



**Environmental
Protection Agency**

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



11A0001020080722

MONTGOME W CARROLLTON PARCHMENT CO

OSIKA, MARY

2008/07/22



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

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

July 21, 2008

Alan Berens
Ahlstrom West Carrollton Inc.
1 South Elm Street
P.O. Box 49098
West Carrollton, Ohio 45449-49098

RE: Compliance Evaluation Inspection
NPDES Permit 11A00010*ID

Dear Mr. Berens:

On July 8, 2008, I met with Brandon Carpenter to inspect the wastewater treatment system at Ahlstrom West Carrollton 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 is in non-compliance with the NPDES permit. Enforcement action is still pending. Because this facility is under new ownership, I must ask 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. I request that you submit a response including any actions proposed 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
Division of Surface Water

Enclosures

cc: Brandon Carpenter, Ahlstrom West Carrollton Inc.







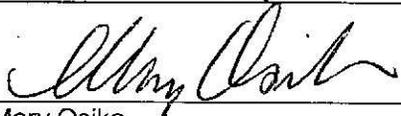
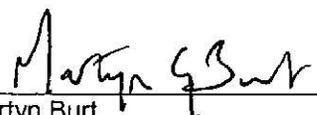
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11A0010*ID	OH0045322	7/8/2008	Compliance	State	Industrial

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ahlstrom West Carrollton Inc. 1 South Elm Street West Carrollton, Ohio	11:00 am	August 1, 2008
	Exit Time	Permit Expiration Date
	12:00 pm	June 30, 2007
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Brandon Carpenter, Technical Director	(937) 859-3621 x 1242	
Name, Address and Title of Responsible Official	Phone Number	
Alan Berens, General Manager 1 South Elm Street P.O. Box 49098 West Carrollton, Ohio 45449-0098	(937) 247-1225	

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	U	Compliance Schedule
S	Operations & Maintenance	U	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	S	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached sheet for summary of findings.	
Inspector	Reviewer
 7/21/08	 7/21/08
Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



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Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

Enclosures

cc: Brandon Carpenter, Ahlstrom West Carrollton Inc.

Permit # : 11A00010*ID
NPDES #: OH0045322

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..... N
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... Y
- (g) Notification given to State of new, different or increased discharges..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

(d) daily flows are on average are higher than the flow rates used for loading limits in the permit.

Section F: Permit Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... N
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in NPDES Permit 11A00010*ID
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

See summary of findings for effluent limit violations summary for the review period.



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) Wastewater Treatment Works classification (OAC 3745-7)..... N/A
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
 Class: I
- (f) Copy of certificate of Operator of Record displayed on-site..... N/A
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... N/A
- (b) Format of log book (i.e. computer log, hard bound book)
- (c) Log book(s) kept onsite (in an area protected from weather)..... N/A
- (d) Log book contains the following:
 - I. Identification of treatment works..... N/A
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N/A
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N/A
 - IV. Laboratory results (unless documented on bench sheets)... N/A
 - V. Identification of person making log entries..... N/A
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N/A

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

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- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in NPDES Permit 11A00010*ID
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

See summary of findings for effluent limit violations summary for the review period.

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (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:



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..... N/A
(Method:)
- (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/A
- (g) Adequate sludge storage provided at plant.....N/A
- (h) Land application sites monitored and inspected per SMP..... N/A
- (i) Records kept in accordance with State and Federal law..... N/A
- (j) Any complaints received in last year regarding sludge..... N/A
- (k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

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: March 2008)
- (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..... Y
- (f) Flow measuring equipment inspection frequency
Daily Weekly monthly other

Comments/Status:

They are operating 5 days/week Monday through Friday, all 3 shifts.

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (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:

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..... Y
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y
 - Parameters analyzed by commercial lab:
Everything except pH, temperature
Lab name: Belmont Park, EnviroScience

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (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: September 21, 2007

Comments/Status:



Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
11A00010001	No	No	No	Yes	No	No	No	Excessive biological growth

Comments/Status:

Photographs were taken of the outfall area, see photo log attached to this report.

