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State of Ohio Environmental Protection Agency

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May 27, 2009

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

Dear Mr. Peters:

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

It was good to see maintenance of this WWTP is improving and that continued improvements are planned for 2009. Continued improvements should focus on the earth embankment around the aeration pond as well as the embankment between the sludge holding and aeration pond.

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.

Sincerely,

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

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

JAR/nsm OhioPaperboard 4-23-09CElcovtr

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



NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|------------|-----------|---------|-----------------|-----------|---------------|
| 4IA00001 | OH0004961 | 4/23/09 | C | S | 2 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Newark Group Industries dba Ohio Paperboard Wastewater Treatment (WWTP) West Rome Street, Baltimore, Ohio | 9:00 A.M. | 8/1/04 |
| | Exit Time | Permit Expiration Date |
| | 11:00 A.M. | 7/31/09 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|--|-----------------|
| Patrick Wersell, WWTP Manager | 740-862-3579 |
| Name(s) and Title(s) of Operator of Record | Phone Number(s) |
| | |
| Name, Address and Title of Responsible Official | Phone Number |
| 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)

- S Permit
- S/S Records/Reports
- S/M Operations & Maintenance – maintenance is improving but remains marginal since work not yet started on pond embankment stabilization project. This work is planned for 2009.
- M Facility Site Review – marginal since work not yet started on pond embankment stabilization project.
- N Collection System
- S Flow Measurement
- S Laboratory
- M/S Effluent/Receiving Waters – marginal due to infrequent effluent violations.
- S/N Sludge Storage/Disposal
- N Pretreatment
- S Compliance Schedules
- S Self-Monitoring Program

D. SUMMARY OF FINDINGS/COMMENTS: The permittee is continuing improvement of 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. A portion of wastewater discharged from the paper mill is treated for reuse in the mill. The remaining portion is routed through the treatment system prior to discharge to Zellerbach Tributary. Work may soon be underway for stabilization of an embankment between the aeration and sludge holding pond and for improving the aeration pond exterior embankment. Work may also soon be underway to abandon what is known as an old scrubber pond located between the north and south final settling ponds.

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

5/27/09
Date

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

5/28/09
Date

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.

*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 2009 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.

*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. Ohio EPA will inform the permittee during the permit renewal process regarding strontium monitoring/limitations which may be necessary.

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. since the last inspection the permittee has completed upgrading electrical service in the transformer building which distributes power to the WWTP.

*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.

*c. the superintendent indicated the Marx clarifier is no longer needed for wastewater treatment and is now used as a water storage tank. One of the six floating aerators in the aeration lagoon is out of service and being repaired. Another aeration unit is scheduled for service in the near future.

*e. the wastewater discharge permit for this facility does not currently require that the wastewater treatment system be overseen by a certified wastewater operator. The Ohio Administrative Code 3745-7-04 Item (B) 3 (c) indicates that an industrial water pollution control facility that is operated as an activated sludge treatment works may be classified by the Ohio EPA. An activated sludge treatment works means a treatment works that produces an activated mass of microorganisms capable of stabilizing waste aerobically. The Permit to Install (Application No.:01-2502; effective March 19, 1990) indicates that the package plant portion of the treatment system is an activated sludge treatment plant. The wastewater discharge permit will, when renewed, classify this treatment works as a Class I facility. The superintendent is certified as a Class III wastewater treatment plant operator.

*f. routine and preventative maintenance is improving but work remains necessary. The superintendent indicated that approximately 50% of the activated sludge plant aeration tank air diffusers had been replaced and that an automatic waste activated sludge wasting valve had been installed to improve treatment efficiency. Stabilization of several lagoon embankments is scheduled in 2009.

*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 should continue on the O&M Manual to include information regarding treatment system operation.

| 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 overflow (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:

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): _____ 3/94 Submitted Date
 _____ 01-053-IW Approval Number
 _____ Not submitted
 _____ N/A

| | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| b. Sludge Management Plan current | | *X | | |
| c. Sludge adequately disposed (Method: Land application) | X | | | |
| d. If sludge is incinerated, where is ash disposed of? _____ | | | X | |
| e. Is sludge disposal contracted (Name: Burch Hydro) | 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: *b. the wastewater discharge permit will, when renewed, require submittal of an updated Sludge Management Plan. The superintendent indicated that two years ago sludge was removed from the south primary pond. Since then Burch Hydro has remove sludge from the sludge holding pond. Sludge is scheduled to be removed again in two years.



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