



REGION 3

PHILADELPHIA, PA 19103

June 4, 2024

VIA Electronic Mail

Chad Whalen
Senior Vice President, Chief Legal Officer and Secretary
Calgon Carbon Corporation
3000 GSK Drive
Moon Township, Pennsylvania 15108
chad.whelen@kuraray.com

Re: Supplemental Information Request pursuant to Section 308 of the Clean Water Act and Section 3007 of the Resource Conservation and Recovery Act; Request for Self-Monitoring pursuant to Section 308 of the Clean Water Act ("Information Request")

Dear Mr. Whalen:

In 2022, the U.S. Environmental Protection Agency ("EPA") conducted two inspections at Calgon Carbon Corporation's ("Calgon's") facilities located on Neville Island in Pittsburgh, Pennsylvania 15225, which included:

- From September 12 to 14, 2022, the EPA conducted an inspection at Calgon's Main Plant pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.* The EPA provided Calgon with a copy of its RCRA Inspection Report on March 1, 2023.
- From November 29 to December 1, 2022, EPA conducted an inspection at Calgon's Main and West Plants pursuant to the Clean Water Act ("CWA"), 33 U.S.C. § 1318. The EPA provided Calgon with a copy of its CWA Inspection Report on September 14, 2023.

During the CWA inspection, the EPA collected water samples on November 30, 2022, and collected surface soil and solids samples on December 1, 2022. These samples were analyzed for 1) a list of targeted per- and polyfluoroalkyl substance(s) (or "PFAS") analytes and 2) metals per Table 7 of the CWA Inspection Report at the locations specified in Table 8 of the CWA Inspection Report. The results of EPA's sampling are contained in Appendix M of the CWA Inspection Report.

The EPA previously sent information requests to Calgon on February 22, 2022, June 29, 2022, and April 13, 2023. The EPA is now seeking additional information through this supplemental information request, pursuant to both Section 308 of the CWA, 33 U.S.C. § 1318 and Section 3007 of RCRA, 42 U.S.C. § 6927. In addition, the EPA is requesting that Calgon conduct monitoring of wastewater and stormwater discharges at its Main and West Plants pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, which authorizes EPA to require persons subject to the CWA to furnish information, conduct monitoring, provide entry to the Administrator or authorized representatives, and make reports as may be necessary to carry out the objectives of the CWA.

The EPA requests that Calgon provide the information specified in the attached Enclosures within 45 days of receiving this e-mail, as well as monitoring results every other month for a 24-month period beginning in July 2024 as described more fully in Enclosure B.

Failure to comply with or respond adequately to an information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319 and Section 3008 of RCRA, 42 U.S.C. § 6928, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide in response to this Information Request may be used by EPA in administrative, civil or criminal proceedings.

Calgon cannot withhold from EPA what it may consider to be confidential business information. However, Calgon has the discretion to assert, at the time of submission, a claim of business confidentiality for part or all of the requested information by following the requirements at 40 C.F.R. § 2.203(b). EPA will not disclose any information covered by such a claim except as authorized by 40 C.F.R. Part 2, Subpart B. If no claim of business confidentiality is received with Calgon's submission, EPA may make the information available to the public without further notice. All confidentiality claims are subject to EPA verification. If Calgon claims confidential business information for all or part of its response to this Information Request, then Calgon is required to follow the procedures outlined in the instructions set forth in Enclosure A.

Please send Calgon's response, to:

Aviva Reinfeld
Office of Regional Counsel
EPA Region 3
reinfeld.aviva@epa.gov

and

R3_ORC_mailbox@epa.gov

[sent with subject line attn: Aviva Reinfeld, Calgon IRL]

Please direct any questions to Aviva Reinfeld, Assistant Regional Counsel, at reinfeld.aviva@epa.gov or (215) 814-2632. Thank you for your attention to this matter.

