



**Environmental  
Protection Agency**

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



\*11A0001020110824\*

MONTGOME W CARROLLTON PARCHMENT CO

OSIKA, MARY

2011/08/24



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

August 24, 2011

Len Levy  
Ahlstrom West Carrollton LLC  
1 South Elm Street  
P.O. Box 49098  
West Carrollton, Ohio 45449-49098

RE: Compliance Evaluation Inspection  
Notice of Violation  
NPDES Permit 11A00010\*JD

Dear Mr. Levy:

On July 27, 2011, I met with Brandon Carpenter to conduct my annual compliance inspection of the wastewater treatment system and discharge at Owl Creek. Attached is a copy of my compliance inspection report, summary of findings and Notice of Violation.

The Summary of Findings lists the non-compliance issues that require a response by September 9, 2011. If Ahlstrom requires additional time to comply with the submittal date, please contact me at (937) 285-6101 to discuss an appropriate date.

Sincerely,

Mary Osika,  
Environmental Specialist  
Division of Surface Water

Enclosure

cc: Brandon Carpenter, Ahlstrom West Carrollton LLC



## **Summary of Findings/Comments**

The facility continues to operate one parchment line, 3 shifts per day, 5 -7 days per week. The average daily flow rate discharge from the facility to Owl Creek during the review period (July 2010 – July 2011) is approximately 0.66 MGD. The design flow rate which permit load limits are based is 1.0 MGD

The facility was issued a set of Administrative Orders on February 11, 2011 which contained a compliance schedule. On May 11, 2011, Ohio EPA reissued the NPDES Permit to Ahlstrom West Carrollton LLC. It should be noted that the NPDES permit reissuance allowed the increase in discharge from 0.7 MGD to 1.0 MGD and an increase in TDS from 1500 mg/l daily maximum to 3800 mg/l monthly average.

Attached to this summary is a Notice of Violation for effluent limit exceedances and monitoring requirement violations of the NPDES permit for this facility during the review period of June 2011 through July 2011. The Notice of Violation also includes non-compliance issues with the Administrative Orders.

Regarding order number 5 and 8, Ohio EPA will send a separate letter discussing these two orders in response to the June 23, 2011 acute toxicity value of 1.57 TUa and the email correspondence from Brandon Carpenter dated August 9, 2011.

During the inspection, it was noted that Ahlstrom had not prepared a written Standard Operating Procedure (SOP) for collecting the daily monitoring data and the associated calibration/operation of the instruments used to take samples and collect data. This issue was previously discussed in last year's inspection.

An inspection of Owl Creek at outfall 001 showed the presence of nuisance biological growth downstream of the discharge point. The nuisance biological growth is a violation of the 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). This issue will be discussed in context of Administrative Order no. 8 in a separate letter.

## **Areas Requiring a Response**

Ahlstrom must submit the Toxicity Identification and Reduction Plan to Ohio EPA as soon as possible or by September 9, 2011. Ahlstrom must prepare a written SOP as discussed above and submit a copy to Ohio EPA by September 9, 2011.



**AHLSTROM WEST CARROLLTON LLC**  
**NOTICE OF VIOLATION**

The review of the self-monitoring report for the month of June, 2011, for the discharge 001 from the Ahlstrom West Carrollton facility indicates an effluent limit violation and monitoring violation in regard to the NPDES permit 11A00010\*JD for this facility. The specific instances of non-compliance are as follows:

**EFFLUENT LIMIT VIOLATION AT OUTFALL 001**

<u>Parameter</u>	<u>Date</u>	<u>Permit Limit</u>	<u>Value Reported</u>
Acute toxicity, c. dubia	6/23/2011	1.0 TUa	1.57 TUa

**MONITORING FREQUENCY VIOLATIONS AT OUTFALL 001**

<u>Parameter</u>	<u>Frequency</u>	<u>Limit - # of samples</u>	<u>Reported</u>
Sulphate	1/week	4	1

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

A non-compliance notification was received on July 21, 2011 regarding the violations for June 2011. It should be noted that there was no limit violation for TDS because the limit is a monthly average and not a daily maximum limit.

**ADMINISTRATIVE ORDERS**

The review of the Administrative Orders issued to Ahlstrom on February 11, 2011 indicates that Ahlstrom is in compliance with order no. 2. The Order no. 3 has been superceded by a new limit established in the reissuance of the NPDES permit and has been addressed within this Notice of Violation as discussed above. Ahlstrom is not in compliance with Order no. 4 which required a Toxicity Identification and Reduction Plan to be submitted to Ohio EPA by May 11, 2011. Order no. 5 will be discussed in a separate letter. Order no. 6 cannot be evaluated yet. Order no. 7 has been superceded by the reissuance of the NPDES permit with continuation of the 1.0 TUa limit. Order no. 8 will be discussed in a separate letter. Ahlstrom is in compliance with order no. 9 and 10. Order no. 11 is not applicable.

Please be advised that failure to comply with the Administrative Orders issued to Ahlstrom may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.





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
11A00010*JD	OH0045322	7/27/2011	C	S	Industrial

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ahlstrom West Carrollton LLC 1 South Elm Street West Carrollton, Ohio	9:00 am	June 1, 2011
	<b>Exit Time</b>	<b>Permit Expiration Date</b>
	10:20 am	May 31, 2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Brandon Carpenter, Technical Director	(937) 859-3621	
Name, Address and Title of Responsible Official	Phone Number	
Len Levy, Plant Manager 1 South Elm Street P.O. Box 49098 West Carrollton, Ohio 45449-0098	(937) 247-1247	

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	N	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
 Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
8/24/2011 Date	8/24/2011 Date



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) Do Categorical Standards apply?...If yes, list applicable standards.. N
- (d) Product(s) and production rates conform with permit application (Industries)..... N/A
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... Y
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

The NPDES Permit was renewed on May 11, 2011.

**Section F: Compliance**

- (a) Any significant violations since the last inspection ..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...Administrative Orders
- (f) Permittee is in compliance with schedule..... N
- (g) Has biomonitoring shown toxicity in discharge since last inspection Y

Comments/Status:

See Summary of Findings for compliance review.



**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

(a) Standby power available.....generator  or dual feed ..... N

i. What does the back-up power source operate.....

ii. How often is the generator tested under load.....

(b) Which components have an alarm system available for power or equipment failures.....

pH meter

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... N

(e) Any major equipment breakdown since last inspection..... Y

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:

e) mixer blades broken & repaired in July 2011.



**Section H: Sludge Management**

Not applicable to this industry

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary/Secondary flow measuring devices operated and maintained..... Y  
Type of device (e.g. weir with ultrasonic level sensor):
- (b) Calibration frequency adequate ..... Y
- (c) 24-hour recording 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 one parchment machine 3 shifts per day, 5-7 days per week.

**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) 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

**Comments/Status:**



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

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite.... N
- (b) Do SOP's include the following if applicable:
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and Preservation
  - Interferences
  - Apparatus and Materials
  - Reagents
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. N/E (see score from GLC page)
- (h) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: Everything except pH and temperature  
Lab name: Belmont Park, EnviroScience

*Discharge Monitoring Report Quality Assurance (DMRQA)*

- (a) Participation in latest USEPA quality assurance performance sampling..... Y  
Date: Study 30, Sept. 2010
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

**Comments/Status:**

See Summary of Findings.



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

**Outfall # 001**

Outfall Description: Sampling station 001 observed at parshall flume located in crawl space under building. Nothing unusual noted.

Receiving Stream: Owl Creek

Receiving Stream Description: Outfall area and downstream showed excessive bacteria/fungal growth (similar to previous summer). No photos taken.

**Comments/Status:**

Upstream from outfall location on receiving stream was dry during the inspection. Noted a lot of junk in the creek which is the result of storm water washing solid waste down the creek from unknown dumping areas.

**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:**

