

PURPOSE OF INSPECTION

The purpose of the inspection by the U.S. Environmental Protection Agency (USEPA) at Bellaire Harbor Services LLC (Bellaire Harbor or Facility) was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and their National Pollutant Discharge Elimination System (NPDES) permit.

BACKGROUND

Bellaire Harbor performs repairs and services for shipping barges in addition to purchasing decommissioned barges to break down and sell for parts or scrap. Bellaire Harbor has two locations: the “470 Landing” location at 6350 Guernsey Street, Bellaire, Ohio 43906 (River Mile 91.9 of the Ohio River), and the “Marine Ways” location at 4102 Jefferson Street, Bellaire, Ohio 43906 (River Mile 93.8 of the Ohio River). Materials such as coal and pig iron, along with large amounts of scrap metal, are stored in piles outdoors at the 470 Landing location. Urea is also received from barges at the Marine Ways location and stored in a covered warehouse.

Bellaire Harbor’s industrial activities and stormwater discharges at the 470 Landing location are covered by the Ohio Environmental Protection Agency (OEPA) Industrial Stormwater General Permit (Permit) (OEPA Facility ID # 0GR00472*CG; Federal NPDES Identifier # OHR000007). The Permit’s coverage has an Effective Date of August 9, 2022, and an Expiration Date of May 31, 2027.

INSPECTION

Jake Berger and Andi Hodaj of USEPA first arrived at Bellaire Harbor’s 470 Landing location at 8:20 a.m. EST and were met by Vince DiFabrizio (Foreman). Roger Garretson (Environmental, Health, and Safety Director) arrived at 8:31 a.m. EST. Jake Berger and Andi Hodaj (inspectors) showed Mr. DiFabrizio and Mr. Garretson their inspector credentials. The inspectors began the opening conference and were granted a walkthrough of the site.

Opening Conference

USEPA staff explained that the purpose of the inspection was to:

- Review Bellaire Harbor’s records, including sample measurements, monitoring activities, and stormwater plans, as required by the Permit for Facility ID# 0GR00472*CG;
- Conduct a walkthrough of the Facility at both the 470 Landing and the Marine Ways locations;
- Identify locations where stormwater control had the potential to be insufficient; and
- Inform Bellaire Harbor of areas of concern observed during the records review and site walkthrough.

The Facility walkthrough at the 470 Landing location began at 8:31 a.m. EST. At 8:44 a.m. EST, Bob Harrison (Owner) joined the inspection. The Facility walkthrough at the 470 Landing

location ended at 9:38 a.m. EST and Jake Berger, Andi Hodaj, Bob Harrison, and Roger Garretson exited to travel to the Marine Ways location.

In the office building at the Marine Ways location, USEPA began the records review portion of the inspection with Roger Garretson at 10:00 a.m. EST. The records review concluded at 11:10 a.m. EST, and the Facility walkthrough of the Marine Ways location with Roger Garretson began at 11:15 a.m. EST. The Facility walkthrough of the Marine Ways location ended at 11:42 a.m. EST and was immediately followed by the closing conference.

Facility Walkthrough

USEPA staff made the following observations during the Facility walkthrough, further documented in the Photograph Log (attached):

- Storage totes stored outside lacked secondary containment at the 470 Landing location (Photos 1, 3, 4, and 16) and at the Marine Ways location (Photos 22, 23, and 24).
- No stormwater control mechanisms are being implemented to prevent stormwater that comes in contact with materials or pollutant sources from entering the Ohio River along the edges of the property at the 470 Landing location (Photos 3 – 16, 20, and 21). Section 2.1 of the Permit requires you to select, design, install, and implement control measures.
- Stormwater runoff gullies that lead into the Ohio River are evident at the 470 Landing location, indicating a lack of stormwater control (Photos 6, 7, 9, 10, 11, and 15).
- Materials such as pig iron, coal, and dirt are stored in large, uncovered piles directly at the edge of the Ohio River at the 470 Landing location. There are no barriers or stormwater control mechanisms around these piles, and there is no containment along the edge of the property/Ohio River to prevent the material from easily spilling into the river (Photos 8 – 15).
- Urea that is spilled at the loading dock is left in small piles near the Ohio River underneath the loading conveyor system at the Marine Ways location (Photo 21).

Records Review

USEPA identified the following areas of concern during the records review:

- Section 2.1.2.9 of the Permit requires Bellaire Harbor to “train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of your Pollution Prevention Team. Training shall cover both the specific control measures used to achieve the conditions in this Part, and monitoring, inspection, planning, reporting, and documentation requirements in other parts of this permit. Ohio EPA requires that training be conducted at least annually.” Bellaire Harbor has no records of providing any employee training related to stormwater pollution prevention.

- Section 4.1.1 of the Permit requires Bellaire Harbor to conduct Routine Facility Inspections of all areas of the Facility where industrial materials or activities are exposed to stormwater and of all stormwater control measures at least once each calendar quarter. Bellaire Harbor has no record of ever performing these inspections.
- Section 4.2.1 of the Permit requires Bellaire Harbor to conduct Quarterly Visual Assessments of stormwater discharges. Bellaire Harbor has no record of ever performing these inspections.
- Section 5 of the Permit requires Bellaire Harbor to prepare a Stormwater Pollution Prevention Plan (SWPPP). Bellaire Harbor has no record of ever having prepared a SWPPP.
- Section 6.2.1 of the Permit requires Bellaire Harbor to conduct Benchmark Monitoring of industrial stormwater. Bellaire Harbor has no record of ever having conducted Benchmark Monitoring.
- Section 7.1 of the Permit requires Bellaire Harbor to complete an Annual Report using the Annual Reporting Form located in Appendix I of the Permit. Bellaire Harbor has no record of ever having completed an Annual Report.

Closing Conference

USEPA staff relayed the following preliminary comments to Roger Garretson and Bob Harrison during the closing conference:

- The Permit requires Bellaire Harbor to continually perform activities such as employee training, Routine Facility Inspections, Quarterly Visual Assessments, SWPPP preparation, Benchmark Monitoring, and completing Annual Reports. Bellaire Harbor has no record of ever performing any of these required activities.
- Deficiencies were observed during the Facility walkthrough, such as containers lacking secondary containment, no implementation of stormwater control measures, evidence of stormwater runoff channels into the Ohio River, piles of pig iron and coal being stored with no containment directly on the edge of the Ohio River, and spilled urea underneath the loading conveyor system.

USEPA confirmed that no information collected during the inspection was considered Confidential Business Information.

USEPA concluded the inspection and left the Facility at 12:07 p.m. EST.

Bellaire Harbor Services LLC
EPA Inspection February 23, 2023
All photos taken by Jake Berger, Physical Scientist, U.S. EPA
Camera: Olympus Tough TG-6



1: P2230043

Description: Used diesel stored in totes

Location: 470 Landing

Camera Direction: Northeast

Date/Time: 02/23/2023 – 8:34 a.m. EST



2: P2230044

Description: Equipment staging area

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 8:39 a.m. EST



3: P2230045

Description: Dock area, pooled water around empty totes. A series of 5 30-foot wide defunct barges are attached to the natural shore/property edge on the river to use as the dock area.

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 8:49 a.m. EST



4: P2230046

Description: Concrete blocks at the edge of the dock area

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 8:51 a.m. EST



5: P2230047

Description: Dock area north of Photo 3

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 8:55 a.m. EST



6: P2230048

Description: Stormwater gully draining down into the dock area

Location: 470 Landing

Camera Direction: East

Date/Time: 02/23/2023 – 8:56 a.m. EST



7: P2230049

Description: Stormwater gully draining down into the dock area

Location: 470 Landing

Camera Direction: East

Date/Time: 02/23/2023 – 8:59 a.m. EST



8: P2230050

Description: Coal pile north of the docks. Coal is emptied out of the barges that are being worked on and is stored outside and uncovered.

Location: 470 Landing

Camera Direction: Northeast

Date/Time: 02/23/2023 – 9:03 a.m. EST



9: P2230051

Description: Coal on the edge of the river wall

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 9:06 a.m. EST



10: P2230052

Description: Coal pile; channelized runoff draining into the Ohio River

Location: 470 Landing

Camera Direction: East

Date/Time: 02/23/2023 – 9:07 a.m. EST



11: P2230053

Description: Coal pile and runoff channel next to the Ohio River

Location: 470 Landing

Camera Direction: Northeast

Date/Time: 02/23/2023 – 9:08 a.m. EST



12: P2230054

Description: Hydraulic oil drum next to the Ohio River

Location: 470 Landing

Camera Direction: Northeast

Date/Time: 02/23/2023 – 9:12 a.m. EST



13: P2230055

Description: Pile of pig iron and dirt stored next to the Ohio River with material seen on top of the wall edge.

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 9:14 a.m. EST



14: P2230056

Description: Coal remaining from a recently moved coal pile next to the Ohio River

Location: 470 Landing

Camera Direction: South

Date/Time: 02/23/2023 – 9:21 a.m. EST



15: P2230057

Description: Stormwater gully in a mixture of dirt and coal draining into the Ohio River

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 9:21 a.m. EST



16: P2230058

Description: Spent oil tote with no secondary containment near the Ohio River

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 9:22 a.m. EST



17: P2230059

Description: Ramp used to pull barges out of the Ohio River and into the facility for repair or deconstruction

Location: 470 Landing

Camera Direction: West

Date/Time: 02/23/2023 – 9:25 a.m. EST



18: P2230060

Description: Pooled water above the ramp with a visible oil sheen on it

Location: 470 Landing

Camera Direction: North

Date/Time: 02/23/2023 – 9:32 a.m. EST



19: P2230061

Description: Scrap pile in the middle area of the facility

Location: 470 Landing

Camera Direction: Southeast

Date/Time: 02/23/2023 – 9:34 a.m. EST



20: P2230062

Description: Empty barrels by the Ohio River at the southeast end of the property

Location: Marine Ways

Camera Direction: East

Date/Time: 02/23/2023 – 11:21 a.m. EST



21: P2230063

Description: Urea loading dock with piles of urea on the edge of the Ohio River

Location: Marine Ways

Camera Direction: East

Date/Time: 02/23/2023 – 11:27 a.m. EST



22: P2230064

Description: Container with used oil north of the entrance

Location: Marine Ways

Camera Direction: Southwest

Date/Time: 02/23/2023 – 11:38 a.m. EST



23: P2230065

Description: Text on used oil container in Photo 22

Location: Marine Ways

Camera Direction: Southwest

Date/Time: 02/23/2023 – 11:39 a.m. EST



24: P2230066

Description: Totes containing spent oil near the entrance gate

Location: Marine Ways

Camera Direction: North

Date/Time: 02/23/2023 – 11:41 a.m. EST