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carboline
A Total Quality Company

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OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

November 2, 1994

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Kevin M. Pierard, Chief
United States Environmental Protection Agency
Region V
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Visual Site Inspection -- Carboline Company
Xenia, Ohio
OHD 030 963 615

Dear Mr. Pierard:

Although it has been some time since May 7, 1992, when EPA conducted an initial site inspection at Carboline's Xenia facility, I would like to take this opportunity to correct and update some of the information contained in EPA's Preliminary Assessment/Visual Site Inspection Final Report ("Report") dated November 6, 1992. In this way, EPA will have a more complete picture of the Xenia facility and Carboline's activities there.

PAGE 5

I have enclosed a corrected facility layout diagram, which was Figure 2 on page 5 of the Report. In the diagram that is currently in the Report, the spent solvent tank and the NPDES outfall were incorrectly located. On the enclosed diagram, I have indicated the actual locations of the tank and outfall. I have also added the location of the new containments and some other changes that have occurred at the facility since EPA's visual site inspection (see discussion below).

STL-209643.1

PAGE 7

The first few lines of paragraph 3 on page 7 of the Report are inaccurate. As the thinners become spent, they are pumped into the F-Waste Storage Tank (shown as #4 on the enclosed diagram) and sent off-site to be burned as a supplemental fuel. These spent thinners are ***not*** placed in 55-gallon drums. However, the sludge from the Kettle Washer is transferred to 55-gallon drums which are then emptied into the F-Waste Storage Tank in the Hazardous Waste Storage Area (#4 on the enclosed diagram).

In paragraph 5 on page 7 of the Report, the use of the back pad in incorrectly described. The back pad is used to store finished goods during Carboline's peak inventory periods. It is not used to store off-specification paint. [This error is repeated on page 18 of the Report.]

PAGE 9

On page 9 of the Report, in the third paragraph under the heading "History of Documented Releases," the identity of the material spilled in August 1991 is incorrect. The material spilled at that time was butyl cellosolve, not methanol. [This same error is also made in paragraph 2 on page 19 of the Report.] Also, the Report incorrectly states that the storm drains are part of the facility's NPDES permit; this is not the case. Furthermore, although only two Areas of Concern ("AOCs") are identified in the Report, references to "AOC 3" are made in the third and fourth paragraphs of this section of the Report.

In the fifth paragraph on page 9 of the Report, the facility representative reportedly stated that each of the two releases of materials to Shawnee Creek killed many fish. This statement is incorrect. The first release killed only seven (7) fish. The second release killed several fish. Additionally, OEPA ***was*** aware of the investigation Carboline conducted of the creek, contrary to the statement contained in this paragraph. In fact, an Emergency Response Special Investigator from OEPA's Division of Emergency Remedial Response was involved as of the date of the spill. OEPA determined the parameters for and approved the results of the investigation (a release letter was issued by OEPA on September 1, 1992, and a copy was sent to U.S. EPA on September 14, 1992). The facility has documentation of OEPA's participation and approval in its files. However, during the May 1992 Visual Site Inspection, the inspector did not ask to review Carboline's files on this matter.

PAGE 10

In the fourth paragraph on page 10 of the Report, the Report states that there was no documentation maintained in Carboline's files regarding its response to alleged RCRA violations in the 1980s. That is not the case. Ohio EPA conducted several interim status inspections from 1982 to 1984. The facility has files containing documentation of those inspections, the findings from the inspections, and Carboline's responses to the inspections. However, during EPA's May 1992 visual site inspection, the inspector did not ask to see Carboline's files.

PAGE 11

On page 11 of the Report, the first few lines state that: (1) Carboline has not filed an NPDES permit application since expiration of a permit in 1986; (2) Carboline does not maintain any monitoring records; and (3) unpermitted releases to Shawnee Creek have occurred via an NPDES outfall. These statements are inaccurate. Carboline submitted NPDES application forms (3510-2C) to Ohio EPA on June 10, 1986. On February 5, 1987, Ohio EPA asked Carboline to perform a one-time test of the storm water; this was done and the results were forwarded to Ohio EPA on July 9, 1987. When Carboline did not receive any response, Ohio EPA was contacted and the NPDES permit issue was discussed with Rick Magna on August 28, 1989. Mr. Magna informed Carboline that it had satisfied its obligations and that the burden was on Ohio EPA to issue a permit. He instructed Carboline to operate under its last NPDES permit, which Carboline has done.

In addition, Carboline has been conducting water monitoring, and submitting the results of the monitoring to Ohio EPA in Columbus, Ohio, for at least ten years. Although those records were available at the Xenia facility, the EPA inspector in May 1992 did not ask to see those records.

Finally, to Carboline's knowledge, there have been no unpermitted releases to Shawnee Creek via an NPDES outfall. The releases described in the Report reached Shawnee Creek via storm drains, not an NPDES outfall.

[The above-described inaccuracies regarding Carboline's NPDES permit, monitoring records and unpermitted releases are repeated on page 20 of the Report.]

PAGE 13

On paragraph 2 on page 13 of the Report, there is an error regarding the property located to the east side of the Carboline facility. Saint Brigid School is located to the West, not east, of the facility at a distance of approximately 1/4 mile. To the east is a small business, Greene Inc.

PAGE 18

In paragraphs 1 and 4 of page 18 of the Report, the description of Carboline's use of the back pad is inaccurate. See the above discussion of page 7 regarding the actual use of the back pad.

PAGE 19

In the first paragraph of the discussion of Carboline's solvent blending tank on page 19, the dimensions of the concrete dike are inaccurate. The dike is actually 18 inches high, not eight inches.

In the second paragraph, the material spilled is incorrectly identified. See the above discussion of page 9 regarding this spill.

PAGE 20

On page 20, the discussion of the NPDES outfall is inaccurate. See the above discussion of page 11 regarding the status of Carboline's NPDES permit, monitoring records and releases.

In addition, the outfall covered in Carboline's NPDES permit is non-contact cooling water that is pumped from the well indicated as the "Production Well" in the facility layout diagram (i.e. Figure 2 of the Report) and emitted from a series of settling pits that are part of NPDES permit no. F106*CD-OH0031461.

UPDATES

Subsequent to the May 1992 inspection, Carboline has made numerous improvements to the Xenia plant. I feel it is important that EPA be aware of these improvements, especially as evidence of Carboline's commitment to compliance and the environment. The

changes are reflected on the enclosed, corrected facility layout diagram. First containment has been added at several locations at the facility:

- Tote tank unloading and pumping station,
- Resin tank unloading,
- Solvent tank unloading, and
- Spent solvent and paint waste loading.

Second, the facility decommissioned SWMU #2, the hazardous waste storage area, and disposed of SWMU #3, the D-waste storage tank. A contained hazardous waste storage area and a contained D-waste storage tank have been added.

Third, the old storm drain has been closed and a new storm drain with a shutoff valve has been installed.

Fourth, the back pad has been cleared of all finished goods storage.

These actions have occurred since the May 1992 inspection and required significant expenditures by Carboline.

CONCLUSION

It is our understanding that changes to reflect the above information will not be made to the Report, but that this letter can be attached to the Report so that whomever receives or reviews the Report will also receive or be able to review this letter. Thus, Carboline requests that this letter be attached to the Report and that the information in this letter be considered before EPA takes any further action with respect to the Report or EPA's visual site inspection of the Xenia facility.

In addition, Carboline understands that based upon the Report, the Xenia facility has received a "medium" National Corrective Action Prioritization System ("NCAPS") ranking. In light of the above information, Carboline requests that its NCAPS ranking be modified to reflect the reduced hazard present at the Xenia facility.

I would be happy to discuss the contents of this letter with you or members of your staff if there are any questions. Thank you.

Sincerely,

Thomas W. Higgins
Environmental Health and Safety Manager

Encl.

cc w/encl.: Judith Allen Hellman
Vice President of Corporate Services

Cathleen S. Bumb, Esq.