Sincerely,

Karen Melvin
Director
Enforcement and Compliance Assurance Division

Enclosures

Cc: Laura Welles, EPA HQ (welles.laura@epa.gov)
Stacey Greenwald, PADEP (sgreenwald@pa.gov)
Melissa Gross, PADEP (melgross@pa.gov)

Enclosure A: Instructions and Definitions

I. Instructions

1. Your response to the Information Request Questions must be provided to the EPA within forty-five calendar days of receipt of this email.
2. Identify the person to contact regarding your response, including title, address, and phone number.
3. Identify the person(s) responding to each question in this Information Request.
4. Number each answer with the corresponding number of the question.
5. Respond to all questions using the following native electronic formats, as appropriate: MS Word Document, MS Excel Spreadsheet, MS Access Database, Geographic Information System (GIS) data, Adobe Acrobat Reader PDF format, or pictures and images in JPEG format.
6. If information is not known or not available to you as of the date of submission of a response to this Information Request and should later become known or available to you, you must supplement your response to the EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA thereof as soon as possible.
7. Provide all information in your possession that is responsive to this Information Request, regardless of whether the response relates to your activities or the activities of another entity.
8. Preserve, until further notice, all records (either written or electronic), which exist at the time of receipt of this Information Request that relate to any of the matters set forth in this request. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this Information Request shall include assurance that these record protection provisions were put into place, as required. No such records shall be disposed of until written authorization is received from the EPA.
9. If information responsive to this Information Request is not in your possession, custody, or control, then identify the person(s) from whom such information may be obtained.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional

responsive documents, identify such persons and the additional information or documents that they may have.

11. If any question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.
12. The following certification must accompany each submission pursuant to this request and must be signed by a representative authorized to respond on behalf of Respondent:

“I certify that the information contained in or accompanying this submission is true, accurate, and complete. As to the identified portion(s) of this submission for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my direct instructions, made the verification, that this information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.”

Signed: _____

Title: _____

Date: _____

13. Confidential Business Information. You should provide the information requested even if you consider it confidential information or trade secrets. You may assert a business confidentiality claim for part or all of the information requested, as described below and set forth in 40 C.F.R. Part 2, Subpart B. You may assert a business confidentiality claim covering all or part of the information you provide in response to this Information Request for any business information entitled to confidential treatment under Section 308(b) of the CWA, 33 U.S.C. § 1318(b), Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. Part 2, subpart B. Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 308(b) of the CWA, and 40 C.F.R. Part 2, Subpart B. The EPA will construe your failure to furnish a business confidentiality claim with your response to this Information Request as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this Information Request. Allegedly confidential portions of otherwise non-

confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event. The EPA will ask you to substantiate each claim of confidential business information by separate letter in accordance with applicable EPA regulations, 40 C.F.R. Part 2, Subpart B.

II. Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the CWA or RCRA and its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
3. The term “AP Forms” refers to the adsorbate profile forms that Calgon issues to customers seeking information on the treatment process application, chemical composition, sampling information, and hazardous waste characterization of the customer’s used GAC. The forms are updated annually for hazardous used GAC, and every five years for non-hazardous used GAC.
4. The term “Calgon” shall mean Calgon Carbon Corporation and any successors or assigns.
5. The term “CWA Inspection” refers to an inspection conducted by EPA from November 29 to December 1, 2022 pursuant to the Clean Water Act. EPA sent Calgon an Inspection Report based on this inspection on September 14, 2023 (“CWA Inspection Report”).
6. The term “discharge” or “discharge of pollutants” shall mean any action within the meaning of these terms, as defined at Section 502 of the CWA, 33 U.S.C. § 1362, and all regulations promulgated thereunder.
7. “Document” includes any writings, drawings, graphs, maps, charts, photographs, phone records, field records, operation logs/notes/field rounds sheets, electronic mail, facsimile, supervisory control and data acquisition (SCADA) information, and other data compilations from which information can be obtained, translated if necessary, through detection devices into reasonably usable form. Documents should be produced as they are kept in the usual course of business.
8. The term “GAC” shall mean granulated activated carbon or used granulated activated carbon.

9. The term “Main Plant” shall mean Calgon’s facility located at 200 Neville Road, Pittsburgh, Pennsylvania 15225.
10. The term “Non-Targeted Analysis” shall mean: methods that use high resolution mass spectrometry (HRMS) capable of identifying all known and unknown analytes in a sample. In order to identify unknown compounds, liquid chromatography/tandem mass spectrometry (LC/MS/MS) analyses are applied and followed by quantification if an adequate standard exists. Otherwise, semi-quantitation may be possible based on known, structurally similar analytes. These methods can screen for lists of known suspects and can discover new or unknown analytes. HRMS data can be stored and analyzed later for newly identified analytes. See <https://www.epa.gov/water-research/pfas-analytical-methods-development-and-sampling-research>.
11. The term “NPDES Permit” refers to either or both National Pollutant Discharge Elimination System Permits issued to Calgon’s Main Plant (NPDES Permit No. PA0091227) and Calgon’s West Plant (NPDES Permit No. PA0204030).
12. The term “PFAS” shall mean per- and polyfluoroalkyl substance(s) where perfluorinated substances are defined as chemicals of which one or more carbon atoms are fully fluorinated carbon atoms and where polyfluoroalkyl substances are defined as chemicals containing a mix of fully fluorinated carbon atoms, partially fluorinated carbon atoms, and/or nonfluorinated carbon atoms.
13. The term “RCRA Inspection” refers to an inspection conducted by EPA from September 12 to 14, 2022 pursuant to the Resource Conservation and Recovery Act. EPA sent Calgon an Inspection Report based on this inspection on March 1, 2023 (“RCRA Inspection Report”).
14. The term “RCRA Permit” refers to Calgon’s RCRA Permit (# PAD000736942) that was issued in June 2008 and modified by PADEP in August 2016.
15. The term “Targeted Analysis” shall mean methods that are applicable to a specific defined set of known analytes. Analytical standards exist for quantitation and methods only measure for analytes on the targeted list. See <https://www.epa.gov/water-research/pfas-analytical-methods-development-and-sampling-research>.
16. The term “West Plant” shall mean Calgon’s facility located at 4301 Grand Avenue, Pittsburgh, Pennsylvania 15225.
17. The term “you” and “your” shall mean Calgon and/or any of its agents, employees or contractors, and/or any company, entity, or corporation that has directed work by or for Calgon.

Enclosure B:
Information Request Questions

1. Calgon provided a written response to EPA's CWA Inspection Report on October 22, 2023. If any of the information you provided in the October 22, 2023 response to the September 14, 2023 Inspection Report has changed, or warrants clarifications, please provide any corrections, changes, or clarifications to your October 22 responses.
2. If you have taken any additional steps to come into CWA and RCRA compliance that you have not already identified to EPA, please provide a description of those efforts.
3. Following the RCRA Inspection, Calgon provided EPA with a diagram, attached hereto as Enclosure C, that shows a "Process Water Flow & Filtration" or "Water Filtration" system at the Main Plant that includes a Filtration Tank (T-700), Tank T-730, and the ARCO Tank (T-740). Please provide the daily tank levels or inventories for each of these three tanks for the past two years.
4. Following the RCRA Inspection, Calgon provided a photograph to EPA showing that a cap had been replaced on the open sample port that was identified as leaking (see Area of Concern #3 of the RCRA Inspection Report). Please provide all documentation, including photographs and description of work performed with a timeline relating to the damaged ductwork identified in Photo #12 of the RCRA Inspection report.
5. In response to Question #2 of EPA's April 13, 2023 Information Request, Calgon provided information to EPA that the company had hired a third party to evaluate and repair the cracks in the secondary containment floor observed by EPA at the Main Plant during the RCRA Inspection. Please provide date-stamped photographs of the secondary containment work performed by the third-party contractor.
6. During the RCRA Inspection, the EPA inspectors reviewed a copy of the weekly inspection log for 5/17/2022, which had indicated that a container of abatement dust was split open and stated: "1 box needs replaced (busted)!" The weekly inspection log identified the container as #271. The weekly inspection log for the week of 5/24/2022 had indicated that the same container of abatement dust was still split open and stated: "still a box split open." Please provide:
 - a. A detailed description for the content of the container; and
 - b. Documentation of a "waste determination", if one was performed, for the content of the container. If the content in the container was determined to be "hazardous waste" please provide the specific EPA Hazardous Waste Code(s) associated with the content of the container that was determined to be hazardous waste.

7. Please provide a detailed description of the process to dewater the used carbon slurry, including, the role of the Surge Tank (410) and the vibratory dewatering screen followed by a dewatering screw (referenced in the RCRA permit application drawings as DRAWING-09-00-9050.PDF & DRAWING-EF-5001.PDF).
8. Please provide the most recent AP Forms submitted by Calgon's customers in the past two years.
9. Please provide as-built drawings that identify the stormwater piping system and wastewater piping system for the West Plant.
10. If Calgon has received, processed or stored used GAC at the West Plant, please describe 1) when, and 2) the source(s) of the used GAC.
11. Please list all potential sources of PFAS compounds present at the West Plant.
12. **PFAS Monitoring Request:** Calgon shall characterize the nature of the stormwater runoff and effluent wastewater leaving the Main and West Plants by collecting and analyzing samples for PFAS, in accordance with the Stormwater Monitoring Requirements in Section III(F) of the NPDES Permits¹ of its stormwater and wastewater discharges at its Main and West Plants. Sample collection and analysis shall begin **every other month beginning in August 2024 for a 24-month period**, in accordance with the following requirements:
 - a. Sampling will take place at:
 - i. The Main Plant's permitted outfalls per NPDES Permit No. PA0091227 (Outfalls 001, 002, 005, 006, 007);
 - ii. Discharges authorized under the ALCOSAN pretreatment Permit No. P2-0128 for the Main Plant; and

¹ "3. The permittee shall collect all samples from discharges resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. The 72-hour storm interval is waived when the preceding storm did not yield a measurable discharge, or if the permittee is able to document that a less than 72-hour interval is representative for local storm events during the sample period.

4. The permittee shall collect all grab samples within the first 30 minutes of a discharge, unless the permittee determines that this is not possible, in which case grab samples must be collected as soon as possible after the first 30 minutes of a discharge. The permittee shall explain why samples could not be collected within the first 30 minutes of any discharge on the Annual Report required by paragraph B of this section.

5. The permittee shall collect stormwater samples at times when commingling with non-stormwater discharges is not occurring or at locations prior to the commingling of non-stormwater discharges, unless Part A of this permit recognizes commingling of stormwater and non-stormwater discharges."

- iii. The West Plant's permitted outfall per NPDES Permit No. PA0204030 (Outfall 001), and three stormwater discharge locations identified in EPA's Inspection Report in Photographs 76, 78 and 79 (enclosed herein for your reference in Enclosure D).
- b. The PFAS sampling should be conducted in accordance with 40 CFR Part 136 and analyzed by a certified lab or lab approved by EPA.
- c. Analysis of the PFAS samples should be performed as follows:
 - i. Targeted extended PFAS testing for all analytes that includes at least the 70 Analytes attached in Enclosure E;
 - ii. Adsorbable Organic Fluorine analysis using CWA Wastewater Method 1621; and
 - iii. A Non-Targeted Analysis.
- d. Bi-Monthly PFAS effluent monitoring reports shall be provided by e-mail within 60 calendar days of the date the sampling took place to:

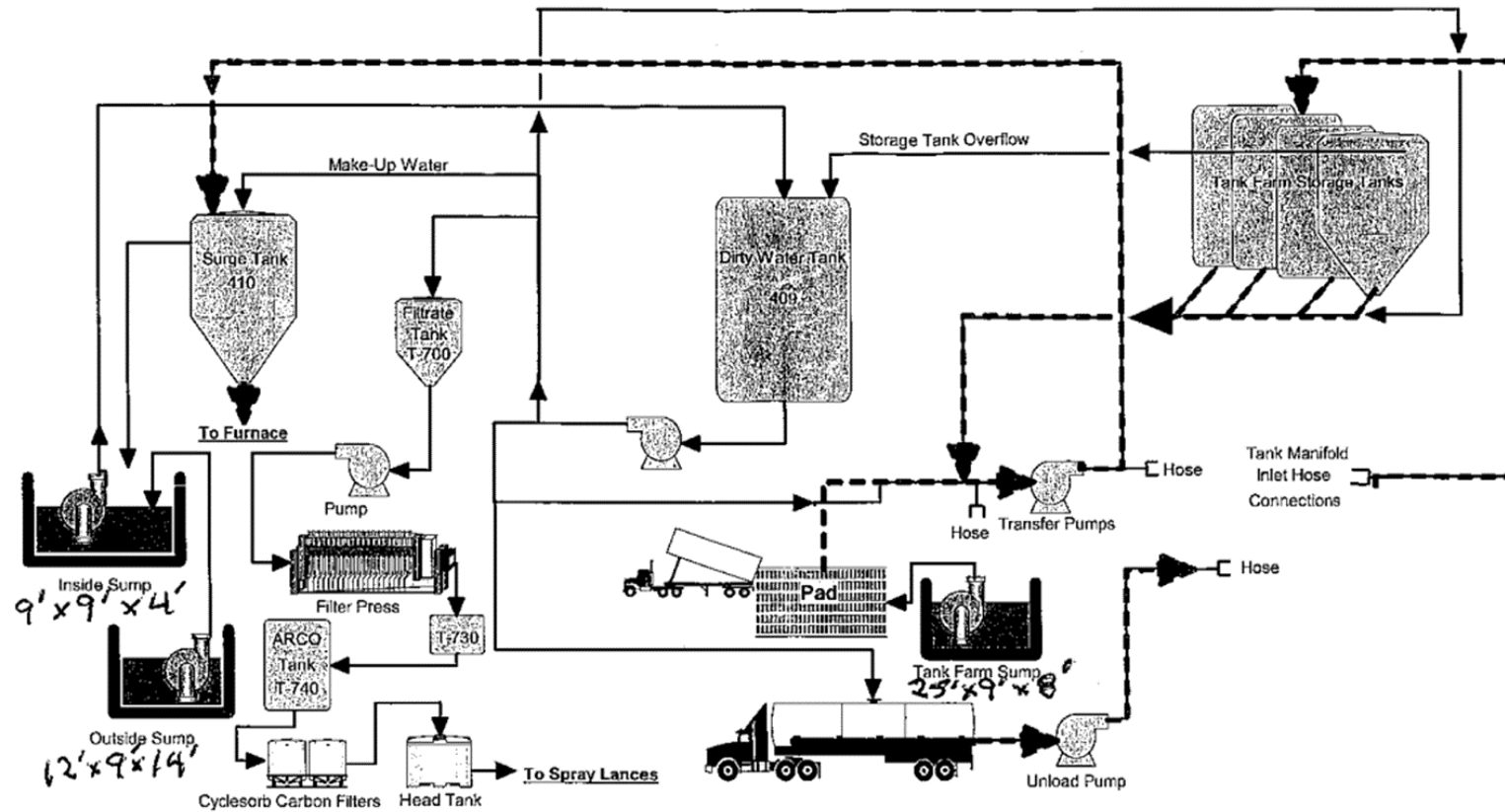
Chuck Schadel
Enforcement and Compliance Assurance Division
EPA Region 3
schadel.chuck@epa.gov

and

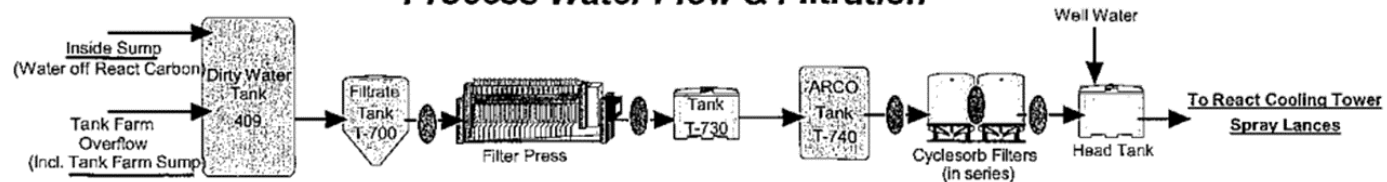
R3_ORC_mailbox@epa.gov

[sent with subject line attn: Aviva Reinfeld, Calgon IRL]

Enclosure C: Diagram of Tanks



Process Water Flow & Filtration



Enclosure D:

Sampling Locations at the West Plant

Sampling locations per Question 3(a)(iii): the West Plant's permitted outfall per NPDES Permit No. PA0204030 (Outfall 001), and three stormwater discharge locations identified in EPA's Inspection Report in Photographs 76, 78 and 79 reproduced below:



Photo 1. (DSCN5189) Plastic piping connected to multiple roof drains along the northeast side of the West Plant warehouse.



Photo 2. (DSCN5202) Plastic pipe connected to multiple roof drains on the north side of the warehouse. Stormwater was flowing from this pipe into a nearby storm drain on 11/30/2022. Sample SP-9 was taken at this location.



Photo 3. (DSCN5203) Loading dock on the east side of the West Plant warehouse, with stormwater flowing from a plastic pipe on 11/30/2022. Carbon accumulation was observed.

Enclosure E: List of Analytes

Analyte	CAS Number
Perfluorobutanoic acid (PFBA)	375-22-4
Perfluoropentanoic acid (PFPeA)	2706-90-3
Perfluorohexanoic acid (PFHxA)	307-24-4
Perfluoroheptanoic acid (PFHpA)	375-85-9
Perfluorooctanoic acid (PFOA)	335-67-1
Perfluorononanoic acid (PFNA)	375-95-1
Perfluorodecanoic acid (PFDA)	335-76-2
Perfluoroundecanoic acid (PFUnA)	2058-94-8
Perfluorododecanoic acid (PFDoA)	307-55-1
Perfluorotridecanoic acid (PFTriA)	72629-94-8
Perfluorotetradecanoic acid (PFTeA)	376-06-7
Perfluoro-n-hexadecanoic acid (PFHxDA)	67905-19-5
Perfluoro-n-octadecanoic acid (PFODA)	16517-11-6
Perfluorobutanesulfonic acid (PFBS)	375-73-5
Perfluoropentanesulfonic acid (PFPeS)	2706-91-4
Perfluorohexanesulfonic acid (PFHxS)	355-46-4
Perfluoroheptanesulfonic Acid (PFHpS)	375-92-8
Perfluorooctanesulfonic acid (PFOS)	1763-23-1
Perfluorononanesulfonic acid (PFNS)	68259-12-1
Perfluorodecanesulfonic acid (PFDS)	335-77-3
Perfluorododecanesulfonic acid (PFDoS)	79780-39-5
Perfluorooctanesulfonamide (FOSA)	754-91-6
NEtFOSA	4151-50-2
NMeFOSA	31506-32-8
NMeFOSAA	2355-31-9
NEtFOSAA	2991-50-6
NMeFOSE	24448-09-7
NEtFOSE	1691-99-2
4:2 FTS	757124-72-4
6:2 FTS	27619-97-2
8:2 FTS	39108-34-4
10:2 FTS	120226-60-0
4,8-Dioxa-3H-perfluorononanoic acid (DONA)	919005-14-4
HFPO-DA (GenX)	13252-13-6
F-53B Major	756426-58-1

F-53B Minor	763051-92-9
3:3 FTCA	356-02-5
5:3 FTCA	914637-49-3
7:3 FTCA	812-70-4
6:2 FTCA	53826-12-3
6:2 FTUCA	70887-88-6
8:2 FTCA	27854-31-5
8:2 FTUCA	70887-84-2
10:2 FTCA	53826-13-4
10:2 FTUCA	70887-94-4
PFECHS	133201-07-7
PFPrS	423-41-6
PFPrA	422-64-0
NFDHA	151772-58-6
PFMBA	863090-89-5
PFMPA	377-73-1
PFEESA	113507-82-7
PFMOAA	674-13-5
PFECA G	801212-59-9
PFO4DA	39492-90-5
PFO3OA	39492-89-2
PFO2HxA	39492-88-1
R-EVE	2416366-22-6
NVHOS	1132933-86-8
Hydro-EVE Acid	773804-62-9
EVE Acid	69087-46-3
PFO5DA	39492-91-6
PMPA	13140-29-9
PEPA	267239-61-2
MTP	93449-21-9
PS Acid	29311-67-9
Hydro-PS Acid	749836-20-2
R-PSDA	2416366-18-0
Hydrolyzed PSDA	2416366-19-1
R-PSDCA	2416366-21-5