



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



11A0001020070911

MONTGOME W CARROLLTON PARCHMENT CO

OSIKA, MARY

2007/09/11



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2911

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

September 11, 2007

Brandon Carpenter
West Carrollton Parchment Company
1 South Elm Street
P.O. Box 49098
West Carrollton, Ohio 45449-49098

RE: Compliance Evaluation Inspection
NPDES Permit 11A00010*ID

Dear Mr. Carpenter:

On August 17, 2007, Laura Pohlman (intern) and I met with you to inspect the wastewater treatment system at West Carrollton Parchment Company and the discharge to Owl Creek. Attached is a copy of my Compliance Evaluation Inspection Report regarding compliance with the NPDES Permit.

All areas evaluated were rated as satisfactory with the exception of effluent/receiving waters and compliance schedules which are rated as unsatisfactory. The attached summary details the effluent limit excursions in the Notice of Violation.

This facility has been referred for an enforcement action which is pending. If there are any proposed actions by the company which may improve the effluent quality and bring the facility into compliance with the NPDES permit, please submit your response with these actions along with the date or proposed date of these actions. This response should be submitted within ten days of receipt of this letter. If you have any questions regarding the compliance evaluation inspection, please call me at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Great Miami River Basin
Division of Surface Water

Enclosure





10

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date (dd/mm/yy)	Inspection Type	Inspector	Facility Type
11A00010*ID	OH0045322	8/17/2007	Compliance	State	Industrial

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
West Carrollton Parchment Company 1 South Elm Street West Carrollton, Ohio	10:00 am	August 1, 2003
	Exit Time	Permit Expiration Date
	11:00 am	June 30, 2007

Name(s) and Titles of On-Site Representative(s)	Phone Number(s)
Brandon Carpenter, Technical Director	937-859-3621 x 1242

Name, Title and Address of Responsible Official:	Phone Number
Charles Huber West Carrollton Parchment Company 1 South Elm Street West Carrollton, Ohio	937-859-3621

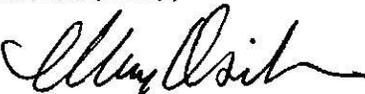
Section C: Areas Evaluated During Inspection

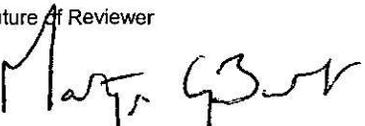
(S = Satisfactory; M = Marginal; U = Unsatisfactory; NA = Not Applicable)

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

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheet for summary of findings and comments.

Name and Signature of Inspector(s)	Agency / Office / Telephone	Date
Mary Osika 	Ohio EPA / Southwest District Office / (937) 285- 6101	9/11/07

Name and Signature of Reviewer	Agency / Office / Telephone	Date
Martyn Burt 	Ohio EPA / Southwest District Office / (937) 285- 6034	9/11/07



Sections E thru K: Complete on all inspections as appropriate. N/A - Not Applicable N/E - Not Evaluated

Section 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 APPLIC.	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 / STATUS:

Section 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 Permit</u>	x			
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE		x		

COMMENTS / STATUS: See summary of findings/comments.



Section G: Operation and Maintenance

TREATMENT WORKS:	YES	NO	N/A	N/E
(a) STANDBY POWER AVAILABLE; GENERATOR __ 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	x			
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS REQUIRED BY PERMIT CLASS:			x	
(f) ROUTINE AND PREVENTIVE MAINTENANCE SCHEDULED/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		

COLLECTION SYSTEM:	YES	NO	N/A	N/E
(a) PERCENT COMBINED SYSTEM ___%			x	
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSO_ SSO_)			x	
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (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/STATUS:



Section H: Sludge Management

(a) SLUDGE MANAGEMENT PLAN (SMP) SUBMITTED DATE _____ APPROVAL # _____ NOT SUBMITTED N/A

	YES	NO	N/A	N/E
(b) SLUDGE MANAGEMENT PLAN CURRENT			x	
(c) SLUDGE ADEQUATELY DISPOSED (METHOD: hauling)			x	
(d) IF SLUDGE IS INCINERATED, WHERE IS ASH DISPOSED OF:			x	
(e) IS SLUDGE DISPOSAL CONTRACTED (NAME:)			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/STATUS:

Section I: Self-Monitoring Program

Part 1. Flow measurement	YES	NO	N/A	N/E
(a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED & MAINTAINED	x			
TYPE OF DEVICE: ULTRASONIC & PARSHALL FLUME <input checked="" type="checkbox"/>				
ULTRASONIC & WEIR <input type="checkbox"/> WEIR <input type="checkbox"/> CALCULATED FROM INFLUENT <input type="checkbox"/>				
<input type="checkbox"/> OTHER (Specify :)				
(b) CALIBRATION FREQUENCY ADEQUATE	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: <input type="checkbox"/> DAILY WEEKLY <input checked="" type="checkbox"/> MONTHLY <input type="checkbox"/> OTHER - when needed	x			

