



Environmental
Protection Agency

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

October 13, 2011

Tim Duckwall
Calgon Carbon Corporation
400 Calgon Carbon Drive
P.O. Box 717
Pittsburgh, PA 15230

**Re: Storm Water Inspection at Barnesby Sutcliffe-A Calgon Carbon Co. / Franklin
County
Permit Number: 4GR00220*DG**

Dear Mr. Duckwall:

This letter is written in follow up to an industrial storm water inspection I conducted at Barnesby Sutcliffe-A Calgon Carbon Co. located at 835 North Cassady Avenue in Columbus, Ohio on September 29, 2011. The inspection was prompted via complaint submitted by the City of Columbus for the alleged unauthorized release of scrubber water in the approximate amount of 2500 gallons, directly into Alum Creek.

I understand this facility is currently covered under the General Storm Water Permit Associated with Industrial Activities. Based on my site observation and the conditions set forth in the storm water permit, the following items must be addressed:

Storm Water Pollution Prevention Plan (SWPPP):

- A Storm Water Pollution Prevention Plan (SWPPP) must be developed specific for this site. The SWPPP must address all materials and processes exposed to Storm water. A site map must be developed which clearly delineates all drainage patterns and storm water outfalls associated with this site. In addition, the site map must include the location of all Best Management Practices (BMPs) implemented to minimize the threat of storm water contamination. ***Please submit to my attention the most recent SWPPP for review. An electronic copy to my email at harry.kallipolitis@epa.ohio.gov is preferred.***

Notice of Violation:

- This letter serves as a formal notice of violation for the unauthorized release of scrubber water in the approximate amount of 2500 gallons directly into Alum Creek on September 23, 2011. Please note this release was reported by the City of Columbus. In accordance with the requirements of your general permit, all unauthorized releases must be reported to the Ohio EPA spill line at **1-800-282-9378**. Please implement corrective measures and training improvements to ensure all personnel are aware of the Ohio EPA spill line.

Scrubber Water Analysis:

- Please submit, to my attention, the most recent scrubber water analysis for review.

Draining Improvements:

- Please note that all personnel must be fully trained with the contents of the SWPPP. Annual training is a requirement of the general storm water permit. All training must be fully documented and inclusive in your SWPPP.

Spill Prevention Control and Counter Measure Plan (SPCC):

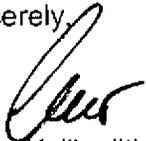
- All personnel must be trained with respect to spill prevention at this facility. In my opinion, there were ample opportunities to ensure that minimum discharges for unauthorized release flow into a separate storm water system. Contingencies, such as spill containment, can be provided at each catch basin to minimize a threat of release. Spill prevention must be addressed in your SWPPP.

Contingency Plan:

- Please submit to my attention, a short-term and long-term contingency plan to minimize potential threat of a similar release. Short-term measures would include, but not limited to, level indicators to address the potential release of scrubber water from the collection system. Long-term measures would include, but not limited to, leak detection associated with the waste water collection system.

If you have any questions regarding this letter, please do not hesitate to call me at our Central District Office at (614) 728-3844. In addition, please provide a short narrative with respect to the events which led to the unauthorized release. In addition, please respond to all action items aforementioned within 14 days of receipt of this letter. A follow up inspection will be conducted to evaluate all conditions associated with the General Industrial Storm Water Permit.

Sincerely,



Harry Kallipolitis
Storm Water Coordinator
Division of Surface Water
Central District Office

c: Jeff Bohne, Water Quality Supervisor, DSW/CDO
Brett Smith, City of Columbus, Division of Sewerage and Drainage