



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

February 7, 2007

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 4, 2006, I conducted a Compliance Sampling Inspection (CSI) at the P.H. Glatfelter Company's Chillicothe paper mill facility. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES Permit Number OIA00002*HD. A 24-hour composite sampler was also set up by Joann Montgomery and Kelly Capuzzi from our water quality section to conduct compliance sampling of your facility. Mr. Randy Keefer 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 drained 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 the aerators/mixers were in operation.
3. The two secondary clarifiers were free of any algae and the treated wastewater was relatively clear and amber in color. According to Mr. Keefer, these two secondary clarifiers are on a two-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. At the time of my inspection, the screw press was off line. Please provide documentation describing why the press was off line and a schedule as to when it will be back in use. 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 storm water outfalls showed all areas to be relatively clean and free of any debris which could result in pollution to adjacent streams. The recently ordered signs for the outfalls should be installed once they arrive to clearly label each outfall. General housekeeping should continue to keep the impervious areas relatively clean to prevent solids runoff during storms.

In addition to evaluating the current plant conditions, compliance samples were collected and analyzed for those parameters listed on your discharge permit. At the time of the inspection, a 24-hour composite was collected for the analysis of the permit required composite parameters in addition to toxicity samples and grab samples for all others. Results from our sampling found all parameters analyzed to be within permit limits and the effluent to have no toxicity. The effluent was observed as a clear amber color with minimal suspended solids. Table 1 is attached which has the field chemistry results as well as Table II which includes the permit parameter results. Attached is a copy of the complete toxicity report. If you have any questions regarding the toxicity report, please contact Joann Montgomery at (740) 380-5433 or Jon McLaughlin in our bioassay lab at (614) 644-4228.

The most recent copy of the Sludge Management Plan (SMP) in our files is dated 10/19/95. Please provide a copy of the most recent version of your SMP or a schedule to complete an updated version. Please address the above noted concerns and submit a written response **within 30 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/mlm

Enclosure

- c: Randy Keefer, Wastewater Operator, P.H. Glatfelter
Kathy Wiedeman, Environmental Manager, P.H. Glatfelter
Bryan Barker, Environmental 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 4, 2006	S	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	9:15 a.m.	February 1, 2004
	Exit Time	Permit Expiration Date
	11:00 a.m.	January 31, 2009

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Randy Keefer, Wastewater Manager	(740) 772-0180
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>N</u> Collection System		

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

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

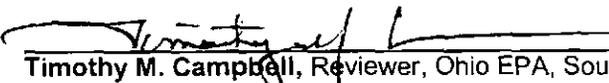
See attached letter.



 Jake Greuey, Inspector, Ohio EPA, Southeast District Office

2/6/07

 Date



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

2-7-07

 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 <u>NPDES 01A00002*HD</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: # of shifts <u>3</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: <u> </u>			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 <u> </u> on MORS <u> </u> 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: *Generator has to be brought in.

**At the time of the inspection the sludge screw press was not in operation.

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				
1. Parameters analyzed by commercial lab: <u>Toxicity-EA Engineering; Dioxin Pace Analytical</u>	X			
2. Lab name: <u>Glatfelter Corporate Lab HEP Lab</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	Clear	None	None	Amber	

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		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: Glatfelter Paper

DATES SAMPLED: December 4 & 5, 2006

Station	Date	Time	Parameter	Units	Value	Permit Limits
001	12/4	0910	pH	S.U.	8.12	6.5-9.0
			Temperature	°C	22.73	-
			Dissolved oxygen	mg/l	6.52	-
			Conductivity	umhos/cm	2054	-
001	12/5	0905	pH	S.U.	7.82	6.5-9.0
			Temperature	°C	24.29	-
			Dissolved oxygen	mg/l	5.30	-
			Conductivity	umhos/cm	2159	-

TABLE II

COMPLIANCE SAMPLING DATA

FACILITY: Glatfelter Paper

DATES SAMPLED: December 4-5, 2006

STATION	T*	PARAMETER	UNITS	OHIO EPA		ENTITY		PERMIT LIMITS	
				(KG/D) CONC.	LOAD.	(KG/D) CONC.	LOAD.	(KG/D) CONC.	LOAD.
001	C	Susp. solids	mg/l	14	1477	17	1794	172	21,089
	C	Diss. solids	mg/l	1410	-	1592	-	-	-
	C	BOD ₅	mg/l	4	422	8	844	74	9072
	C	Ammonia	mg/l	<0.05	-	0.22	-	-	-
	C	TKN	mg/l	0.9	-	1.9	-	-	-
	C	Nitrate-nitrite	mg/l	<0.1	-	<0.02	-	-	-
	C	Phosphorus	mg/l	0.467	-	0.21	-	-	-
	C	Barium, tot.	ug/l	178	-	140	-	-	-
	C	Mercury, tot.	ug/l	<0.2	-	<0.2	-	-	-
	C	Zinc, tot.	ug/l	44	-	34	-	-	-
		Flow, total	MGD			27.88			

*SAMPLE TYPE: G=grab; C=composite