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:

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..... Y
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 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab:
Everything except pH, temperature
Lab name: Belmont Park, EnviroScience

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
 - (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: September 21, 2007

Comments/Status:

NOTICE OF VIOLATION

EFFLUENT LIMIT EXCEEDANCES AT OUTFALL 001 FROM JULY 2007 – JUNE 2008

<u>Parameter</u>	<u>Date</u>	<u>Permit Limit</u>	<u>Value Reported</u>
Residue, Total Dissolved (monthly average)	July 2007	1500 mg/l 3974 kg/day	1650 mg/l 5545 kg/day*
Copper, Total Recov. (monthly average)	July 2007	25 ug/l 0.066 kg/day	36.3 ug/l 0.067 kg/day*
Copper, Total Recov. (daily max.)	July 12, 2007	0.1113 kg/day	0.12201 kg/day*
Residue, Total Dissolved (monthly average)	Aug. 2007	1500 mg/l 3974 kg/day	3060 mg/l 9960 kg/day
Residue, Total Dissolved (monthly average)	Sep. 2007	1500 mg/l 3974 kg/day	2800 mg/l 10131 kg/day*
Residue, Total Dissolved (monthly average)	Oct. 2007	1500 mg/l 3974 kg/day	3210 mg/l 11481 kg/day*
Residue, Total Dissolved (monthly average)	Nov. 2007	1500 mg/l 3974 kg/day	3740 mg/l 13278 kg/day*
Residue, Total Dissolved (monthly average)	Dec. 2007	1500 mg/l 3974 kg/day	2760 mg/l 11062 kg/day*
Residue, Total Dissolved (monthly average)	Jan. 2008	1500 mg/l 3974 kg/day	2700 mg/l 10423 kg/day*
Copper, Total Recov. (monthly average)	Jan. 2008	25 ug/l 0.066 kg/day	28.9 ug/l 0.11157 kg/day*
Copper, Total Recov. (daily max.)	Jan. 17, 2008	0.1113 kg/day	0.11157 kg/day
Residue, Total Dissolved (monthly average)	Feb. 2008	1500 mg/l 3974 kg/day	2800 mg/l 10163 kg/day*
Acute Toxicity, c. dubia	Feb. 14, 2008	1.0 TUa	1.1 TUa

Summary of Findings/Comments

An inspection of Owl Creek showed that the nuisance biological growth is still occurring immediately at and downstream of the discharge from Ahlstrom West Carrollton's discharge pipe 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). A photo log of the creek inspection is attached.

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 2007 through June 2008. Twenty nine (29) exceedances are listed during the review period.

The average daily flow rate from the facility to Owl Creek during the review period is approximately 0.870 MGD. The NPDES Permit limitations are based on a flow rate of 0.700 MGD.

Residue, Total Dissolved (monthly average)	Mar. 2008	1500 mg/l 3974 kg/day	3040 mg/l 8767 kg/day*
Residue, Total Dissolved (monthly average)	Apr. 2008	1500 mg/l 3974 kg/day	2760 mg/l 95481 kg/day*
Copper, Total Recov. (monthly average)	Apr. 2008	0.066 kg/day	0.35979 kg/day*
Copper, Total Recov. (daily max.)	Apr. 17, 2008	0.1113 kg/day	0.35979 kg/day*

* loads are calculated based on concentration and flow rate.



3 PHOTOS TAKEN OF OWL CREEK ON 7/8/2008 AT OUTFALL 001



Photo 1. Outfall 001 at Owl Creek showing some turbidity. Biological fungal growth was also seen here. Photo taken by Mary Osika, DSW.

Residue, Total Dissolved (monthly average)	Mar. 2008	1500 mg/l 3974 kg/day	3040 mg/l 8767 kg/day*
Residue, Total Dissolved (monthly average)	Apr. 2008	1500 mg/l 3974 kg/day	2760 mg/l 95481 kg/day*
Copper, Total Recov. (monthly average)	Apr. 2008	0.066 kg/day	0.35979 kg/day*
Copper, Total Recov. (daily max.)	Apr. 17, 2008	0.1113 kg/day	0.35979 kg/day*

* loads are calculated based on concentration and flow rate.



Photo 2. Immediately downstream from outfall 001 in a pool area of the creek. Water is quite turbid, due to biological growth. Photo taken by Mary Osika, DSW.





Photo 3. Owl Creek immediately upstream from outfall 001. Creek is typically dry most of the time except after a rain event. Photo taken by Mary Osika, DSW.



Photo 2. Immediately downstream from outfall 001 in a pool area of the creek. Water is quite turbid, due to biological growth. Photo taken by Mary Osika, DSW.