



Environmental
Protection Agency

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

March 24, 2011

Patrick Brooks, P.E.
United McGill Corporation
1777 Refugee Road
Columbus, OH 43207

**Re: No Exposure Inspection Verification, Permit Number 4GRN00287*DG
United McGill Corporation**

Dear Mr. Nespeca:

This letter is written regarding a follow-up storm water investigation I conducted at your facility on March 21, 2011. The purpose of the inspection was to verify compliance with your No-Exposure Exemption (NOE) in accordance with Ohio EPA's Storm Water Program.

This facility is required to seek storm water permit coverage, from Ohio EPA in accordance with 40 CFR 122.26, authorizing storm water discharges or obtain a NOE. The permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP mandates specific storm water practices, which minimize storm water contamination, associated with external operations or exposed materials.

It is my understanding; you have submitted and obtained a No-Exposure Exemption for this facility as you claim there are no activities or exposed materials, which pose a threat to storm water. This inspection was conducted to ensure your NOE is valid.

Based on my observations, I noted the following:

- The full barrels which were stored outside without containment and a roof were removed.
- The dumpsters now have lids and/or the lids were now closed.
- There were still drums, fuel tanks and other fluids stored under roof but without secondary containment. The storage area was located up slope of a storm water drain. The concrete outside the storage area had been stained with fuel and oil. There was no spill kit located in the area. Please install secondary containment around this area. It may be also necessary to install secondary containment for loading/unloading. Please see attached pictures.

- I noticed grating with a small catch pan in the rear of building #2, not far from the drum/fuel storage area. The grating was located near a storm water ditch. The catch pan had an oily residue and it was very possible that it could overflow and discharge to the storm water ditch. Please state the use of this grating and catch pan system. Please install controls to prevent the catch pan from overflowing from storm water and discharging into the storm water ditch. Please see attached pictures.

The last two items would invalidate your NOE. As a result, you must address the above items to be in compliance with your NOE within 30 days from the receipt of this letter. If the above items are not addressed within 30 days, you must submit a Notice of Intent (NOI) application and develop and implement a SWPPP. Additional information regarding the Industrial Storm Water Permit and application can be found at the following address:
http://www.epa.state.oh.us/dsw/storm/industrial_index.aspx

At this time, I am formally requesting a response regarding the corrective actions necessary to address items which would nullify your exemption stated in the paragraph above. 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

Enclosure

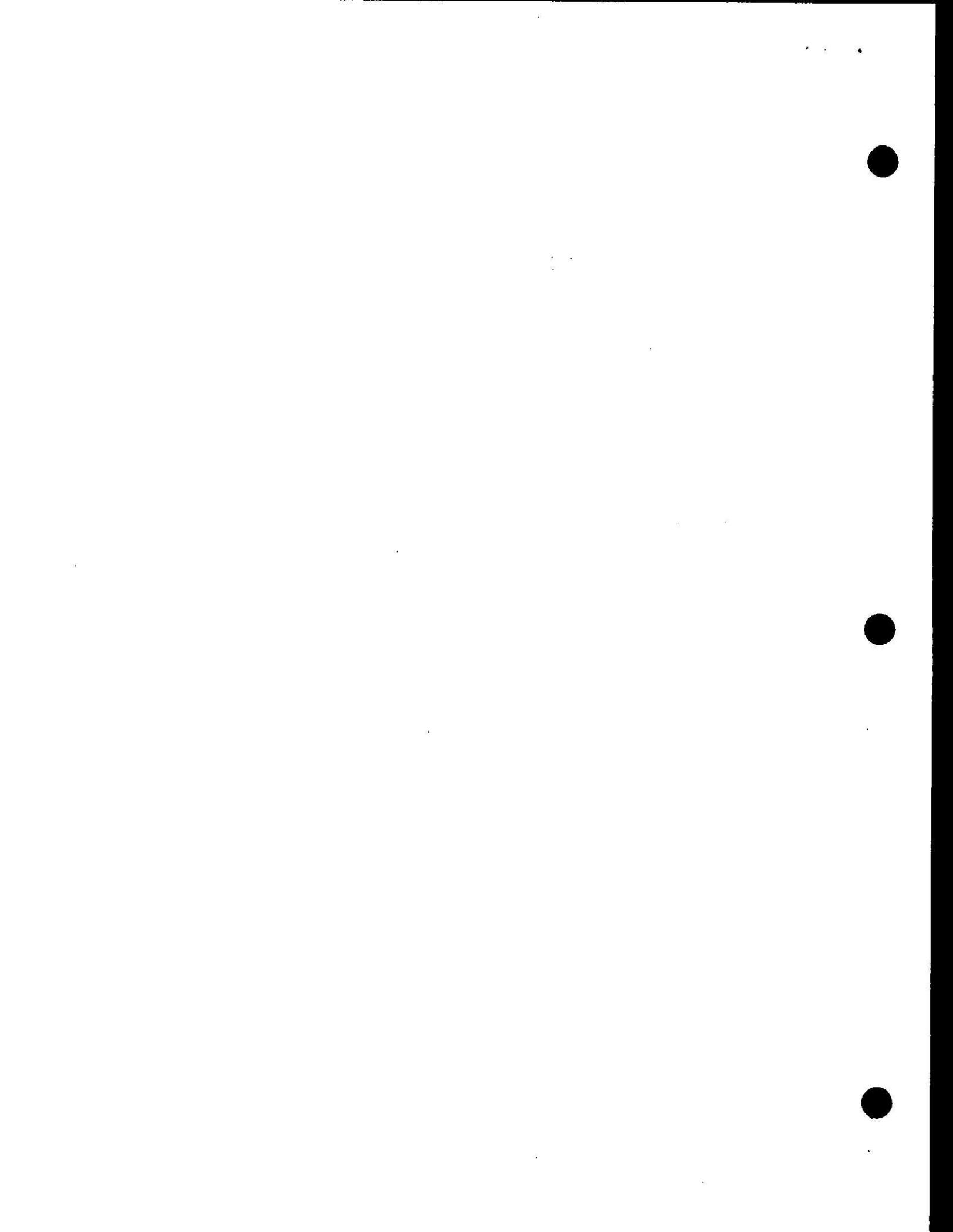
c: Jeff Bohne, DSW/CDO
Scott Shields, City of Columbus
Nick Nespeca, United McGill Corporation



United McGill
Grating in rear of
property w/city residue
Scioto River Watershed
March 21, 2011
Photo by: Greg Sanders



United McGill
Grating in rear of
property w/city residue
Scioto River Watershed
March 21, 2011
Photo by: Greg Sanders



United McGill
Chemicals & fluids stored w/o
containment upstream of SW drain
Scioto River Watershed
March 21, 2011
Photo by: Greg Sanders



United McGill
Chemicals & fluids stored w/o
containment upstream of SW drain
Note staining on concrete & no spill kit
Scioto River Watershed
March 21, 2011
Photo by: Greg Sanders



