



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
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

December 22, 2008

Re: Ross County
P.H. Glatfelter Company
Compliance Inspection
Correspondence (IWW)

Mr. Lee Bendtsen, Vice President
P.H. Glatfelter Company
P.O. Box 2500
Chillicothe, Ohio 45601

Dear Mr. Bendtsen:

On December 9, 2008, I conducted a compliance evaluation inspection to determine the facility's compliance status with the terms and conditions of NPDES Permit Number OIA00002*HD. This inspection was also conducted as a pre-permit inspection as the current NPDES permit expires on January 31, 2009. Mr. Jim Flanders and Joe Coleman, wastewater treatment plant operator was present during our inspection.

As a result of the inspection, the following observations were made.

1. At the time of my inspection one of the rectangular clarifiers was taken off line for cleaning and minor maintenance although adequate treatment capacity was still being maintained with the current operations. The other rectangular clarifier and circular clarifier appeared to be functioning properly and providing effective settling.
2. The two aerated lagoons were being well mixed with several large floating aerators/mixers to provide secondary sludge digestion. At the time of the inspection, all but one of the aerators/mixers were in operation. Discussion was held regarding a future evaluation to determine more efficient methods of aeration for the lagoons. Prior to any changes made in the mechanical aeration of the lagoons a comprehensive engineering study shall be completed and submitted to our office for review to insure adequate BOD removal is maintained. Upon review of the study it may be determined that a PTI is necessary.
3. The two secondary clarifiers were free of any floating algae and the treated wastewater was relatively clear and amber in color. According to Mr. Coleman these two secondary clarifiers are on a five year cleaning and maintenance schedule which appears adequate as minimal algae growth was observed near the weirs and no major breakdowns have been reported in several years.
4. The sludge belt and screw press dewatering the sludge were found to be working properly and removing a large percentage of water from the waste sludge. The waste sludge, or BYPRO, was being stored in roofed storage areas awaiting disposal at mine reclamation sites or at a licensed landfill.

5. Inspection of the lift station and piping revealed a significant leak in the primary force main pipe providing flow to the lagoons. A majority of the leakage was draining back into the wet well although some leakage was going onto the ground. According to Mr. Coleman, the repair would require a plant shutdown as flow can not easily be isolated. Until a plant shutdown is scheduled an impermeable barrier should be placed under the leak to direct drainage back into the wet well until permanent repairs can be made at the soonest available time.
6. Inspection of the storm water outfalls showed all areas to be relatively clean and free of any debris which could result in pollution to adjacent streams. All of the storm water outfalls were clearly labeled although the receiving catch basins were not marked storm water only. Stenciling or labeling of the immediate receiving catch basins should be done to inform employees those areas drain to waterways. If you need assistance in finding appropriate stencils or labels you may contact our storm water coordinator, Aaron Wolfe at (740) 380-5277. General housekeeping should continue to keep the impervious areas clean to prevent discharge of suspended solids during storms.

The most recent approved copy of a Sludge Management Plan (SMP) in our files for your facility is dated 10/19/95. In order to approve an updated SMP, two copies of our PTI Form A and B9 with a two hundred dollar fee shall be submitted with an updated SMP (Land Management Plan) describing intended disposal practices and future monitoring. These application forms will be used in addition to some current runoff monitoring requirements to draft a management plan through our NPDES software program. Please address the above noted concerns and submit a written response within 21 days upon receipt. Attached is a copy of my detailed inspection for your review. Your assistance during this inspection was appreciated and if you have any questions, please call me at (740) 380-5416.

Sincerely,



Jake Greuey
District Representative
Division of Surface Water

JJG/dh

Enclosure

- c: Joe Coleman, Wastewater Operator, P.H. Glatfelter
- c: Kathy Wiedeman, Env. Manager, P.H. Glatfelter
- c: Jim Flanders, Env. Engineer, P.H. Glatfelter

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01A00002*HD	OH0004481	December 9, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
P.H. Glatfelter Company, Chillicothe Mill 401 South Paint Street Chillicothe, Ohio 45601	8:45 a.m.	February 1, 2004
	Exit Time	Permit Expiration Date
	11:25 a.m.	January 31, 2009

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jim Flanders, Environmental Engineer	(740) 772-3316
Name, Address and Title of Responsible Official	Phone Number
Lee Bendtsen, Vice President P.H. Glatfelter Company P.O. Box 2500 Chillicothe, Ohio 45601	(740) 774-1185

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>--</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>S</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>S</u> Sludge Storage/Disposal	<u> </u> Other
<u>M</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.

Jake Greuey
Jake Greuey, Inspector, Ohio EPA, Southeast District Office

12/22/08
Date

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

12/22/08
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: <u>NPDES</u>			X	
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: <u>X*</u>	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: No. of shifts: <u>3</u> Days/Week: <u>7</u>	X			
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 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments:

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

Comments: *Process line near research center has overflowed during heavy rain, routine cleaning and inspection schedule has been implemented to significantly reduce overflows.

IV. SLUDGE MANAGEMENT

	Yes	No	N/A	N/E
a. Sludge adequately disposed (Method: <u>Land application or Landfill</u>)	X			
b. If sludge is incinerated, where is ash disposed of? _____		X		
c. Is sludge disposal contracted (Name: <u>Land application by Waterloo Coal</u>)	X			
d. Has amount of sludge generated changed significantly since last inspection		X		
e. Adequate sludge storage provided at facility	X			
f. Land application sites monitored and inspected per state rules	X			
g. Records kept in accordance with state rules	X			
h. Any complaints received in last year regarding sludge		X		
i. Is sludge adequately processed (digestion, dewatering, pathogen control) in accordance with Ohio EPA rules	X			

Comments:

SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: <u>X</u> ultrasonic & parshall flume _____ calculated from influent _____ weir _____ other _____ ultrasonic & weir _____ specify:	X			
b. Calibration frequency adequate (date of last calibration: <u>Maintained weekly</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:

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	NE
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: