



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

August 28, 2009

Re: Coshocton County
Smurfit-Stone Container
Coshocton Mill
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Joseph Bulzan, Environmental Manager
Smurfit-Stone Container Enterprises, Inc.
500 North Street
Coshocton, Ohio 43812

Dear Mr. Bulzan:

On August 12, 2009, I conducted a Compliance Evaluation Inspection at the Smurfit-Stone Container Enterprises, Inc. - Coshocton Mill in Coshocton County. The purpose of the inspection was to determine the compliance status with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 01A00005*LD and evaluate the wastewater treatment systems performance. The facility seemed to be operating in compliance.

We received self-monitoring reports covering the months of August 2007 through July 2009 for the referenced facility. Our review indicated the following limit violations of your NPDES permit.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00400	pH	1D Conc	9.0	9.3	10/18/2007
004	00400	pH	1D Conc	9.0	9.2	10/18/2007
004	00400	pH	1D Conc	9.0	9.3	7/10/2009
004	00400	pH	1D Conc	9.0	9.5	6/9/2009

The above violations were followed up with correspondence describing the incidents. The high pH values are described as often attributable to the City water supply's pH which is sometimes elevated above 9.0.

You also reported an incidental plant bypass due to power failure on April 6, 2008 where primary effluent discharged at outfall 004 upon overflowing the primary clarifier. An estimated 17,500 gallons was discharged before the system was relieved by the emergency diesel pump.

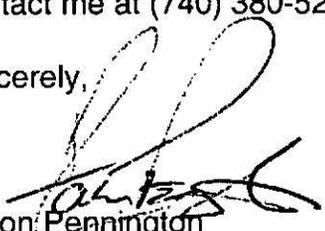
During the inspection, we spoke briefly regarding the draft TMDL for Tuscarawas River and also Operator Certification rules. I sent a follow up e-mail with links to the aforementioned documents. If there are any additional questions with those documents, please contact me and/or others. Additionally, we spoke about the dilution water for use with the WET testing whereas the lab was using Scioto River water and perhaps your facility may want to look into providing upstream Tuscarawas River water.

I noted the Bacteria acceleration chamber unit was added in January 09 and blended to feed into the primary effluent. Additionally, the lagoons are fed with this seed stock in various locations to help maintain the system. We also noted that in Lagoon 1 there was a splash surface mixer down for repair and in Lagoon 2 submersible mixers A, G, and H were in need for repair/maintenance.

We are in receipt of the Pollutant Minimization Program for Mercury that was dated May 27, 2009. I will again offer that determining/approximating the flow rates will be critical to determine a mass balance for mercury. From the data, the scrubber bleed and subsequent carbonate tank are of key interest. Another Mercury data point that I believe would be of key interest, and I confess I don't know the testing procedure implications - would be to take a filtered 003 effluent sample concurrently to a non-filtered 003. If the testing procedure is still credible upon being filtered; it should help determine the relationship of effluent TSS with effluent Hg which could provide some insight into how to minimize mercury in the 003 effluent.

A copy of our inspection report is enclosed. The assistance and cooperation received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AP/dh

Enclosure

c: Dan Truett, General Manager, Smurfit-Stone Container

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IA00005*LD	OH0004235	August 12, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Smurfit-Stone Container Enterprises, Inc. Coshocton Mill 500 North 4th Street Coshocton, Ohio 43812	~9:30 a.m.	August 1, 2008
	Exit Time	Permit Expiration Date
	~2:50 p.m.	July 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Joseph Buizan, Environmental Manager	(740) 622-6543, Ext. 238
Randy Hothem, Technical Services Manager	(740) 622-6543
Name, Address and Title of Responsible Official	Phone Number
Dan Truett, General Manager Smurfit-Stone Container Enterprises, Inc. 500 N. Fourth Street Coshocton, Ohio 43812	

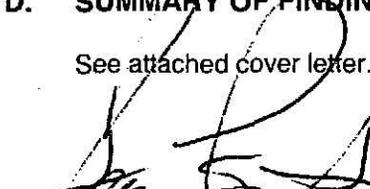
C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>NA</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>M</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>NA</u> Sludge Storage/Disposal	<u> </u> Other
<u>NA</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated, NA = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS

See attached cover letter.



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

8-24-09

Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

8/31/09

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 ~845tons/day in '08	X			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application	X			
f. New treatment process(es) added since last inspection - (added seed stock tank)		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			

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:			X	
e. Permittee is meeting compliance schedule			X	

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available:			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:	X			
e. Operator holds unexpired license of class required by permit Class: There is a Class I			X	
f. Routine and preventive maintenance schedule/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		

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 (6" portable Diesel pump)	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	

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 X N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current			X	
c. Sludge adequately disposed - sent to boiler	X			
d. If sludge is incinerated, where is ash disposed of? landfill	X			
e. Is sludge disposal contracted (Name:)			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 - dewatering & incinerated	X			

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: <u> X </u> ultrasonic & parshall flume _____ at 002 & 004 _____ weir _____ ultrasonic & weir _____ calculated from influent _____ Other <u> X </u> Magmeter at 003	X			
b. Calibration frequency adequate - 1/yr (during annual outage mid-July 2009)	X			
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: _____ X _____ Daily _____ Weekly _____ Monthly _____ Other				

