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4IA00001C

State of Ohio Environmental Protection Agency

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**Certified Mail #91 7108 2133 3932 4449 4463**

May 21, 2010

Jeffrey Peters/General Manager  
Ohio Paperboard  
310 Water Street  
Baltimore, OH 43105-1272

Dear Mr. Peters:

Attached is a report for a Compliance Evaluation Inspection that Greg Sanders and I from this office performed at the wastewater treatment plant (WWTP) serving your facility. Mr. Patrick Wersell and Mr. Kevin McMunn of your staff accompanied us during this inspection.

It was good to see work underway to improve this WWTP and to hear that additional improvements are scheduled for 2010. However, it is disappointing that there were a significant number of wastewater discharge permit effluent limitations violations since October 2009. The violations continued through March 2010 and were reported as resolved in April 2010. Effluent limitations violations are listed in Attachment "D" of this report.

These violations will likely result in Ohio Paperboard being categorized as a facility in significant noncompliance with its wastewater discharge permit. Because of these violations this wastewater treatment system must receive additional attention from this office to make sure problems are being addressed and measures taken to prevent violation recurrence.

With this in mind it is very important that you make every effort to ensure that issues referenced in this report are addressed. The more notable issues include the following:

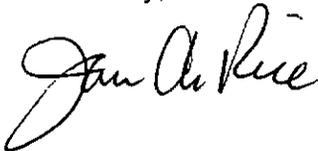
1. Paper Mill Operations that threaten consistent wastewater discharge permit compliance must cease. This problem regarding the impact of variable wastewater discharge from the mill has been referenced in past inspection reports. It is my understanding that this problem is currently under review by MACTEC Engineering and Consulting, Inc.. Please advise this office in writing regarding outcome of this review when it becomes available.

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

2. Your WWTP operator's primary focus should be in managing the WWTP so that it can maintain consistent wastewater discharge permit compliance. Over-tasking operators with work not related to WWTP management may result in noncompliance and increased scrutiny from this office in response to violations.
3. Advise this office in writing as soon as possible regarding a plan to maintain compliance with outfall 4IA00001002 requirements. Attachment "E" lists dates on which noncompliance occurred at outfall 4IA00001002.
4. Odors have been at times very strong near the primary treatment ponds and have resulted in residents' complaints being filed with this office. A portion of the MACTEC evaluation will focus on work necessary to control odors. Please advise this office in writing regarding outcome of the MACTEC evaluation when it becomes available.
5. Complete the aeration/sludge holding pond embankment improvement project in 2010.
6. Complete the old scrubber pond abandonment project in 2010.

If you have questions regarding this report I can be contacted by telephone at 614-728-3850 or by e-mail at [jan.rice@epa.state.oh.us](mailto:jan.rice@epa.state.oh.us).

Sincerely,



Jan A. Rice  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Ohio EPA/Central District Office

c: Kevin McMunn, Technical Director  
- Patrick Wersell, Wastewater Treatment Plant Manager

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

<b>Permit No.</b> 4IA00001*HD	<b>NPDES No.</b> OH0004961	<b>Date</b> 4/21/10	<b>Inspection Type</b> C	<b>Inspector</b> S	<b>Facility Type</b> 2
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**B. FACILITY DATA**

<b>Name and Location of Facility Inspected</b>	<b>Entry Time</b>	<b>Permit Effective Date</b>
Newark Group Industries dba Ohio Paperboard Wastewater Treatment Plant (WWTP) West Rome Street, Baltimore, Ohio	9:00 A.M.	8/1/04
	<b>Exit Time</b>	<b>Permit Expiration Date</b>
	12:30 P.M.	7/31/09

<b>Name(s) and Title(s) of On-Site Representative(s)</b>	<b>Phone Number(s)</b>
Patrick Wersell, WWTP Manager	740-862-3579
<b>Name(s) and Title(s) of Operator of Record</b>	<b>Phone Number(s)</b>
<b>Name, Address and Title of Responsible Official</b>	<b>Phone Number</b>
Jeffrey Peters/General Manager, 310 Water Street, Baltimore, Ohio 43105-1272	740-862-4167

