



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 Korleski, Director

July 15, 2009

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 9, 2009, I met with Brandon Carpenter to inspect the wastewater treatment system at Ahlstrom West Carrollton and the discharge to Owl Creek. A couple of our summer interns were also present for this inspection. Attached is a copy of my Compliance Evaluation Inspection Report regarding compliance with the NPDES Permit. A photo log is also attached showing the visual water quality standard violations in Owl Creek.

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 proceeding. A response to this inspection regarding the additional TDS data is requested by July 31, 2009. 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

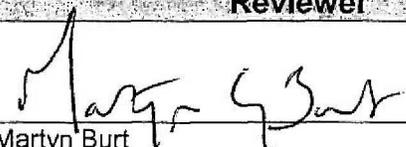
| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 11A0010*ID | OH0045322 | 7/9/2009 | Compliance | State | Industrial |

| 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 | 8:30 am | August 1, 2008 |
| | Exit Time | Permit Expiration Date |
| | 10:00 am | June 30, 2007 |
| 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 | |
| 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 |
|--|--|
|  7/15/09 |  7/15/09 |
| Mary Osika Environmental Specialist Division of Surface Water Southwest District Office | Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office |

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..... Y
- (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:

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

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, 2 shifts. They are also doing some weekend shifts. Only one parchment line is being used.

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..... N
 - (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: Study 28 - August, 2008

Comments/Status:

(c,d) TDS analyses are done more frequently, 2/week. This data needs to be reported on the DMRs.

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:

Summary of Findings/Comments

The facility's production rate is down due to the economic downturn. The facility is running one parchment line now, 2 shifts per day, 5 days a week. They occasional run shifts during the weekend also. The average daily flow rate from the facility to Owl Creek during the review period is approximately 0.800 MGD. The flow rate has dropped to 0.700 MGD when the production decreased in February 2009.

The facility is collecting data on the TDS at outfall 001 more frequently than required by the permit. The facility has been monitoring TDS at 2/week for the past few months. The permit frequency is 1/month. This monitoring data must be submitted to Ohio EPA in amended DMR reports. A response is needed regarding when this data will be submitted.

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 2008 through June 2009. Twenty two (22) exceedances are listed during the review period.

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.

On October 28, 2008, Ohio EPA sent Ahlstrom a set of proposed Director's Findings and Orders in order to address the non-compliance of the NPDES permit for this facility.

NOTICE OF VIOLATION

PERMIT LIMIT EXCEEDANCES AT OUTFALL 001 FROM JULY 2008 – JUNE 2009

| <u>Parameter</u> | <u>Date</u> | <u>Permit Limit</u> | <u>Value Reported</u> |
|---|-------------------|--------------------------|-----------------------------------|
| Residue, Total Dissolved (monthly average) | July 2008 | 1500 mg/l 3974 kg/day | 3740 mg/l 12499 kg/day* |
| Residue, Total Dissolved (monthly average) | Aug. 2008 | 1500 mg/l 3974 kg/day | 2600 mg/l 8817 kg/day* |
| Residue, Total Dissolved (monthly average) | Sept. 2008 | 1500 mg/l 3974 kg/day | 3040 mg/l 10608 kg/day* |
| Copper, Total Recov. (monthly average) | Sept. 2008 | 0.066 kg/day | 0.076 kg/day* |
| Residue, Total Dissolved (monthly average) | Oct. 2008 | 1500 mg/l 3974 kg/day | 2980 mg/l 9801 kg/day* |
| Copper, Total Recov. (monthly average) | Oct. 2008 | 0.066 kg/day | 0.076 kg/day* |
| Residue, Total Dissolved (monthly average) | Nov. 2008 | 1500 mg/l 3974 kg/day | 3070 mg/l 10736 kg/day |
| Residue, Total Dissolved (monthly average) | Dec. 2008 | 1500 mg/l 3974 kg/day | 2800 mg/l 9474 kg/day* |
| Residue, Total Dissolved (monthly average) | Jan. 2009 | 1500 mg/l 3974 kg/day | 3200 mg/l 11009 kg/day* |
| Residue, Total Dissolved (monthly average) | Feb. 2009 | 1500 mg/l 3974 kg/day | 1550 mg/l 4511 kg/day* |
| Residue, Total Dissolved (monthly average) | Mar. 2009 | 1500 mg/l 3974 kg/day | 1980 mg/l 5459 kg/day* |
| Residue, Total Dissolved (monthly average) | May. 2009 | 1500 mg/l 3974 kg/day | 1800 mg/l 5423 kg/day* |

* loads are calculated based on concentration and flow rate.

