



Environmental  
Protection Agency

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

September 30, 2011

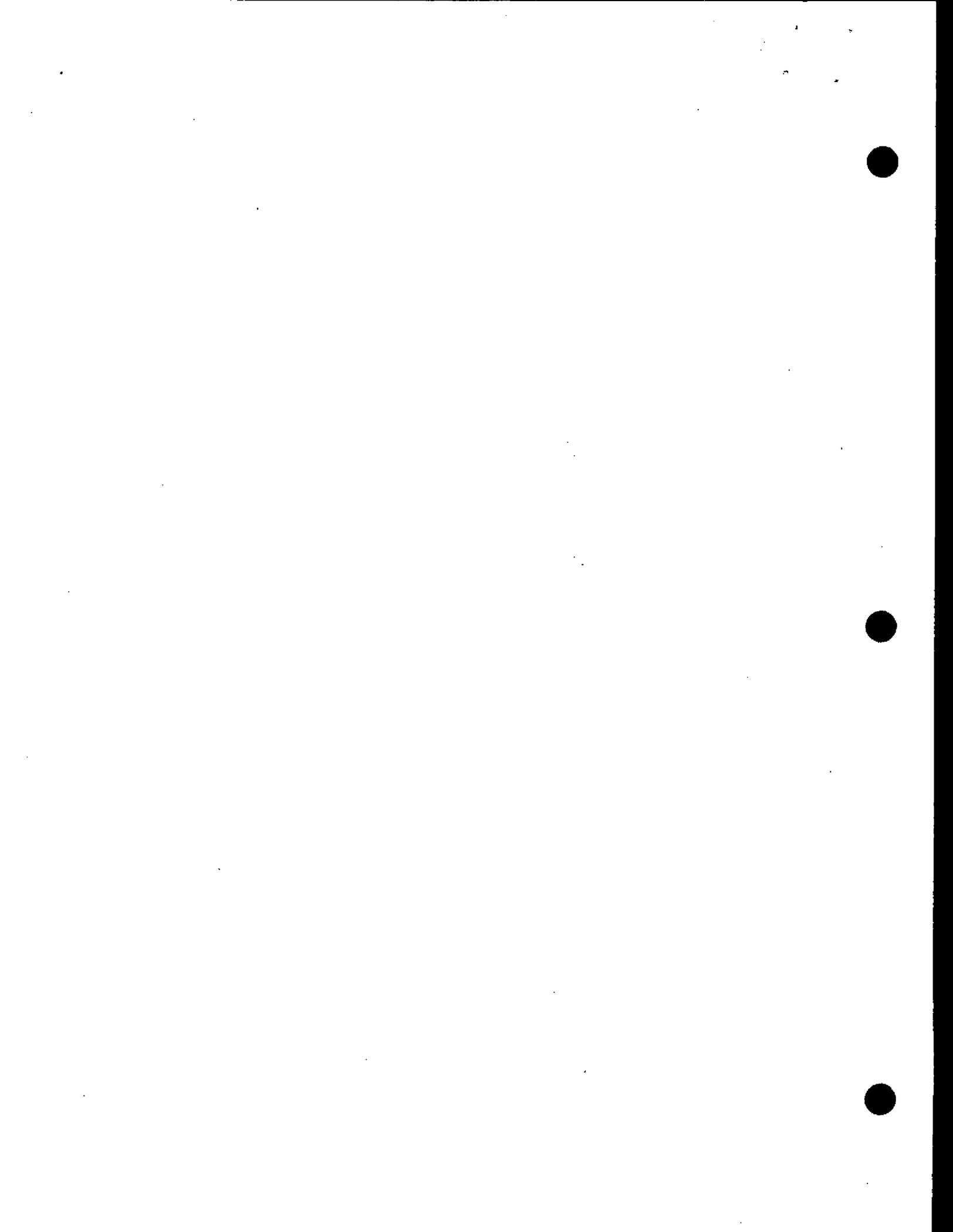
Mike Murphy  
1015 Marion Road  
Columbus, OH 43207

**Re: RockTenn / Franklin County  
fka, Smurfit-Stone Recycling Company  
Industrial Storm Water Permit 4GR00467\*DG**

Dear Mr. Murphy:

This letter is written in regard to the storm water inspection that I conducted at RockTenn located at 1015 Marion Road in Columbus, Ohio. The inspection was conducted on September 20, 2011, to insure compliance with your industrial storm water general permit. The following items were noted during the inspection, also please see attached pictures:

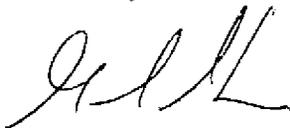
1. Activities in the maintenance shop were discharging oil and grease to a storm water drain. New controls and best management practices need to be put in place to prevent the discharge of oil and grease to the storm water drain.
2. Storm water drains had filters and was collecting debris. You stated that the filters were cleaned as needed. There were metal screens on the storm water drain and the storm water basin that discharged from your property. The storm water basin had excessive debris. Please clean and maintain the filters, screens and sediment basin on a routine maintenance schedule. You stated that the storm water basin was scheduled to be cleaned.
3. There were numerous oil and grease stains on the pavement through-out your facility. There needs to be better housekeeping at the site in order to prevent and absorb spills. Spill kits should be located through-out the facility at loading/unloading areas and transfer stations.
4. Recycled material was stored in standing storm water. It is recommended to direct the storm water away from products and materials.
5. Please submit an electronic copy of your spill prevention, control and countermeasure plan and storm water pollution prevention plan. The plans should be reviewed annually or after there is a change in management. The plans should also be updated to address the issues listed above.



Mike Murphy  
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If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3851.

Sincerely,



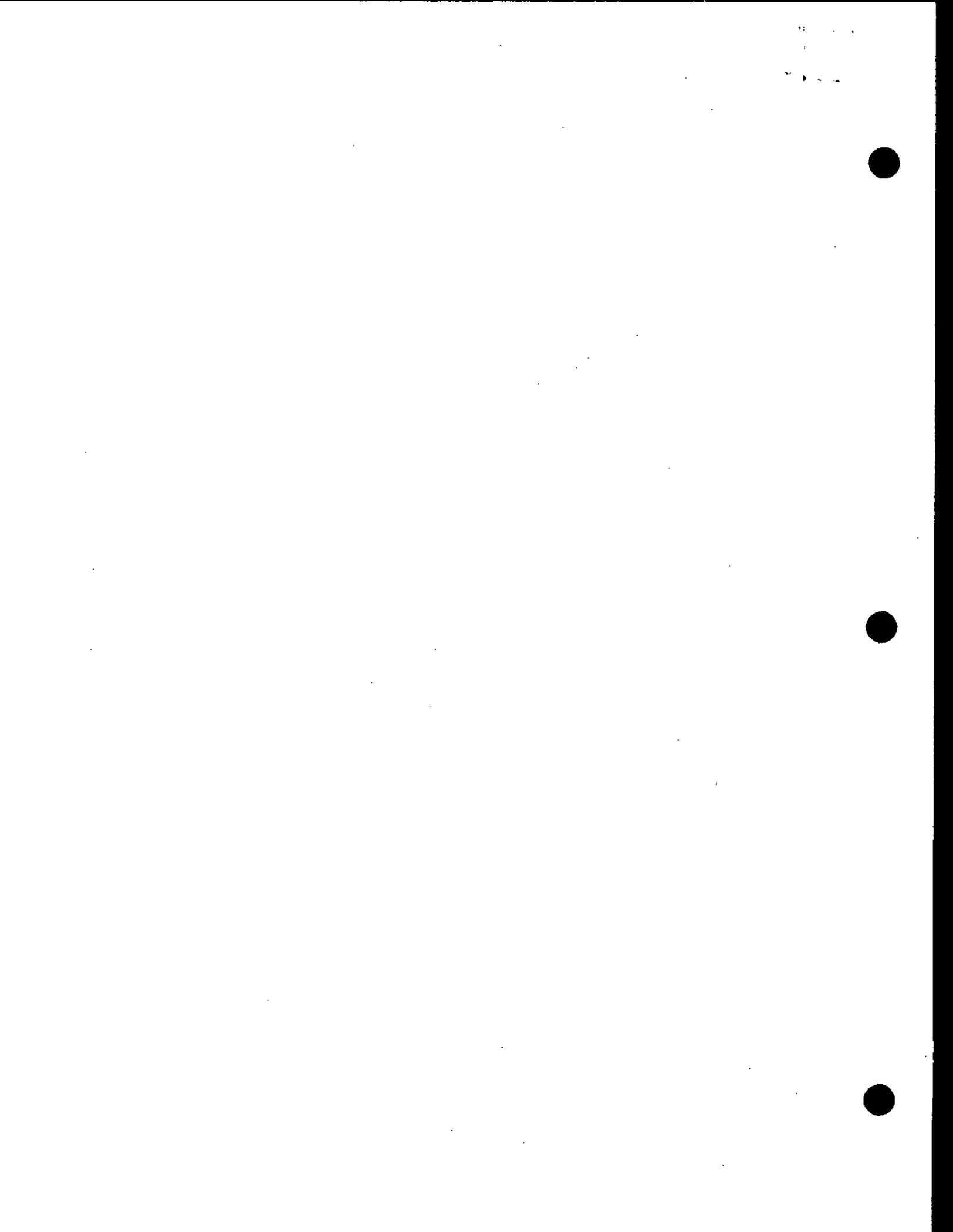
Gregory L. Sanders  
Environmental Specialist  
Division of Surface Water  
Central District Office

Enclosures

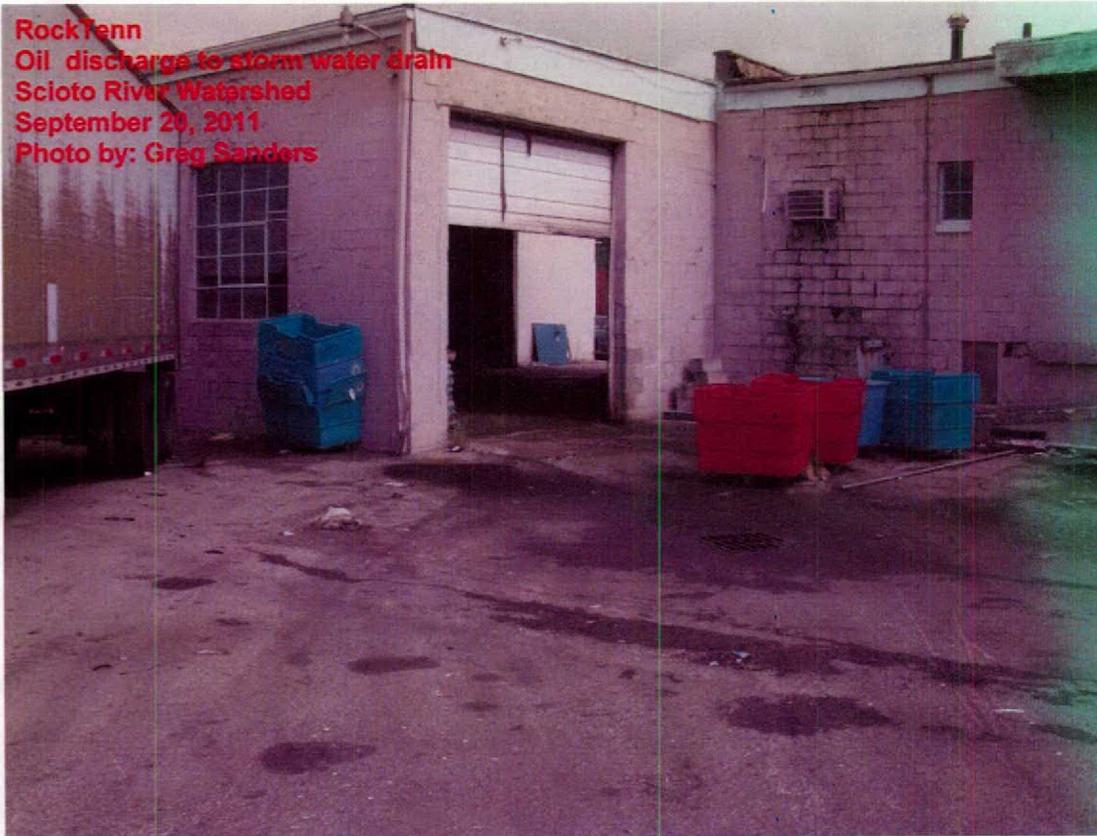
c: Jeff Bohne, DSW/CDO  
Brent Smith, City of Columbus, Pretreatment Group

ec: Greg Sanders, DSW/CDO

GS/nsm RockTenn., September 20, 2011



RockTenn  
Oil discharge to storm water drain  
Scioto River Watershed  
September 20, 2011  
Photo by: Greg Sanders

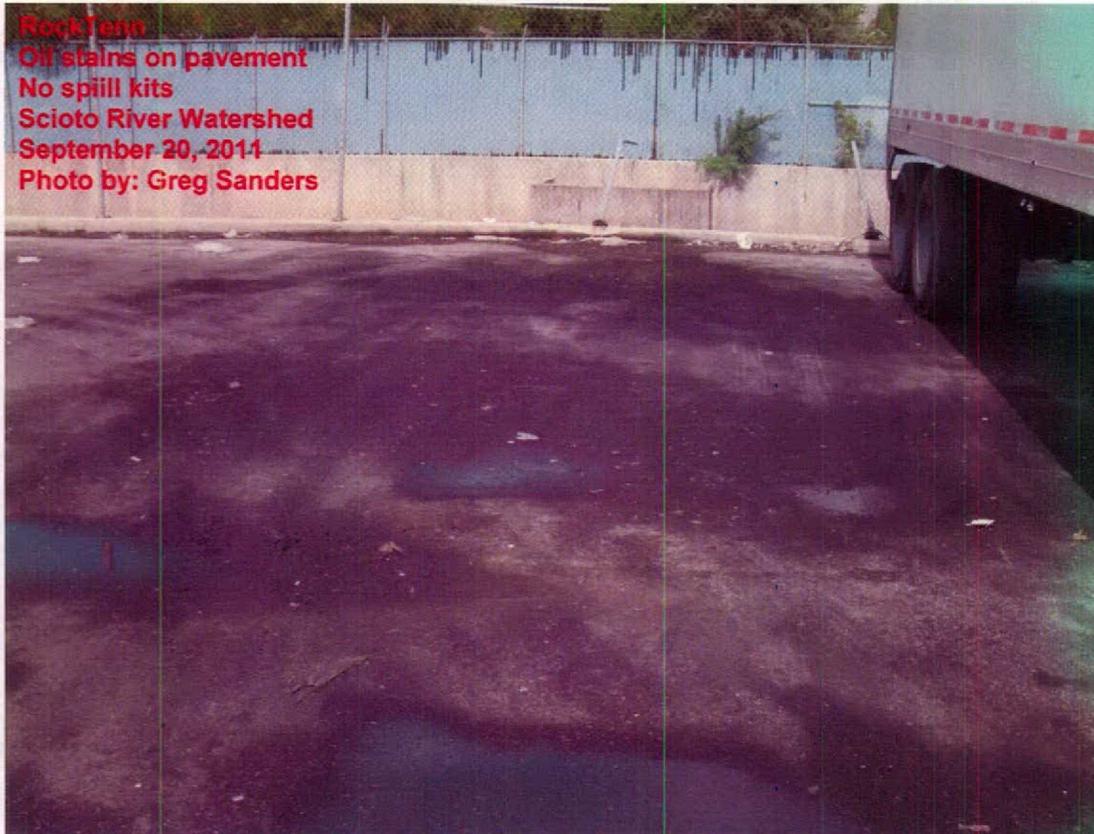


RockTenn  
Oil discharge to storm water drain  
Scioto River Watershed  
September 20, 2011  
Photo by: Greg Sanders





RockTenn  
Oil stains on pavement  
No spill kits  
Scioto River Watershed  
September 20, 2011  
Photo by: Greg Sanders



RockTenn  
Metal screen on storm basin outlet  
Scioto River Watershed  
September 20, 2011  
Photo by: Greg Sanders

