UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 12 2015

CERTIFIED MAIL 7010 1060 0002 1703 9195
RETURN RECEIPT REQUESTED

Mr. Jay Zimmerman
Acting Director, Division of Water Resources
North Carolina Department of Environment
and Natural Resources
1611 Mail Service Center
Raleigh, North Carolina 27699-1611

Re: Notice of Violation No.: 309-2015-06
National Pollutant Discharge Elimination System Permit No.: NC0006351
Chemical Specialties, Inc. Waste Water Treatment Plant

Dear Mr. Zimmerman:

Pursuant to Section 309(a)(1) of the Clean Water Act, 33 U.S.C. § 1319(a)(1), the U. S. Environmental Protection Agency Region 4 has determined that Chemical Specialties, Inc. (CSI) is in violation of its National Pollutant Discharge Elimination System Permit No.: NC0006351 (Permit). Specifically, CSI's Waste Water Treatment Plant has violated effluent requirements for Total Zinc and non-receipt of Discharge Monitoring Reports. The EPA is simultaneously notifying CSI of these findings through the issuance of a Notice of Violation (NOV). A copy of the NOV is enclosed for your convenience and record.

If the State of North Carolina (State) commences appropriate action within 30 days of receipt of this letter to ensure that CSI achieves expeditious compliance with its Permit, additional involvement by the EPA may not be required. However, if the State does not take such action, the EPA may then take the necessary steps to require CSI to come into compliance. Please advise the EPA within 15 days of receipt of this letter of the action(s) you plan to take in this matter to ensure that CSI achieves expeditious compliance with its Permit requirements. If a formal enforcement action is taken, please provide a copy of the applicable documents for our records.

If you have questions regarding this NOV, please contact Mr. Maurice Horsey, of my staff, at (404) 562-9764 or via e-mail at Horsey.Maurice@epa.gov.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 12 2015

CERTIFIED MAIL 7010 1060 0002 1703 9201
RETURN RECEIPT REQUESTED

Mr. Dave Haley
SHE Manager
Chemical Specialties, Inc.
Corning Optical Fiber
P.O. Box 157
Harrisburg, North Carolina 28075

Re: Notice of Violation No.: 309-2015-06
Information Request pursuant to 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit No.: NC0006351
Chemical Specialties, Inc. Waste Water Treatment Plant

Dear Mr. Haley:

Pursuant to Section 309(a)(1) of the Clean Water Act (CWA), 33 U.S.C. §1319(a)(1), the U.S. Environmental Protection Agency Region 4 hereby notifies Chemical Specialties, Inc. (CSI) it has violated its National Pollutant Discharge Elimination System Permit No.: NC0006351 (Permit). Specifically, CSI has violated effluent requirements for the parameters and months listed in the Enclosure.

The EPA requests, pursuant to Section 308 of the CWA, 33 U.S.C. §1318, that CSI provide a written explanation of the reasons for each of the aforementioned violations, any other effluent violations that may have occurred from January 1, 2015, to the present, and provide a summary of actions taken or planned by CSI to correct the problems and prevent future violations. In instances where the actions are planned, please include a schedule for completing the actions.

All information submitted must be accompanied by the following certification signed by a responsible official:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure A.

CSI must submit this information within 30 days of receipt of this correspondence. The submittal must be addressed to:

Mr. Namon Mathews
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The State of North Carolina (State) is being concurrently notified of these findings. The EPA is coordinating with the State to ensure that timely and appropriate enforcement action is taken and compliance with the conditions of the Permit is achieved.

If these violations are not resolved in a timely or appropriate manner, and/or CSI fails to respond to the information request, the EPA may take enforcement action, which may include issuance of an administrative order, assessment of administrative penalties or initiation of a civil judicial action pursuant to Section 309 of the CWA, 33 U.S.C. §1319.

If you have questions regarding this notice and information request, please contact Mr. Namon Mathews, of my staff, at (404) 562-9777 or via e-mail at mathews.namon @epa.gov.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Mr. Jay Zimmerman
North Carolina Department of Environment and Natural Resources

DMR Effluent Violations and Nonreceipt

***** Region 4 Certified, Ver. 2.0, 10/14/2010 *****

1/1/2012 12:00:00 AM to 12/31/2014 12:00:00 AM

Permit NC0006351

Permit Name	Version Nmbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
Chemical Specialties LLC	0	Major	4/4/14	5/1/14	11/30/18

Version # 0

Outfall 001M

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	DAILY MX
Limit Value	
DMR Values	
5/31/14	Not Received
6/30/14	Not Received
7/31/14	Not Received
8/31/14	Not Received
9/30/14	Not Received
10/31/14	Not Received
11/30/14	Not Received

00400 pH / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Standard Units	Standard Units
Statistical Base	DAILY MN	DAILY MX
Limit Value	6	9
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

00530 Solids, total suspended / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	2	3
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

DMR Effluent Violations and Nonreceipt

***** Region 4 Certified, Ver. 2.0, 10/14/2010 *****

1/1/2012 12:00:00 AM to 12/31/2014 12:00:00 AM

Permit NC0006351

Version # 0

Outfall 001M

00610 Nitrogen, ammonia total [as N] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	2	3
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

01002 Arsenic, total [as As] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	.208	.416
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

01034 Chromium, total [as Cr] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	.104	.2
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

01042 Copper, total [as Cu] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	.06	.12
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

DMR Effluent Violations and Nonreceipt

***** Region 4 Certified, Ver. 2.0, 10/14/2010 *****

1/1/2012 12:00:00 AM to 12/31/2014 12:00:00 AM

Permit NC0006351

Version # 0

Outfall 001M

01051 Lead, total [as Pb] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	.01	.037
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

01067 Nickel, total [as Ni] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit	
Limit Unit Desc	Micrograms per Liter
Statistical Base	DAILY MX
Limit Value	
DMR Values	
5/31/14	Not Received
7/31/14	Not Received
8/31/14	Not Received
9/30/14	Not Received
10/31/14	Not Received
11/30/14	Not Received

01092 Zinc, total [as Zn] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	.313	.626
DMR Values		
5/31/14	.6681	1.043
6/30/14	.7745	.78
9/30/14	.3351	
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

DMR Effluent Violations and Nonreceipt

***** Region 4 Certified, Ver. 2.0, 10/14/2010 *****

1/1/2012 12:00:00 AM to 12/31/2014 12:00:00 AM

Permit NC0006351

Version # 0

Outfall 001M

01147 Selenium, total [as Se] / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	30DA AVG	DAILY MX
Limit Value	.208	.416
DMR Values		
10/31/14	Not Received	Not Received
11/30/14	Not Received	Not Received

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 9 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
5/1/14	11/30/18		

Limit	
Limit Unit Desc	Million Gallons per Day
Statistical Base	30DA AVG
Limit Value	.025
DMR Values	
10/31/14	Not Received
11/30/14	Not Received