manager
Terry Dunn

Finance Director
Rupert W. Schweinhagen

Law Director
Michael J. Wesche

Prosecuting Attorney
Thomas L. Bischoff

Mr. Jerry Marks
Mark's Auto
240 West Front St.
Napoleon, Ohio 43545

Re: Sanitary Sewer Violations

Dear Mr. Marks:

This letter is a followup to the site visit Roger Noblit and the writer made to your facility.

As we had mentioned, we were receiving high concentrations of copper and lead and our initial sampling at your facility indicated a possible problem.

Subsequent later sampling has verified the source to be from your facility (see April 14, 1992 Memo attached).

One of our major concerns is the existence of the detention tank that handles all sewage from your building.

It is our understanding that when the previous owner hired Cornerstone Environmental to clean up the site, that no underground plumbing or tanks were included.

In addition, the City has expressed in previous correspondence (attached) to the Owner (Ken Robertson through Ed Rohrs Realty) that the tank and its open top needs to be eliminated. This would not only prevent sludge settled in the bottom of the tank to flow into the sanitary sewer system as well as eliminating storm water into the sanitary sewer.

As expressed in previous correspondence, there is also several cleanouts on the northside of the building that also allow storm water to flow into the sanitary sewer.

We would like a response to what action you will be taking by July 3, 1992.

Respectfully,

Marc S. Gerken, P.E.
City Engineer

MSG:rw

Enclosure

cc: Roger Noblit



2



1



3

Memo

To: Marc Gerken, City Engineer
From: Roger L. Noblit, Director of Water & Wastewater
Date: April 14, 1992
Re: Mark's Auto Samples

Attached you'll find the results of the samples that were taken at Mark's Auto, per your memo and our discussions concerning the high levels of copper and lead, that we were experiencing at the Wastewater Plant. As you can see from the attached results, there is no question as to where the high levels of lead and copper are coming from. I would suggest that we arrange a meeting with Mr. Marks to pursue this matter further. Also to date we have incurred in excess of \$650 in laboratory cost to have these samples analyzed. If you have any other questions, please contact me.



Chemical Analysis Data
Mark's Auto Parts

Sample Site	Mark's Auto	City Building	Mark's No.1	Mark's No.2	Mark's Sludge
Sample Date	3/24/92	4/1/92	4/1/92	4/1/92	4/1/92
<u>Parameter</u>	<u>Results</u>	<u>Results</u>	<u>Results</u>	<u>Results</u>	<u>Results</u>
Cadmium	<1 ug/l	1 ug/l	45 ug/l	45 ug/l	<1 ug/l
T. Chromium	<5 ug/l	<5 ug/l	70 ug/l	92 ug/l	268 ug/l
Hex. Chromium	<5 ug/l	<5 ug/l	<5 ug/l	<5 ug/l	<5 ug/l
Copper	504 ug/l	25 ug/l	40 ug/l	1,409 ug/l	<2 ug/l
Lead	1,705 ug/l	21 ug/l	1,011 ug/l	6,233 ug/l	<10 ug/l
Mercury	0.2 ug/l	<0.2 ug/l	<0.2 ug/l	0.28 ug/l	24 ug/l
Nickel	<9 ug/l	16 ug/l	212 ug/l	212 ug/l	100.2 ug/l
Zinc	467 ug/l	73 ug/l	7,329 ug/l	6,625 ug/l	132,464 ug/l

<u>Parameter</u>	<u>Limits</u>
Cadmium	10 ug/l
T. Chromium	22 ug/l
Hex Chromium	22 ug/l
Copper	500 ug/l
Lead	20 ug/l
Mercury	0.3 ug/l
Nickel	5,000 ug/l
Zinc	2,000 ug/l

GINOSKO LABORATORIES, INC.

17875 CHEROKEE STREET
HARPSTER, OHIO 43323

TELEPHONE
(614) 496-4051
(614) 496-4571

FACSIMILE
(614) 496-4121

Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: March 27, 1992

Date Received: March 25, 1992

Laboratory No. 032592-35
Sample Date 03-24-92
Sample I.D. Mark's Auto Parts
Sample Type: Grab

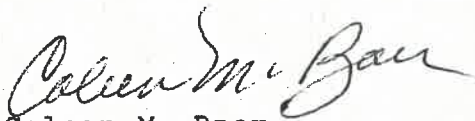
Parameter	Result	Unit
Cadmium	<1	ug/l
T. Chromium	<5	ug/l
Hex.-Chromium	<5	ug/l
Copper	504	ug/l ✓
Lead	1705	ug/l ✓
Mercury	0.2	ug/l
Nickel	<9	ug/l
Zinc	467	ug/l

All analyses are performed in accordance with 40 CFR part 136.

Thank you for this opportunity to serve your organization.

Sincerely,

William F., Pfeiffer, Ph.D.
Director of Operations
Laboratory Analyst Class IV
Certificate #4-87-37


Coleen M. Baer
Laboratory Director
Laboratory Analyst Class IV
Certificate #4-89-05

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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-38
Sample Date April 1, 1992
Sample I.D. MARK'S AUTO- Sludge
Sample Type: Grab
Sample Time: None Given

Parameter	Result	Unit
Arsenic	0.006	mg/kg <i>22 ug/l</i>
Cadmium	<0.001	mg/kg <i><1</i>
T. Chromium	7.273	mg/kg <i>268 ug/l</i>
Hex.-Chromium	<0.005	mg/kg <i><5 ug/l</i>
Copper	<0.002	mg/kg <i><2 ug/l</i>
Lead	<0.010	mg/kg <i><10 ug/l</i>
Mercury	0.6495	mg/kg <i>24 ug/l</i>
Nickel	2722.511	mg/kg <i>100,188 ug/l</i>
Silver	<0.010	mg/kg <i><10 ug/l</i>
Zinc	3599.559	mg/kg <i>133,464 ug/l</i>
Cyanide (No sample)	**	mg/kg <i>(.0368) * 1000 = 36.8 (Zinc)</i>

** - All samples received at Ginosko Lab. were preserved with Nitric Acid. These samples could only be analyzed for Metals. Samples received for Cyanide must be preserved with Sodium Hydroxide. Samples for Oil & Grease must be preserved with Sulfuric Acid.

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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-34
Sample Date April 1, 1992
Sample I.D. CITY BUILDING- Upstream
Sample Type: Grab
Sample Time: 3:10 PM

Parameter	Result	Unit
Cadmium	1	ug/l
T. Chromium	<5	ug/l
Hex.-Chromium	<5	ug/l
Copper	25	ug/l
Lead	21	ug/l
Mercury	<0.2	ug/l
Nickel	16	ug/l
Silver	<10	ug/l
Zinc	73	ug/l
Cyanide (No sample)	**	

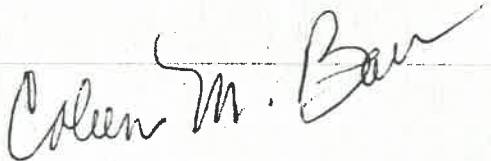
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(614) 496-4571

Attention: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992
Date Received: April 2, 1992

Laboratory No. 040292-36
Sample Date April 1, 1992
Sample I.D. MARK'S AUTO #1
Sample Type: Grab
Sample Time: 2:50PM

Parameter	Result	Unit
Cadmium	45	ug/l
T. Chromium	70	ug/l
Hex.-Chromium	<5	ug/l
Copper	40	ug/l
Lead	1011	ug/l
Mercury	<0.2	ug/l
Nickel	212	ug/l
Silver	<10	ug/l
Zinc	7329	ug/l
Cyanide	**	

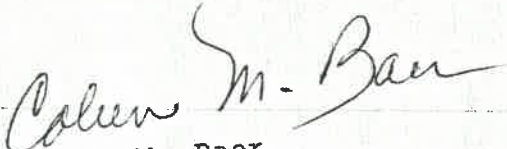
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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-37
Sample Date April 1, 1992
Sample I.D. MARK'S AUTO #2
Sample Type: Grab
Sample Time: None Given

Parameter	Result	Unit
Cadmium	45	ug/l
T. Chromium	92	ug/l
Hex.-Chromium	<5	ug/l
Copper	1409	ug/l
Lead	6233	ug/l
Mercury	0.28	ug/l
Nickel	212	ug/l
Silver	<10	ug/l
Zinc	6625	ug/l
Cyanide (No sample)	**	
Oil & Grease (No Sample)	**	

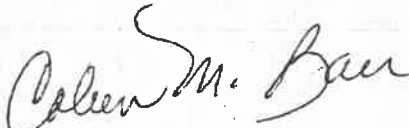
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Coleen M. Baer
Laboratory Director
Laboratory Analyst Class IV
Certificate #4-89-05

MEMORANDUM

TO: Roger Noblit, Water/Wastewater Superintendent
Sonny Helberg, Construction Inspector
Terry Dunn, City Manager

FROM: Marc S. Gerken, P.E.; City Engineer

DATE: March 31, 1992

SUBJECT: High Discharge Concentrations/Marks Auto
(Old Elite Plating Plant) Front Street

Due to recent test results of samples taken by Bob Brubaker at the manhole as illustrated on the attached drawing, we suspect that discharge from the drains and detention tanks of the old plating company may be leading to excessive levels of copper and lead.

Therefore, as per my discussions with Roger Noblit, we will take more samples as follows:

- (1) Sample the same manhole point as previously done.
- (2) Sample at an upstream manhole source.
- (3) Sample at a downstream manhole source.
- (4) Pull a sample of sludge at the bottom of detention tank (also determine the depth of sludge).

In addition, we need to dye test the existing sewers to determine inflow/infiltration elimination.

My intent is to let the new owner (Mr. Marks) know what he will have to do to eliminate the situations we determine from our review and analysis.

In my discussions with Cornerstone Environmental, they indicated to me that their contact with the previous owner (Mr. Robertson) only pertained to inside cleanup and no liquid runoff was allowed into the floor drains. I am sending a letter to them requesting information regarding test results and the actual scope of work.

MSG:rw

Attachment

GINOSKO LABORATORIES, INC.

17875 CHEROKEE STREET
HARPSTER, OHIO 43323

TELEPHONE
(614) 496-4051
(614) 496-4571

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(614) 496-4121

Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-34
Sample Date April 1, 1992
Sample I.D. CITY BUILDING- Upstream
Sample Type: Grab
Sample Time: 3:10 PM

Parameter	Result	Unit
Cadmium	1	ug/l
T. Chromium	<5	ug/l
Hex.-Chromium	<5	ug/l
Copper	25	ug/l
Lead	21	ug/l
Mercury	<0.2	ug/l
Nickel	16	ug/l
Silver	<10	ug/l
Zinc	73	ug/l
Cyanide (No sample)	**	

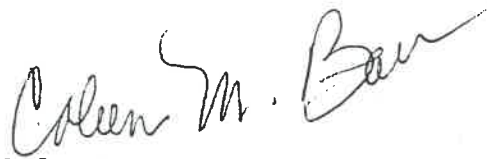
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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-35
Sample Date April 1, 1992
Sample I.D. ARROW MOLDED PLASTICS INC.
Sample Type: Grab
Sample Time: None Given

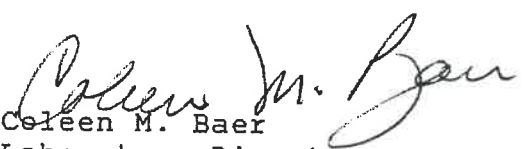
Parameter	Result	Unit
Cadmium	<1	ug/l
T. Chromium	<5	ug/l
Hex.-Chromium	<5	ug/l
Copper	2	ug/l
Lead	<10	ug/l
Mercury	<0.2	ug/l
Nickel	48	ug/l
Zinc	189	ug/l

All analyses are performed in accordance with 40 CFR part 136.

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Sincerely,

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Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-36
Sample Date April 1, 1992
Sample I.D. MARK'S AUTO #1
Sample Type: Grab
Sample Time: 2:50PM

Parameter	Result	Unit
Cadmium	45	ug/l
T. Chromium	70	ug/l
Hex.-Chromium	<5	ug/l
Copper	40	ug/l
Lead	1011	ug/l
Mercury	<0.2	ug/l
Nickel	212	ug/l
Silver	<10	ug/l
Zinc	7329	ug/l
Cyanide (No sample)	**	


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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-37
Sample Date April 1, 1992
Sample I.D. MARK'S AUTO #2
Sample Type: Grab
Sample Time: None Given

Parameter	Result	Unit
Cadmium	45	ug/l
T. Chromium	92	ug/l
Hex.-Chromium	<5	ug/l
Copper	1409	ug/l
Lead	6233	ug/l
Mercury	0.28	ug/l
Nickel	212	ug/l
Silver	<10	ug/l
Zinc	6625	ug/l
Cyanide (No sample)	**	
Oil & Grease (No Sample)	**	


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Sincerely,

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Laboratory Director
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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: April 9, 1992

Date Received: April 2, 1992

Laboratory No. 040292-38
Sample Date April 1, 1992
Sample I.D. MARK'S AUTO- Sludge
Sample Type: Grab
Sample Time: None Given

Parameter	Result	Unit
Arsenic	0.006	mg/kg
Cadmium	<0.001	mg/kg
T. Chromium	7.273	mg/kg
Hex.-Chromium	<0.005	mg/kg
Copper	<0.002	mg/kg
Lead	<0.010	mg/kg
Mercury	0.6495	mg/kg
Nickel	2722.511	mg/kg
Silver	<0.010	mg/kg
Zinc	3599.559	mg/kg
Cyanide (No sample)	**	mg/kg

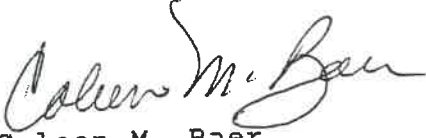
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Sincerely,

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Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: February 10, 1992

Date Received: February 6, 1992

Laboratory No.	020692-29	020692-30
Sample Date	02-06-92	02-06-92
Sample I.D.	Sludge	Final Effluent
Sample Type:	Grab	Grab
Sample Time:	8:40AM <i>15.32% S.S., 0.05</i>	8:15AM

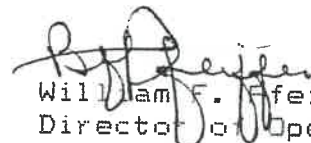
Parameter	Result	Unit	Result	Unit
Ammonia -N	1724.28	mg/kg		
Cadmium	5.230	mg/kg	7	ug/l
T. Chromium	32.327	mg/kg	6	ug/l
Hex.-Chromium			<5	ug/l
Copper	98.769	mg/kg	27	ug/l
Lead	58.717	mg/kg	26	ug/l
Mercury			<0.2	ug/l
Nickel	25.232	mg/kg	27	ug/l
Zinc	245.81	mg/kg	89	ug/l
Oil & Grease			2	mg/l

All analyses are performed in accordance with 40 CFR part 136.

Thank you for this opportunity to serve you organization.

Sincerely,

Coleen M. Baer
Laboratory Director


William F. Pfeiffer, Ph.D.
Director of Operations

GINOSKO LABORATORIES, INC.

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HARPSTER, OHIO 43323

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(614) 496-4121

TELEPHONE
(614) 496-4051
(614) 496-4571

Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: March 10, 1992

Date Received: March 5, 1992

Laboratory No. 030592-41
Sample Date March 5, 1992
Sample I.D. Final Effluent
Sample Type: Grab
Sample Time: 8:40AM

Parameter	Result	Unit
Cadmium	2	ug/l ✓
T. Chromium	<5	ug/l ✓
Hex.-Chromium	<5	ug/l ✓
Copper	13	ug/l ✓
Lead	40	ug/l ✓ (46) (20 mg/l)
Mercury	<0.2	ug/l ✓
Nickel	53	ug/l ✓ (38 ug/l)
Zinc	129	ug/l ✓
Oil & Grease	8	mg/l ✓

All analyses are performed in accordance with 40 CFR part 136.

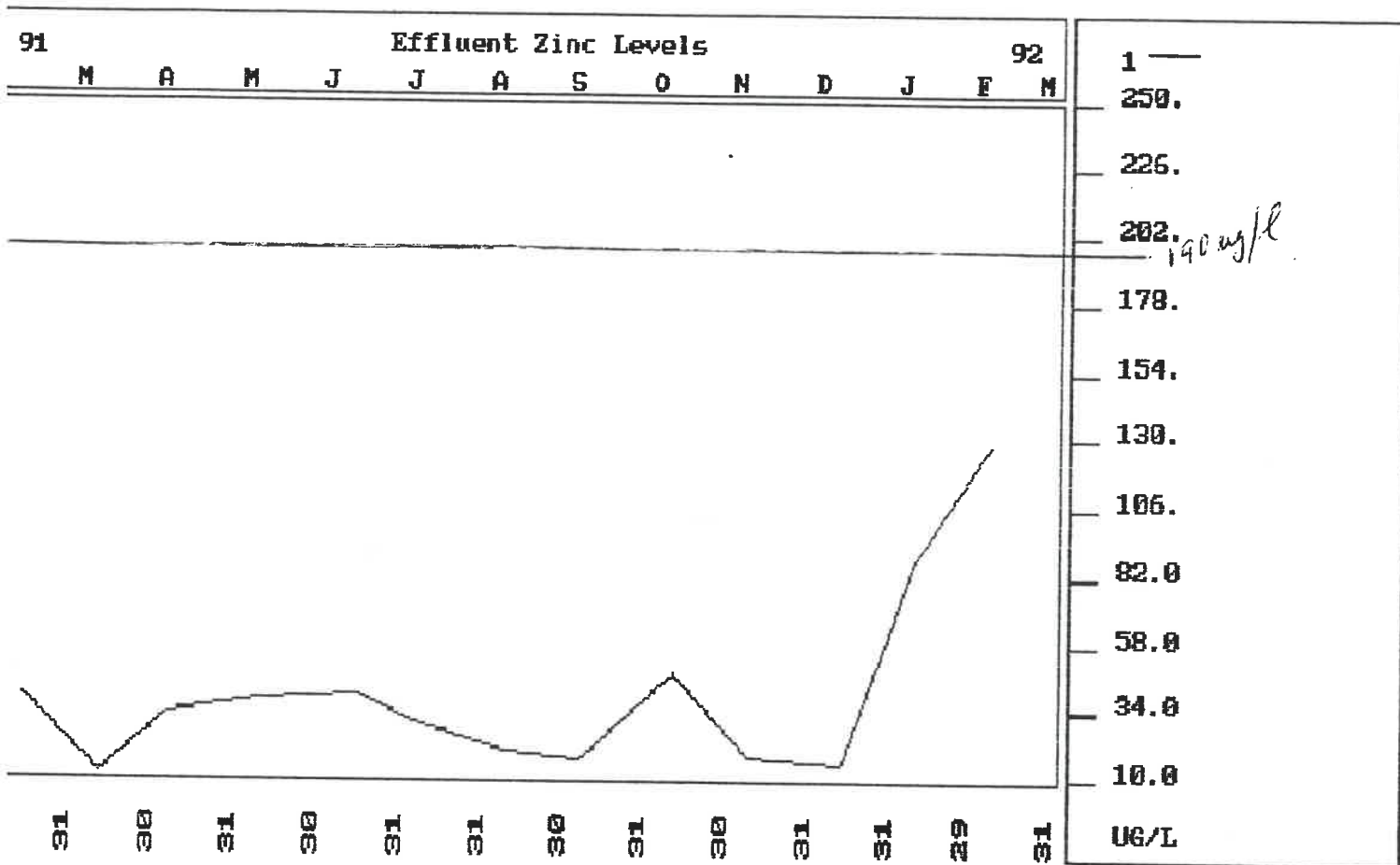
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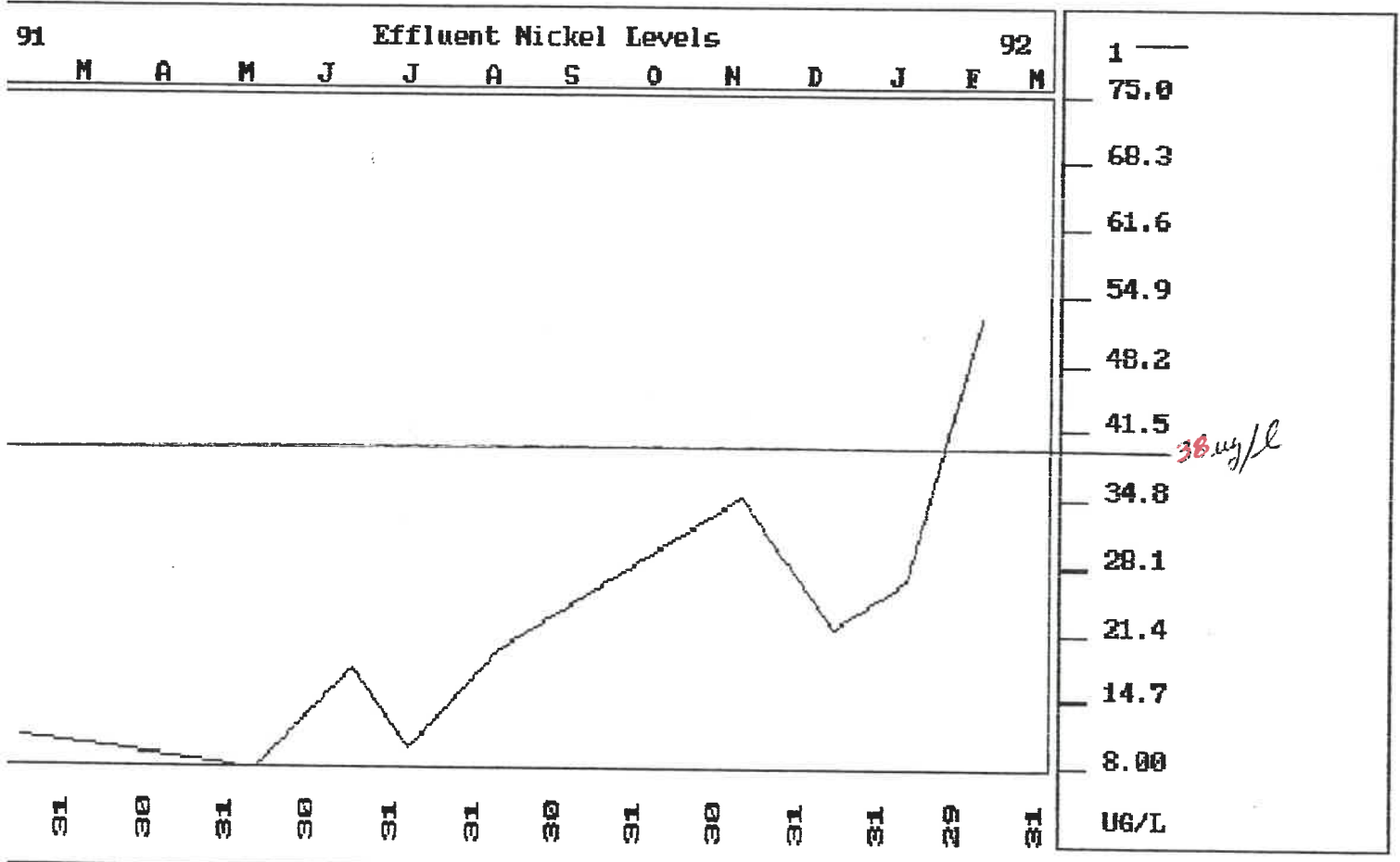
Coleen M. Baer
Coleen M. Baer
Laboratory Director
Laboratory Analyst Class IV
Certificate #4-89-05

DATE PRINTED 03-31-92



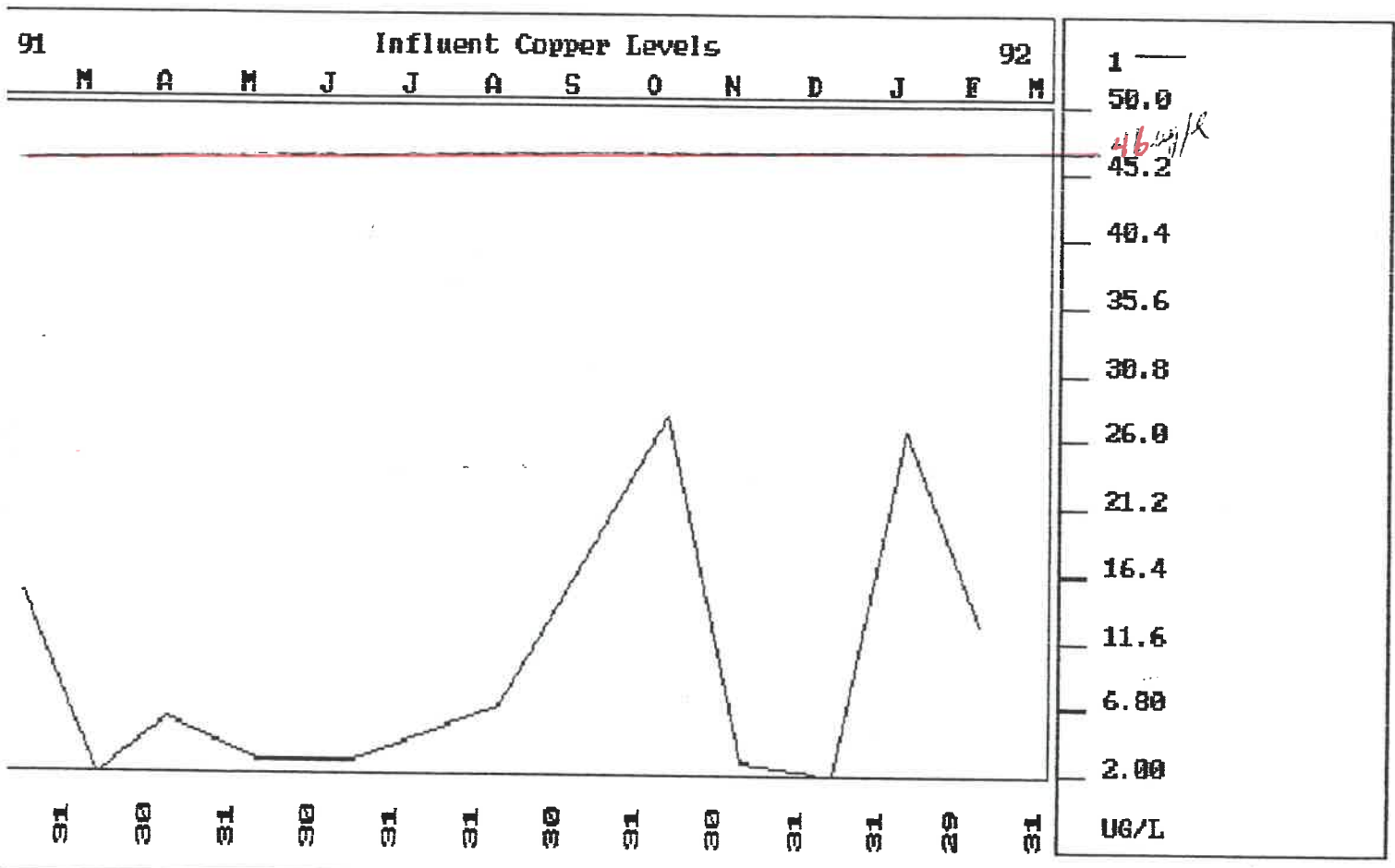
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DATE PRINTED 03-31-92



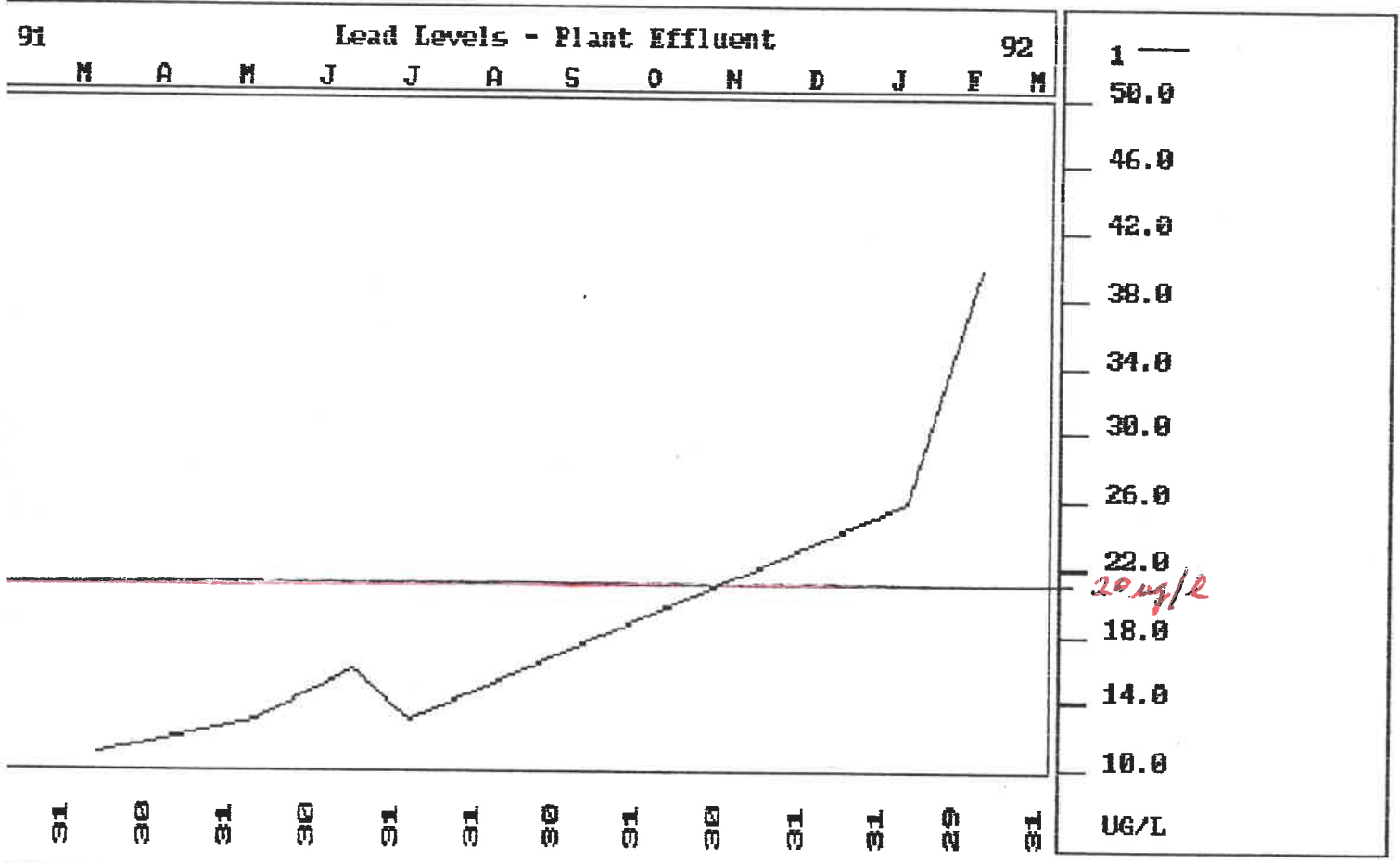
1. FINEFF NICKEL-NI-TOTAL UG/L

DATE PRINTED 03-31-92



1. FINEFF COPPER-CU-TOT UG/L

DATE PRINTED 03-31-92



1. FINEFF LEAD-PB-TOT ug/l UG/L

GINOSKO LABORATORIES, INC.

17875 CHEROKEE STREET
HARPSTER, OHIO 43323

TELEPHONE
(614) 496-4051
(614) 496-4571

FACSIMILE
(614) 496-4121

Attn: Mr. Roger Noblit
City of Napoleon Wastewater Treatment Plant
P.O. Box 1519
Napoleon, OH 43545

Date Reported: March 27, 1992

Date Received: March 25, 1992

Laboratory No. 032592-35
Sample Date 03-24-92
Sample I.D. Mark's Auto Parts
Sample Type: Grab


Parameter	Result	Unit
Cadmium	<1	ug/l
T. Chromium	<5	ug/l
Hex.-Chromium	<5	ug/l
Copper	504	ug/l ✓
Lead	1705	ug/l ✓
Mercury	0.2	ug/l
Nickel	<9	ug/l
Zinc	467	ug/l

All analyses are performed in accordance with 40 CFR part 136.

Thank you for this opportunity to serve your organization.

Sincerely,

William F., Pfeiffer, Ph.D.
Director of Operations
Laboratory Analyst Class IV
Certificate #4-87-37


Coleen M. Baer
Laboratory Director
Laboratory Analyst Class IV
Certificate #4-89-05

Commercial & Industrial Wastes

No Commercial or Industrial Wastes of a deleterious nature shall be discharged into the City's Sanitary Sewer System, that prior to mixing with sanitary sewage do not meet the following limitations:

- a. Have a pH greater than 9.0 or less than 6.5 .
- b. Contain Cyanide greater than 0.02 ppm.
- c. Contain more than 1.0 ppm of Hexavalent Chromium.
- d. Contain more than 0.5 ppm of Trivalent Chromium.
- e. Contain more than 5.0 ppm of Nickel as Ni. (5000 $\mu\text{g}/\text{l}$)
- f. Contain more than 2.0 ppm of Zinc as Zn. (2000 $\mu\text{g}/\text{l}$)
- g. Contain more than 50 ppm of Chloroform extractable substances.
- h. Contain more than 0.50 ppm of Copper. (500 $\mu\text{g}/\text{l}$)
- i. Contain more than 0.01 ppm of Cadmium.
- j. Contain more than 0.3 ppb of Mercury.
- k. Contain more than 0.02 ppm of Lead. (20 $\mu\text{g}/\text{l}$)
- l. Contain more than 7.0 ppm of Phosphorus.
- m. Contain more than 250 ppm of Suspended Solids.
- n. Contain more than 200 ppm of BOD by weight.