COMMENTS/STATUS:



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			
(e) SAMPLES REFRIGERATED DURING COMPOSITING	x			
(f) PROPER PRESERVATION TECHNIQUES USED	x			
(g) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3	x			
(h) 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			
(i) ADEQUATE RECORDS MAINTAINED OF SAMPLING DATE, TIME, EXACT LOCATION, ETC	x			

COMMENTS/STATUS:

Part 3. Laboratory	YES	NO	N/A	N/E
GENERAL				
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 all except pH	x			
(2) LAB NAME: <u>Belmont Park Labs and Enviroscience</u>	x			

QUALITY CONTROL/QUALITY ASSURANCE				
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED				x
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT				x
(f) ADEQUATE RECORDS MAINTAINED				x
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM				x
DATE: ___ SATISFACTORY ___ MARGINAL ___ UNSATISFACTORY				x

COMMENTS/STATUS:



Section J: Effluent/Receiving Water Observations							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOLIDS	VISIBLE COLOR	OTHER
001							biological growth

COMMENTS/STATUS: Pictures taken of receiving stream (Owl Creek) at outfall.

Section 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 OTHER THAN SMOKESTACKS				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 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:



Summary of Findings/Comments

During the inspection at the discharge to Owl Creek, the nuisance biological growth was again seen in Owl Creek which is a violation of general effluent limitations in Part III, General Conditions of the NPDES permit and Ohio Water Quality Standards under Ohio Administrative Code 3745-1-04 (E).

Attached to this summary is a Notice of Violation for effluent limit exceedances of the NPDES permit for this facility during the review period of July 2006 through June 2007. Twenty three exceedances are listed during the review period. The parameters in bold text highlight values above the wasteload allocation calculated to be protective of water quality standards in the Great Miami River.

The average daily flow rate from the facility to Owl Creek during the review period is approximately 0.858 MGD. The NPDES Permit limitations are based on a flow rate of 0.700 MGD. West Carrollton Parchment Company has requested in the application for NPDES permit renewal, submitted on December 8, 2006, an increase in flow to 1.4 MGD.

This facility has been referred for enforcement action by this agency. This action is still pending. The NPDES Permit renewal for this facility is scheduled for some time in 2009 when the permits for major dischargers in the Middle to Lower Great Miami River will be renewed. The non-compliance issues will need to be addressed within the pending enforcement action in order to renew the NPDES permit for this facility.



NOTICE OF VIOLATION

EFFLUENT LIMIT EXCEEDANCES AT OUTFALL 001 FROM JULY 2006 – JUNE 2007

<u>Parameter</u>	<u>Date</u>	<u>Permit Limit</u>	<u>Value Reported</u>
Residue, Total Dissolved (monthly average)	July 2006	1500 mg/l 3974 kg/day	2250 mg/l 6923 kg/day*
Residue, Total Dissolved (monthly average)	Aug. 2006	1500 mg/l 3974 kg/day	2690 mg/l 8287 kg/day*
Copper, Total Recov. (monthly average)	Aug. 2006	0.066 kg/day	0.067 kg/day*
Copper, Total Recov. (daily max.)	Aug. 9, 2006	42 ug/l 0.1113 kg/day	44 ug/l 0.1355 kg/day*
Residue, Total Dissolved (monthly average)	Sept. 2006	1500 mg/l	2260 mg/l
Residue, Total Dissolved (monthly average)	Oct. 2006	1500 mg/l 3974 kg/day	2280 mg/l 6860 kg/day*
Residue, Total Dissolved (monthly average)	Nov. 2006	1500 mg/l 3974 kg/day	3320 mg/l 10279 kg/day*
Residue, Total Dissolved (monthly average)	Dec. 2006	1500 mg/l 3974 kg/day	3300 mg/l 10766 kg/day*
Residue, Total Dissolved (monthly average)	Jan. 2007	1500 mg/l 3974 kg/day	2590 mg/l 10430 kg/day*
Residue, Total Dissolved (monthly average)	Feb. 2007	3974 kg/day	5611 kg/day*
Residue, Total Dissolved (monthly average)	Mar. 2007	1500 mg/l 3974 kg/day	2830 mg/l 11311 kg/day*
Residue, Total Dissolved (monthly average)	May 2007	1500 mg/l 3974 kg/day	2810 mg/l 9784 kg/day*
Residue, Total Dissolved (monthly average)	Jun. 2007	1500 mg/l 3974 kg/day	2360 mg/l 5529 kg/day*

* loads are calculated based on concentration and flow rate.



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