Permit exceedences highlighted in **bold** also exceed the Wasteload Allocation calculated at 2907 mg/l for Residue, Total Dissolved.

Photo Log – Ahlstrom West Carrollton's discharge to Owl Creek – July 9, 2009



Photo taken by Mary Osika, Division of Surface Water

Outfall 11A00010001



Photo taken by Mary Osika, Division of Surface Water

50 feet dstm outfall 001

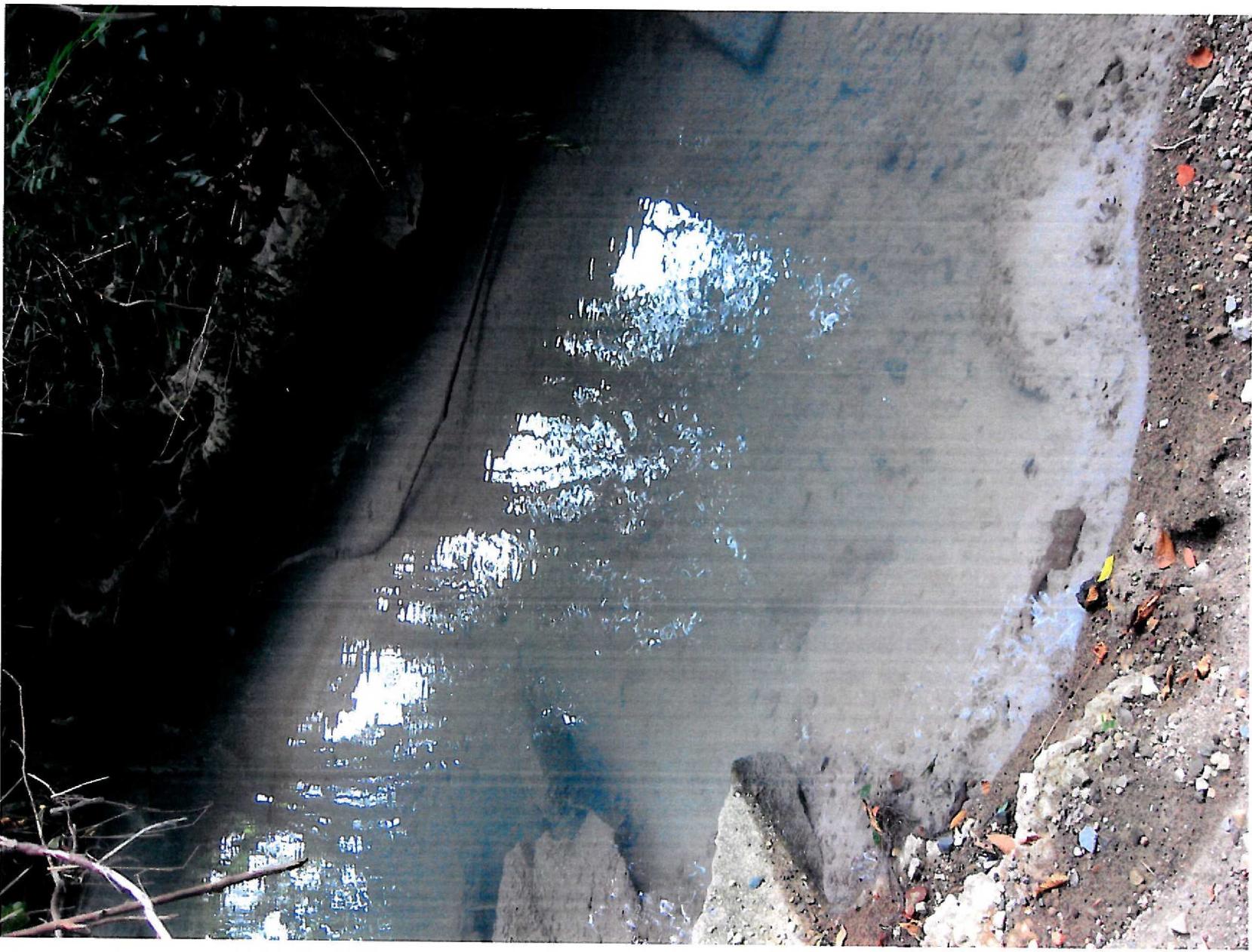


Photo taken by Mary Osika, Division of Surface Water

60 ft dstm outfall 001



Photo taken by Mary Osika, Division of Surface Water

50 ft upstrm outfall 001