UPDATES TO FACILITY

LEGEND FOR FIGURE 2

a. Containment for tote tank unloading and pumping station

b. Containment for resin tanker unloading

c. Containment for solvent tanker unloading

d. Containment for spent solvent and paint waste loading

e. Decommissioned SWMU #2, hazardous waste storage area

f. Disposed of SWMU #3, D-waste storage tank

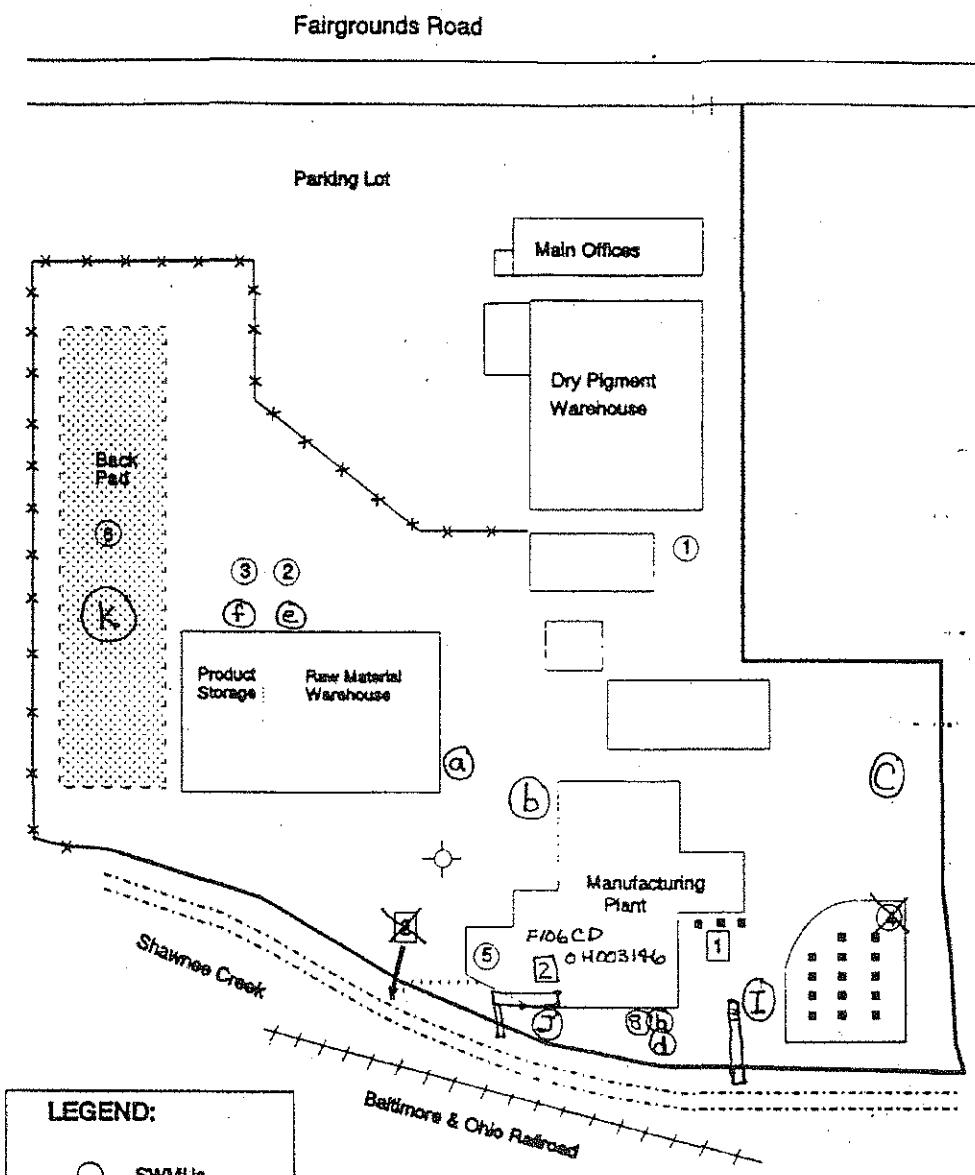
g. New contained D-waste storage tank

h. New contained hazardous waste storage area

i. New storm drain with shutoff valve

j. Closed old storm drain

k. Cleared finished goods storage on back pad



LEGEND:

- SWMUs
- AOCs
- Production Well
- Fence
- Outfall
- Railroad

Solid Waste Management Units

1. Baghouse
2. Hazardous Waste Storage Area
3. D-Waste Storage Tank
4. F-Waste Storage Tank (h)
5. Kettle Cleaning Area
6. Back Pad

Areas of Concern

1. Solvent Blending Tanks
2. NPDES Outfall

35' 0' 35' 70'

SCALE: 1" = 70'

SOURCE: Modified from Carboline Company, 1992

CARBOLINE COMPANY
XENIA, OHIO

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC