



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 3, 2009

Re: Washington County
Kraton Polymers
Compliance Sampling Inspection
Correspondence (IWW)

Mr. Bob Roesch, Plant Manager
Kraton Polymers, U.S., LLC
2419 State Route 618
Belpre, Ohio 45714

Dear Mr. Roesch:

On February 23 and 24, 2009, a Compliance Sampling Inspection was conducted at Kraton Polymers' Belpre Plant. The purpose of the inspection was to determine Kraton's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Jim Fain and Eric Sims representing Kraton; John Lent representing Kemron; and Joann Montgomery and Stephen Wells representing Ohio EPA, Southeast District Office, Division of Surface Water. Wastewater samples were collected as part of the inspection. A copy of the analytical results and inspection report are attached.

As a result of the inspection, I have the following comments:

1. Kraton has begun construction of two projects for SPCC containment. These two projects consist of the rail car unloading area and Northside containment. These projects were both started on February 16, 2009.
2. Kraton is planning on starting to use Foamtrol AF3561 in the process water used at the facility. This product appears to be acceptable for use in the process.
3. On March 1, 2009, Kraton had a discharge of fuel oil from the No. 2 boiler to Outfall 001. The sheen was caused by uncombusted fuel from the No. 2 boiler due to a malfunction in fuel oil gun. Incomplete combusted fuel and proplets were discharged to the slag tank. The slag tank cooling water is discharged to Outfall 001 which the cooling water came into contact with uncombusted fuel oil causing the sheen. Numerous oil and grease samples were collected at Outfall 001 and at Davis Creek with only one result at being above non-detect. Ohio EPA has reviewed Kraton's follow-up and no further response is requested.

4. In December 2008 and January 2009, Kraton reported bypasses of treatment at the effluent treatment system. The December incident was the effluent equalization tank and the January incident was at the scum tank. Kraton has submitted follow-up reports for each of the bypasses. No further response is requested.
5. Outfall 003 was determined to be acutely toxic to Ceriodaphnia. The toxicity at Outfall 003 will need to be addressed. I know in the past, discussions were had over collecting a sample at the manhole where Outfall 001 and Outfall 003 combine before discharge to Davis Creek. Kraton may want to do toxicity sampling at this manhole to determine if the combined effluent is toxic. The toxicity issue will probably need to be addressed in the next NPDES Permit renewal.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

In conclusion, Kraton appeared to be in compliance with its NPDES Permit, except for the toxicity at Outfall 003 at the time of the inspection.

No further response to the above comments is requested at this time.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosures

- c: Jim Fain, Kraton Polymers
- c: Eric Sims, Kraton Polymers

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IF00008*KD	OH0007030	February 23-24, 2009	S	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Kraton Polymers, U.S., LLC Belpre Plant 2419 State Route 618 Belpre, Ohio 45714		August 1, 2006
	Exit Time	Permit Expiration Date
		December 30, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Erik Sims, Environmental Engineer Jim Fain, Health, Safety and Environmental Manager	(740) 423-2930 (740) 423-2278
Name, Address and Title of Responsible Official	Phone Number
Mr. Bob Roesch, Plant Manager Kraton Polymers, U.S., LLC 2419 State Route 618 Belpre, Ohio 45714	(740) 423-7571

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N/A</u> Sludge Storage/Disposal	<u> </u> Other
<u>N/A</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

6/3/09

Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

6/3/09

Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule		X		
d. Compliance schedule contained in: _____				
e. Permittee is meeting compliance schedule			X	

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed _____	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>2</u> Days/Week <u>7</u>				
e. Operator holds unexpired license of class required by permit Class: _____			X	
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection	X*			
j. Regulatory agency notified of bypasses: _____ on MORS <u>X</u> 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: * See attached letter.

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X N/A

	Yes	No	N/A	N/
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: <u>Landfill</u>)	X			
d. If sludge is incinerated, where is ash disposed of? _____			X	
e. Is sludge disposal contracted (Name: <u>Enviro-Tank Clean</u>)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/	N/
a. Primary flow measuring device properly operated & maintained. Type of device: _____ ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _____ ultrasonic & weir _____ <u>X</u> Specify: <u>*</u>				
b. Calibration frequency adequate (date of last calibration: <u>Feb. 16, 2009</u>)	X			
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: _____ <u>X</u> Daily _____ Weekly _____ Monthly _____ Other				

Comments: *Outfall 001: Calculated; Outfall 002: Parshall Flume with static gauge; Outfall 003: Parshall Flume

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments:

TABLE I

OHIO EPA FIELD DATA

FACILITY: Kraton Polymers, Washington County

DATES SAMPLED: February 23 & 24, 2009

<u>Station</u>	<u>Date</u>	<u>Time</u>	<u>Parameter</u>	<u>Units</u>	<u>Value</u>	<u>Permit Limits</u>
001	2/23	1320	pH	S.U.	7.37	6.0-9.0
			Temperature	°C	6.13	-
			Dissolved oxygen	mg/l	13.14	-
			Conductivity	umhos/cm	387	-
002	2/23	1402	pH	S.U.	7.01	6.5-9.0
			Temperature	°C	3.14	-
			Dissolved oxygen	mg/l	14.19	-
			Conductivity	umhos/cm	380	-
			Chlorine residual	mg/l	0.05	-
003	2/23	1230	pH	S.U.	8.13	6.0-9.0
			Temperature	°C	26.26	-
			Dissolved oxygen	mg/l	7.43	-
			Conductivity	umhos/cm	7051	-
004	2/23	1335	pH	S.U.	8.07	-
			Temperature	°C	4.11	-
			Dissolved oxygen	mg/l	13.06	-
			Conductivity	umhos/cm	779	-
001	2/24	1030	pH	S.U.	7.92	6.0-9.0
			Temperature	°C	6.01	-
			Dissolved oxygen	mg/l	13.85	-
			Conductivity	umhos/cm	463	-

(TABLE I, con't.- Kraton)

002	2/24	1012	pH	S.U.	7.46	6.5-9.0
			Temperature	°C	2.77	-
			Dissolved oxygen	mg/l	15.43	-
			Conductivity	umhos/cm	419	-
003	2/24	1110	pH	S.U.	7.75	6.0-9.0
			Temperature	°C	26.82	-
			Dissolved oxygen	mg/l	6.44	-
			Conductivity	umhos/cm	7876	-

TABLE II

COMPLIANCE SAMPLING DATA

FACILITY: Kraton Polymers, Washington County

DATES SAMPLED: February 23-24, 2009

STATION	T*	PARAMETER	UNITS	<u>OHIO EPA</u>		<u>ENTITY</u>		<u>PERMIT LIMITS</u>	
				CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.
001	G	Oil & Grease	mg/l	<2.0	-	<5	-	20	-
	G	COD	mg/l	<20	-	<20	-	-	-
	C	Susp. Solids	mg/l	12	-	14.5	-	50	-
	G	Chloroform ¹	ug/l	2.16	-	2.33	-	-	-
		Flow, total	MGD			12.4			

¹ All other organic parameters were below detection limits per OEPA test results

STATION	T*	PARAMETER	UNITS	<u>OHIO EPA</u>		<u>ENTITY</u>		<u>PERMIT LIMITS</u>	
				CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.
002	G	Oil & Grease	mg/l	<2.0	-	<5	-	-	-
	C	Zinc, total	ug/l	-	-	15.1	-	-	-
	C	Arsenic, total	ug/l	-	-	24.2	0.116	150	0.908
	C	Selenium, tot.	ug/l	-	-	3.57	-	-	-
	C	Susp. Solids	mg/l	-	-	22	-	100	-
		Flow, total	MGD			1.27			

Sampler froze; minimal sample collected in composite sampler. Composite sample was not split.

(Table II, con't-Kraton)

STATION	T*	PARAMETER	UNITS	<u>OHIO EPA</u>		<u>ENTITY</u>		<u>PERMIT LIMITS</u>	
				CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.
004	G	Oil & Grease	mg/l	<2.0	-	<5	-	20	-
	G	Susp. Solids	mg/l	<5	-	<5	-	-	-
	G	TOC	mg/l	2.6	-	2.44	-	-	-
		Flow, total	MGD			0.004			

STATION	T*	PARAMETER	UNITS	<u>OHIO EPA</u>		<u>ENTITY</u>		<u>PERMIT LIMITS</u>	
				CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.
003	C	BOD ₅	mg/l	<2.0	ND	<3	ND	64	191
	C	Susp. solids	mg/l	<5.0	ND	5	13.25	130	389
	C	COD	mg/l	<20	-	<20	-	-	-
	C	NH ₃	mg/l	0.261	-	<0.2	-	-	-
	G	Oil & Grease	mg/l	<2.0	ND	<5	ND	20	60
	C	Iron, tot.	ug/l	<50	-	-	-	-	-
	C	Chromium, tot.	ug/l	<2.0	ND	<5	ND	576	1.72
	C	Copper, tot.	ug/l	34.1 ¹	0.09	<5	ND	40	0.120
	C	Lead, tot.	ug/l	<2	ND	<5	ND	143	0.427
	G	Nickel, tot.	ug/l	14.4	0.038	16.1	0.043	827	2.47
	C	Zinc, tot.	ug/l	<10	ND	<20	ND	320	0.95
	C	Diethylphthalate	ug/l	5.3	0.014	<5	ND	203	0.607
			Flow, tot.	MGD			0.7		

(¹Copper estimated due to poor correlation between duplicates)

*SAMPLE TYPE: G=grab; C=composite; ND= non-detectable (below detection limit)

All of the following volatile and semi-volatile parameters were below detection limits on Outfall 003, based on OEPA test results. Concentration and loading limits from the permit are shown in the final columns.

G	Carbon Tetrachloride	ug/l				38	0.114
G	Chloroform	ug/l				46	0.138
G	Toluene	ug/l				80	0.24
G	Benzene	ug/l				136	0.407
C	Acenaphthylene	ug/l				59	0.177
C	Acenaphthene	ug/l				59	0.177
G	Acrylonitrile	ug/l				242	0.724

(Outfall 013, con't-Kraton)

C	Anthracene, Gen. Org.	ug/l	0.46	-
C	3,4-Benzofluoranthene	ug/l	61	0.182
C	Benzo(k)fluoranthene	ug/l	59	0.177
C	Benzo-A-Pyrene	ug/l	61	0.182
G	Chlorobenzene	ug/l	28	0.084
G	Chloroethane	ug/l	268	0.802
C	Chrysene	ug/l	59	0.177
C	Dimethylphthalate	ug/l	47	0.141
G	Ethylbenzene	ug/l	108	0.323
C	Fluoranthene	ug/l	68	0.203
C	Fluorene	ug/l	59	0.177
C	Hexachloroethane	ug/l	54	0.084
G	Methyl chloride	ug/l	190	0.568
G	Methylene chloride	ug/l	89	0.266
C	Nitrobenzene	ug/l	68	0.203
C	Phenanthrene	ug/l	59	0.177
C	Pyrene	ug/l	67	0.200
G	Tetrachloroethylene	ug/l	56	0.168
G	1,1-Dichloroethane	ug/l	211	0.631
G	1,1-Dichloroethylene	ug/l	25	0.075
G	1,1,1-Trichloroethane	ug/l	54	0.162
G	1,1,2-Trichloroethane	ug/l	54	0.162
C	Benzo(A)Anthracene	ug/l	59	0.177
G	1,2-Dichloroethane	ug/l	59	0.177
C	1,2-Dichlorobenzene	ug/l	163	0.488
G	1,2-Dichloropropane	ug/l	230	0.688
G	1,2-trans-Dichloroethylene	ug/l	54	0.162
C	1,2,4-Trichlorobenzene	ug/l	140	0.419
C	1,3-Dichlorobenzene	ug/l	44	0.132
C	1,4-Dichlorobenzene	ug/l	28	0.084
C	2-Chlorophenol	ug/l	98	0.293
C	2-Nitrophenol	ug/l	69	0.206
C	2,4-Dichlorophenol	ug/l	112	0.335
C	2,4-Dimethylphenol	ug/l	36	0.108
C	2,4-Dinitrotoluene	ug/l	285	0.852
C	2,4-Dinitrophenol	ug/l	123	0.368
C	2,6-Dinitrotoluene	ug/l	641	1.917
C	4-Nitrophenol	ug/l	124	0.371
C	4,6-Dinitro-o-cresol	ug/l	277	0.829
C	Phenol	ug/l	26	0.078
C	Naphthalene	ug/l	59	0.177
C	Bis(2-ethylhexyl)phthalate	ug/l	279	0.835
C	Di-N-Butyl Phthalate	ug/l	57	0.171
G	Vinyl Chloride	ug/l	268	0.802

(Outfall 013, con't-Kraton)

G	Trichloroethylene	ug/l	54	0.162
C	Hexachlorobenzene	ug/l	28	0.084
C	Hexachlorobutadiene	ug/l	49	0.147
G	1,3-Dichloropropylene	ug/l	24	-
G	Styrene, total	ug/l	-	-
G	Ethylene dibromide	ug/l	-	-