**C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)**

<u>S</u>	Permit
<u>S/S</u>	Records/Reports
<u>S/M</u>	Operations & Maintenance – maintenance is improving but remains marginal since work not yet started on pond embankment stabilization project. This work is scheduled to occur in summer 2010.
<u>M</u>	Facility Site Review – marginal since work not yet started on pond embankment stabilization project.
<u>N</u>	Collection System
<u>S</u>	Flow Measurement
<u>S</u>	Laboratory
<u>U/S</u>	Effluent/Receiving Waters – effluent rated unsatisfactory due to infrequent effluent violations. The permittee must ensure that its wastewater superintendent has sufficient time to obtain consistent compliance from its wastewater treatment system.
<u>S/N</u>	Sludge Storage/Disposal
<u>N</u>	Pretreatment
<u>S</u>	Compliance Schedules
<u>S</u>	Self-Monitoring Program

**D. SUMMARY OF FINDINGS/COMMENTS:** The permittee is working to improve its wastewater treatment system which is comprised of treatment ponds, some of which were built in the 1950's, and an activated sludge treatment plant constructed early in the 1990's. An increasingly larger portion of treated wastewater is recycled to the mill for reuse. The remaining portion of treated wastewater is discharged to Zellerbach Tributary. Work will be underway in summer 2010 for stabilization of an embankment between the aeration and sludge holding pond and for improving the aeration pond exterior embankment. Work will also be underway in summer 2010 to abandon what is known as an old scrubber pond located between the north and south final settling ponds.

The wastewater discharge permit for this facility authorizes flow augmentation and requires that a minimum of 0.40 million gallons per day of well water be discharged into West Branch Paw Paw Creek whenever there is a discharge from the wastewater treatment system.

Jan Rice  
Jan Rice, Inspector, Ohio EPA, Central District Office

Erin Sherer  
Erin Sherer, Reviewer, Ohio EPA, Central District Office

5/21/10  
Date

5-24-10  
Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

### 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:** \*e. a process flow diagram from the wastewater discharge permit renewal application is included as Attachment "A" in this report. The superintendent indicated that paper mill process wastewater now routed through the Krofta Clarifier has been increased to 95% to further reduce the pollutant load delivered to the treatment ponds and activated sludge treatment plant.

\*h. the permittee has installed groundwater monitoring wells between its closed landfill and several of its WWTP ponds (see Attachment "B"). One of the wells is labeled US 1-22. A map showing the location of US 1-22 is included as Attachment "C" in this report. The permittee and the Ohio EPA Division of Drinking and Ground Water (DDAGW) concur that water quality in US 1-22 is primarily controlled by leaking unlined lagoons. The wastewater discharge permit for this WWTP applies only to surface water discharges, not ground water discharges. Pond leakage into ground water is an unpermitted activity and, as such, is an illegal discharge to waters of the state. The permittee plans for removal in 2010 of what is known as an unused old scrubber pond located between the north and south final settling ponds east of well US 1-22. In a letter dated September 19, 2008, this office advised the permittee that sludge in the old scrubber pond should be removed and the pond then filled with suitable material. A DDAGW memorandum attached to the September 19, 2008, letter indicated that removal of the old scrubber pond should greatly reduce the effects of that pond on ground water and allow a clearer evaluation of adjacent ponds being actively used at the site.

### 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 permit	*X			
e. Permittee is meeting compliance schedule	*X			

**Comments:** \*a. Attachment "D" lists effluent limitations violations. Continued violations are unacceptable. The superintendent indicated that in April 2010 the WWTP returned to compliance with its final effluent limitations. Attachment "E" lists dates on which flow augmentation well water discharge was less than 0.40 MGD. The permittee must discharge at least 0.40 MGD whenever there is a discharge from the WWTP. The permittee must advise this office in writing as soon as possible regarding its plan to maintain compliance with outfall 41A00001002 requirements.

**\*d and e.** the schedule required compliance with final effluent limitations for Residue, Total Dissolved. A letter from the permittee dated August 15, 2005, indicates compliance with the Residue, Total Dissolved final effluent limitation had been achieved. Review of discharge monitoring reports submitted by the permittee shows compliance with the final effluent limitation for this parameter.

Part II, Item I in this wastewater discharge permit contains final effluent limitations for Strontium. Item I allowed the permittee to evaluate use of alternative strontium limits in place of those included in Item I. The permittee submitted its evaluation of alternative strontium limits to Ohio EPA. The evaluation was reviewed by Ohio EPA during renewal of the permit in 2010.

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated and Maintained	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: # of shifts 1 Days/Week 5 with weekend checks	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 Number _____			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		*X		

**Comments: \*a.** loss of power in the area would affect the mill as well as the WWTP. If the paper mill loses power then no process wastewater is discharged to the wastewater treatment system.

**\*b.** as was mentioned in the last inspection report an alarm system connected to critical components should be installed. The activated sludge plant primary and return pumps as well as the aeration blower should be connected into the alarm system. Work in progress to resolve this problem will be partially completed by May 2010.

**\*c.** the superintendent indicated the Marx clarifier is no longer needed for wastewater treatment and is now being used as a surge tank. All six floating aerators in the aeration lagoon were functioning at the time of this inspection.

**\*e.** the superintendent is certified as a Class III wastewater treatment plant operator. The wastewater discharge permit will, when it is renewed, require WWTP oversight by a Class II operator. The superintendent indicated that work is underway to locate a back-up operator who would be available as needed. The permittee must ensure that its wastewater superintendent has sufficient time to obtain consistent compliance from its wastewater treatment system. Paper Mill activities must not interfere with the superintendent's responsibility to operate the WWTP in the most efficient fashion possible. Continued violations are unacceptable.

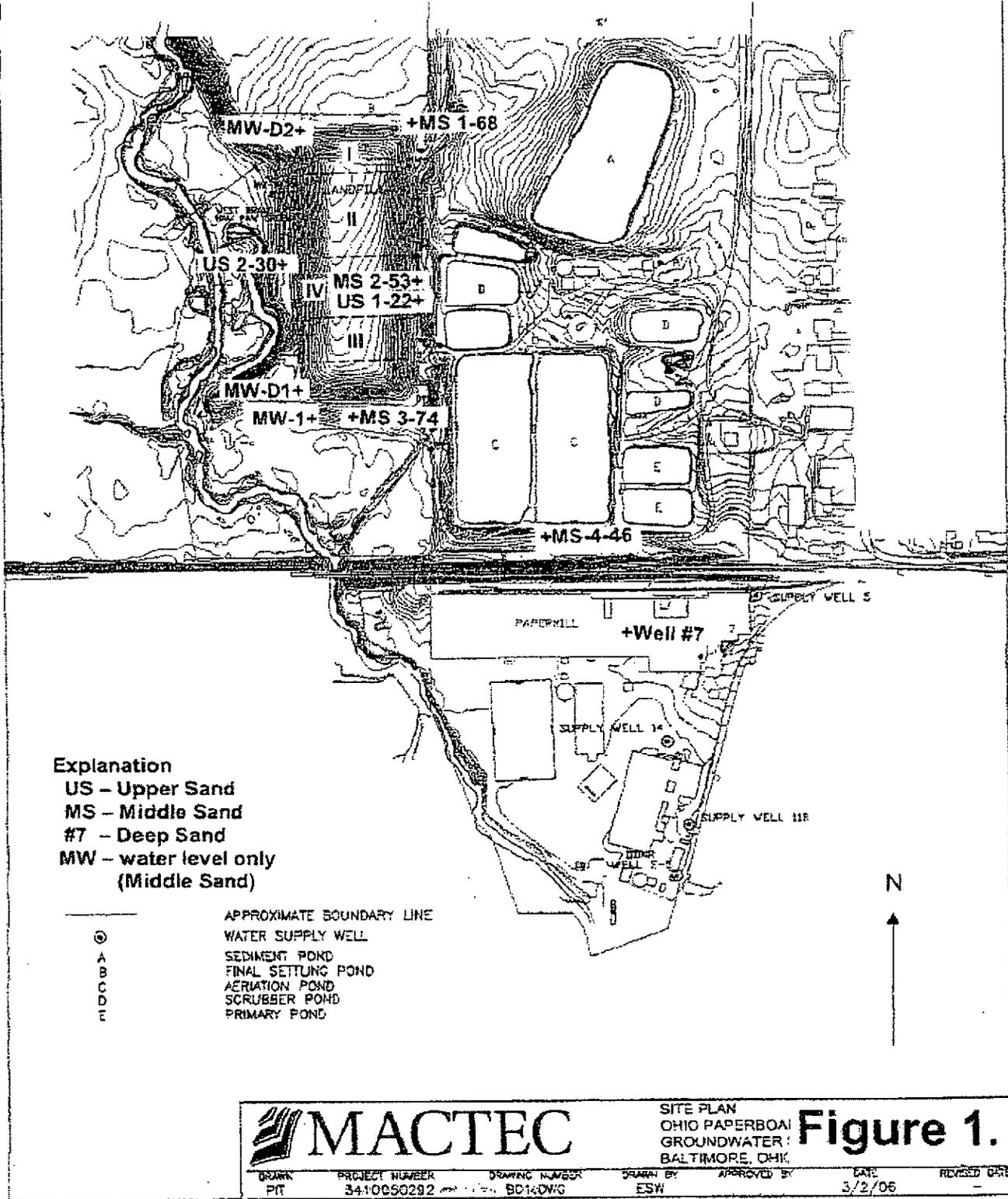
**\*f.** routine and preventative maintenance is rapidly continuing to improve. The superintendent indicated that 100% of the activated sludge plant aeration tank air diffusers had been replaced and that an automatic waste activated sludge wasting valve has been installed to improve treatment efficiency. A variable frequency drive (VFD) has been installed on the return sludge pumps in the activated sludge plant. The VFD replaced a valve that was prone to plugging. The plant aeration blowers have been re-wired so that if one fails, the other will now start automatically. In 2010 an emergency alarm will be connected to critical activated sludge plant components. Stabilization of several lagoon embankments is scheduled in summer 2010.

**\*h.** the superintendent indicated that several notebooks listing the treatment system components had been prepared for use as part of the O&M Manual. Work is continuing on the O&M Manual and will reference any treatment system updates.









Attachment "D"  
 Effluent Limitations Violations  
 Newark Group Industries dba Ohio Paperboard  
 Outfall Monitoring Station 4IA00001001 (4/1/09 – 3/31/10)

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4IA00001*HD	October 2009	001	00310	Biochemical Oxygen Dem	30D Qty	27	32.8893	10/1/2009
4IA00001*HD	October 2009	001	00310	Biochemical Oxygen Dem	1D Qty	41	45.6524	10/27/2009
4IA00001*HD	October 2009	001	00310	Biochemical Oxygen Dem	1D Qty	41	43.7543	10/28/2009
4IA00001*HD	January 2010	001	00310	Biochemical Oxygen Dem	30D Qty	117	158.439	1/1/2010
4IA00001*HD	January 2010	001	00310	Biochemical Oxygen Dem	1D Qty	175	435.409	1/17/2010
4IA00001*HD	January 2010	001	00310	Biochemical Oxygen Dem	1D Qty	175	179.775	1/20/2010
4IA00001*HD	February 2010	001	00310	Biochemical Oxygen Dem	30D Qty	117	179.314	2/1/2010
4IA00001*HD	February 2010	001	00310	Biochemical Oxygen Dem	1D Qty	175	203.833	2/11/2010
4IA00001*HD	February 2010	001	00310	Biochemical Oxygen Dem	1D Qty	175	226.212	2/12/2010
4IA00001*HD	March 2010	001	00310	Biochemical Oxygen Dem	30D Qty	54	253.829	3/1/2010
4IA00001*HD	March 2010	001	00530	Total Suspended Solids	1D Conc	355	720.	3/4/2010
4IA00001*HD	March 2010	001	00530	Total Suspended Solids	1D Qty	403	732.806	3/4/2010
4IA00001*HD	March 2010	001	00530	Total Suspended Solids	1D Conc	355	420.	3/5/2010
4IA00001*HD	March 2010	001	00530	Total Suspended Solids	1D Qty	403	657.976	3/5/2010
4IA00001*HD	March 2010	001	00310	Biochemical Oxygen Dem	1D Qty	82	391.067	3/12/2010
4IA00001*HD	March 2010	001	00310	Biochemical Oxygen Dem	1D Qty	82	505.579	3/13/2010
4IA00001*HD	March 2010	001	00310	Biochemical Oxygen Dem	1D Qty	82	136.939	3/18/2010
4IA00001*HD	March 2010	001	00310	Biochemical Oxygen Dem	1D Qty	82	266.756	3/19/2010
4IA00001*HD	March 2010	001	00310	Biochemical Oxygen Dem	1D Qty	82	147.168	3/25/2010

Attachment "E"  
 Well Water Discharge Violations. The permittee must discharge at least 0.40 MGD whenever there is a discharge from the WWTP.  
 Newark Group Industries dba Ohio Paperboard  
 Outfall Monitoring Station 4IA00001002 (4/1/09 – 3/31/10)

Facility	Permit No	Station	Reporting Code	Parameter	Units	Date	Reported Value	A Code	Comments
Ohio Paperboard Corp	4IA00001*HD	2	50050	Flow Rate	MGD	11/23/2009	0.298		
Ohio Paperboard Corp	4IA00001*HD	2	50050	Flow Rate	MGD	3/9/2010	0.157		
Ohio Paperboard Corp	4IA00001*HD	2	50050	Flow Rate	MGD	3/10/2010	0.132		
Ohio Paperboard Corp	4IA00001*HD	2	50050	Flow Rate	MGD	3/11/2010	0.304		
Ohio Paperboard Corp	4IA00001*HD	2	50050	Flow Rate	MGD	3/15/2010	0.333		

