

Sowaga



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

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[www.epa.state.oh.us](http://www.epa.state.oh.us)

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

February 6, 2008

Mr. Satish Damodaran, Mill Manager  
Appleton Papers, Inc. - West Carrollton Mill  
1030 West Alex-Bell Road  
West Carrollton, OH 45449

Re: Montgomery County, Appleton Papers, Inc.; Compliance Evaluation Inspection

Dear Mr. Damodaran:

On January 31, 2008, John Spitler and I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0009377; OEPA Permit No. 11A00004\*LD). Representing this facility was Nancy McDonnell, Terry Smith, Layne Mitchell and Jerry Abner. A copy of my inspection report is enclosed.

All areas evaluated as part of the inspection were found to be acceptable. Therefore, no response is required at this time.

If you have any questions, please call me at (937) 285 - 6096.

Sincerely,

Ned Sarle  
Division of Surface Water  
Permits Section

Enclosure

cc: Nancy McDonnell, Appleton Papers, Inc.





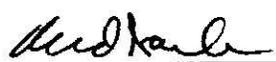
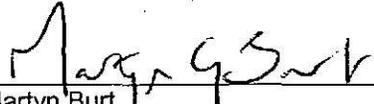
State of Ohio Environmental Protection Agency  
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NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11A00004*LD	OH0009377	1/31/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Appleton Papers Inc., West Carrollton Mill 4000 Hydraulic Road and 1030 West Alex Bell Road West Carrollton, OH 45449	9:30 A.M.	9/1/2005
	Exit Time	Permit Expiration Date
	12:30 P.M.	6/30/2007
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Nancy McDonnell, Environmental Manager	(937) 847-7310	
Terry Smith, Utilities Supervisor	(937) 847-7315	
Layne Mitchell, Lab Technican	(937) 847-7384	
Jerry Abner, WWTP Operator	(937) 847-2840	
Name, Address and Title of Responsible Official	Phone Number	
Satish Damodaran, Mill Manager 1030 West Alex-Bell Road West Carrollton, OH 45449	(937) 847-7022	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments	
Inspector	Reviewer
 Ned Sarle Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 1/31/08	Date 2/6/08

NPDES Permit #: OH0009377  
OEPA Permit #: 1IA00004\*LD

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

None.

**Section E: Permit Verification**

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

See Attached Summary of Findings / Comments.

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed ..... N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Operator holds unexpired license of class required by permit..... N/A  
Class:
- (f) Routine and preventative maintenance schedule/performed on time..... Y
- (g) Any major equipment breakdown since last inspection..... Y
- (h) Operation and maintenance manual provided and maintained.... Y
- (i) Any plant bypasses since last inspection..... Y
- (j) Regulatory agency notified of bypasses..... Y  
On MORs  and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... N

**Collection System:**

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N/A  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

**Comments/Status:**

See Attached Summary of Findings / Comments.

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date:                      Approval #:                      Not submitted     N/A
- (b) Sludge management plan current..... N/A  
(c) Sludge adequately disposed..... Y  
(Method: Rumpke Landfill)  
(d) If sludge is incinerated, where is ash disposed of  
(e) Is sludge disposal contracted..... N/A  
(Name:                      )  
(f) Has amount of sludge generated changed significantly since  
last inspection..... N  
(g) Adequate sludge storage provided at plant..... Y  
(h) Land application sites monitored and inspected per SMP..... N/A  
(i) Records kept in accordance with State and Federal law..... Y  
(j) Any complaints received in last year regarding sludge..... N  
(k) Is sludge adequately processed (digestion, pathogen control)..... N/A

**Comments/Status:**

None.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary flow measuring device operated and maintained..... Y  
Type of device: Ultrasonic & Parshall flume     Ultrasonic & Weir     Weir   
Calculated from influent     Other  (Specify:                      )
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration:                      )
- (c) Secondary instruments operated and maintained..... Y  
(d) Flow measurement equipment adequate to handle full range  
of flows..... Y  
(e) Actual flow discharged is measured..... N  
(f) Flow measuring equipment inspection frequency  
 Daily  Weekly  monthly  other

**Comments/Status:**

See Attached Summary of Findings / Comments.

**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
  - (i) Samples refrigerated during compositing..... Y
  - (ii) Proper preservation techniques used..... Y
  - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

**Laboratory:**

*General*

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: BOD, TSS, NH3, Phosphorus, Barium, Strontium, Aldrin, Gamma BHC, Heptachlor, SAS

Lab name: Test America, ANA lab - SAS

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... N
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program:  
 Satisfactory  Marginal  Unsatisfactory      Date:

**Comments/Status:**

NPDES Permit #: OH0009377  
 OEPA Permit #: 11A00004\*LD

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	-	-	-	-	-	(*)	

**Comments/Status:**

(\*) The discharge had a slight red color.  
 Outfall 002 and 003 were not discharging at time of inspection.

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

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

- (1) What is the cause of the condition?
- (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/Status:**

None.

NPDES Permit #: OH0009377

OEPA Permit #: 11A00004\*LD

### **Summary of Findings / Comments**

A review of the Monthly Operating Reports (MORs) for July 2005 through December 2007 indicated several NPDES Permit violations. These violations are listed on Attachment I. Appleton Papers, Inc. (Appleton) has adequately addressed these violations. Future violations must continue to be reported as required by the NPDES Permit as addressed in Part III, Section 12 titled "Noncompliance Notification."

The NPDES Permit is based on an average daily flow rate of 6.5 MGD. A review of the MORs for September 2005 through December 2007 indicated the average daily flow was 7.32 MGD and the peak daily flow rate was 9.65 MGD.

The WWTP consists of a mechanical bar screen, a channel monster, two primary clarifiers, an aerated lagoon, two secondary clarifiers, and a polishing lagoon. Sludge is held in a sludge holding tank prior to being dewatered in a sludge press. The dewatered sludge is then hauled to the Rumpke Landfill.

The wastewater is sampled either using grab samples or a 24 hour time based composite sample.

On November 9, 2005, the WWTP was bypassed when the channel monster and the influent high water alarm failed. This resulted in a bypass of 100,000 to 300,000 gallons of industrial wastewater when the influent channel flooded. Along with this wastewater, a significant amount of sodium hydroxide which is used for cleaning the paper making machine was bypassed. Any recoverable wastewater was collected and treated at the WWTP. Solids were then removed from this area. Finally, citric acid was used to neutralize the contaminated area. Appleton adequately addressed this bypass. Any future WWTP bypasses must be reported in accordance to the NPDES Permit as detailed in Part III, Section 11 titled "Unauthorized Discharges."

The influent flow meter consists of a parshall flume and ultrasonic flow meter and is used to estimate WWTP discharge. The ultrasonic flow meter is only calibrated whenever flow readings become suspect. The Ohio EPA typically recommends that the flow measurement equipment be calibrated once a year. The Ohio EPA recommends that Appleton contact the manufacture of this equipment and determine their recommendations.

Appleton has a power house that produces the facility's energy needs. Coal is used for the facility's energy requirements and produces bottom ash and fly ash. The bottom ash is used as part of the daily cover at the Burger C&D landfill in Hamilton County. Fly ash is either hauled to the Rumpke Landfill or to S&B Industrial Minerals, Inc. in Hamilton County.

NPDES Permit #: OH0009377

OEPA Permit #: 11A00004\*LD

Attachment 1

Appleton Papers, Inc., West Carrolton Mill

Effluent Limit Violations for July 2005 through December 2007

Reporting Period	Station	Parameter	Limit Type	Units	Permit Limit	Reported Value
August 2005	001	DO	Daily	mg/l	5.0	4.9
December 2005	001	Ammonia	Daily	mg/l	3.75	6.35
December 2005	001	Ammonia	Daily	mg/l	3.75	4.02
December 2005	001	Ammonia	Daily	kg/day	92	150
December 2005	001	Ammonia	Daily	kg/day	92	110