



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 10, 2007

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

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

Dear Mr. Roesch:

On March 12, 13, and 14, 2007, I was part of the U.S. EPA Multi-Media Inspection being conducted at Kraton Polymers. During this time, I also conducted a Compliance Evaluation Inspection (CEI). The purpose of the CEI was to determine Kraton's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. There were numerous people present representing Kraton, for the inspection, Susan Virgilio and Mark Moloney represented U.S. EPA for wastewater inspection and I represented Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected during the inspection and a copy of my inspection is attached.

As a result of Ohio EPA's inspection, I have the following comments:

1. Kraton has recently had NPDES Permit effluent violations at Outfall 002 for arsenic. Kraton has identified a new coal with more minerals as being the possible source. The additional minerals have caused the ferrous sulfate feed to not be effective. Kraton has used sulfuric acid to help adjust the pH of the bottom ash stream to the proper range for the ferrous sulfate to be effective. The sulfuric acid feed appears to have helped drop the arsenic to acceptable levels.

Kraton has requested to continue feeding of sulfuric acid. The sulfuric acid feed is acceptable with Ohio EPA.

2. Kraton showed some toxicity on its sample from Outfall 003. Kraton performed some additional sampling for the combination of Outfalls 001 and 003 and no toxicity was detected. Outfalls 001 and 003 combine before discharging to Davis Creek. Ohio EPA may look at putting an additional outfall in the NPDES Permit to monitor toxicity in the future.

3. Kraton is currently dredging out one of the two bottom ash slag ponds. The dredging is being done as regular operation and maintenance.

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 Polymers appeared to be compliance with its NPDES Permit at the time of the inspection. Kraton is actively addressing the arsenic violations at Outfall 002 and appears to have returned to compliance with the NPDES Permit effluent limitations.

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

Enclosure

- c: Susan Virgilio, U.S. EPA Region V
- c: Mark Moloney, U.S. EPA Region V, Westlake Office
- c: Jim Thrall, Kraton
- c: Ginny Britton, Kraton
- c: Erik Sims, Kraton

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIF00008*KD	OH0007030	March 12-14, 2007	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)

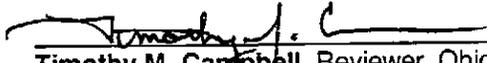
See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

4/10/07

Date



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

4/10/07

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 _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: *One of bottom ashponds out of service for O&M.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0</u> %				
b. Any collection system overflows since last inspection (CSO <u> </u> SSO <u> </u>)				
c. Regulatory agency notified of overflow (SSOs)				
d. CSO O and M plan provided and implemented				
e. CSOs monitored and reported in accordance with permit				
f. Portable pumps used to relieve system				
g. Lift station alarm systems provided and maintained				
h. Are lift stations equipped with permanent standby power or equivalent				
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection				
j. Any complaints received since last inspection of basement flooding				
k. Are any portions of the sewer system at or near capacity				

Comments:

H. SLUDGE MANAGEMENT

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

	Yes	No	N/A	N/E
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/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: _____ ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _____ ultrasonic & weir _____ X Specify: <u> * </u>				
b. Calibration frequency adequate (date of last calibration: <u> 1/month </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: _____ X _____ Daily _____ Weekly _____ Monthly _____ Other				

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

Part 2 - Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used				X
Conform with 40 CFR 136.3				X
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3, Laboratory - General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)				X
b. If alternate analytical procedures are used, proper approval has been obtained				X
c. Analyses being performed more frequently than required by permit	X			
d. If (c) is yes, are results reported in permittee's self-monitoring report	X			
e. Commercial laboratory used	X			
1. Parameters analyzed by commercial lab: <u> Kraton analyzes pH and TSS </u>				
2. Lab name: <u> All other parameters done by Kemron </u>				

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained				X
g.	Satisfactory calibration and maintenance of instruments and equipment				X
h.	Adequate records maintained				X
i.	Results of latest U.S. EPA quality assurance performance sampling program: Date: _____ Satisfactory _____ Marginal _____ Unsatisfactory				

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	Murky	None
002	None	None	None	None	None	Clear	
003	None	None	None	None	None	Clear	
004	None	None	None	None	None	Clear	

Comments:

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: