



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

August 11, 2009

Re: Jefferson County
Valley Converting Company, Inc.
Compliance Sampling Inspection
Correspondence (IWW)

Mr. Michael Biasi, President
Valley Converting Co., Inc.
P.O. Box 279
Toronto, Ohio 43694

Dear Mr. Biasi:

On May 11-12, 2009, I conducted a Compliance Sampling Inspection(CSI) at Valley Converting. The purpose of the inspection was to determine your compliance status with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number OIA00006*GD and to evaluate the wastewater treatment systems performance. During the inspection, the sampling results indicated that the plant was exceeding the limits established for monthly average limits and operating near maximum limits for Total Suspended Solids and Five-day Biochemical Oxygen Demand. A follow up inspection was conducted on July 21, 2009 to see recent treatment plant repairs/improvements. The plant performance on July 21 appeared drastically superior to the performance which occurred during the CSI.

The following are the reported violation(s) since July 1, 2007:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00310	Biochemical Oxygen Dem	30D Qty	192	209.037	3/1/2008
001	00400	pH	1D Conc	6.5	6.4	8/17/2008
001	00400	pH	1D Conc	6.5	6.4	7/28/2008
001	00310	Biochemical Oxygen Dem	30D Qty	116	116.755	11/1/2008
001	00310	Biochemical Oxygen Dem	1D Qty	267	310.468	4/9/2008
001	00310	Biochemical Oxygen Dem	1D Qty	267	277.251	4/29/2008
001	00310	Biochemical Oxygen Dem	30D Qty	192	245.400	4/1/2008
001	00310	Biochemical Oxygen Dem	1D Qty	267	345.411	2/6/2008
001	00310	Biochemical Oxygen Dem	30D Qty	116	128.048	1/1/2009
001	00530	Total Suspended Solids	1D Qty	333	1201.81	5/14/2009
001	00530	Total Suspended Solids	1D Qty	333	647.265	5/15/2009
001	00530	Total Suspended Solids	30D Qty	167	195.370	5/1/2009
001	00530	Total Suspended Solids	1D Qty	333	376.986	6/26/2009
001	00310	Biochemical Oxygen Dem	1D Qty	231	303.670	6/24/2009
001	00310	Biochemical Oxygen Dem	30D Qty	116	180.509	6/1/2009

The permit issued for outfall 01A00006*GD requires the Owner to report noncompliance as directed by Part III.12.E of the permit which shall contain information listed in Part III.12.B and Part III.12.C. Valley Converting is reporting noncompliance as required by permit.

The following items were addressed between 8-6-07 and 5-11-09:

- A V-notch weir was added for the purpose of flow monitoring. The system appears to be adequate. The permittee will need to maintain the calibration of the ultrasonic meter for daily flow monitoring requirements in the NPDES permit. Keep a log of calibration dates with any relative notes.
- BOD₅ tests are now being seeded.
- A new refrigerated sampler has been purchased by the permittee.

The following additional items were accomplished between 5-12-09 and 7-21-09:

- The clarifier weir trough has been replaced to prevent solids pass through.
- The Drive Motor for the clarifier rake system has been fitted with a variable frequency drive to maintain a proper rotational speed. This results in higher solids removal.
- Additional measures were taken internally at the paper machine end of the plant to control the amount of flow diverted to the wastewater treatment plant.

The Owner stated that they were pursuing adding additional screening ahead of the wastewater treatment plant.

Results from the split sampling event are attached in Table I (Field Data) and Table II Compliance Sampling Data (Lab Data) (the plant was in distress during the CSI, thus the removal percentages for TSS and BOD were very limited). Most pollutants with the exception to the Influent TSS sample were reported at 70-90% of the value of the Ohio EPA lab results. Please explain this discrepancy.

A few remnants of the "Boneyard" are located adjacent to the treatment facility and appear to be the only stormwater exposure source noted during the inspection. Please consider placing a tarp over the remaining objects. Information regarding Ohio EPA's stormwater "no exposure" can be found at:

http://www.epa.state.oh.us/dsw/storm/ind_noexp_cert.html

I have attached the form associated with "no exposure" certification; the link above includes where to submit it. Please send a copy to the Southeast District office to my attention. In the event that the "no exposure" certification does not apply, the facility would need to fulfill the requirements in Parts IV, V and VI in the permit.

Since the improvements performed in July 2009, the plant is reportedly currently operating in compliance. In the event BOD loadings do not maintain compliance with permit limits, I would suggest determining the Carbon:Nitrogen:Phosphorous ratio (C:N:P) of the wastewater. Paper mill wastewater typically is nutrient limited and requires supplemental nutrients, specifically nitrogen and phosphorous. Adding controlled supplemental nutrients should help bring down your loading numbers. Obviously getting the TSS loadings into compliance will assist in meeting your BOD limits, but if you have high soluble BOD then supplements would be the next step. If the C:N:P ratio looks good then there might be a source of toxicity.

A copy of our inspection report is enclosed along with Table I, Table II, "no exposure" form, and a V-notch reference chart. 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

AMP/dh

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IA00006*GD	OH0011738	May 11-12, 2009	S	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Valley Converting Co., Inc. 421 Loretta Avenue Toronto, Ohio 43694	10:30 a.m.	July 1, 2008
	Exit Time	Permit Expiration Date
	12:00 p.m.	June 30, 2013

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Michael Biasi, President Rich Brandt, Purchasing Agent Harry Crouch, provides sampling and lab analysis services	(740) 537-2152
Name, Address and Title of Responsible Official	Phone Number
Michael Biasi, President Valley Converting Co., Inc. P.O. Box 279 Toronto, Ohio 43694	(740) 537-2152

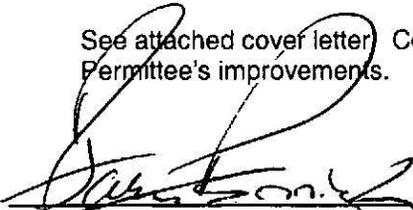
C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>U</u> Laboratory	<u>NA</u> Compliance Schedules
<u>U</u> Operations & Maintenance	<u>U</u> Effluent/Receiving Waters	<u>M</u> Self-Monitoring Program
<u>U</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; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

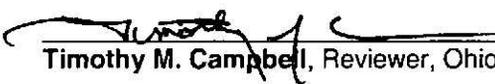
See attached cover letter. Cover letter also includes discussion from follow up inspection on 7/21/09 to see Permittee's improvements.



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

8-11-09

Date



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

8/12/09

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: *One of two machines in operation during inspection.

**Recent Loading Violations. Permittee recently replaced effluent meter.

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	

Comments: *TSS and BOD₅ Loading Violations.

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: No. of shifts: <u>3</u> Days/Week: <u>*</u>			X	
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			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 No. .			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X***			

Comments: *4d/W over last 2 months

**Effluent trough from clarifier in need of repairs, clarifier sludge rake drive motor is agitating the clarifier inhibiting settling.

***The treatment plant appeared to have a water balance issue especially for only running one of two machines.

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
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: Machine areas were relatively clean. Industrial operations are inclusively under roof. Raw and finished materials are stored under roof. Few remnants of the "Boneyard" remained since the previous inspection. The few remaining objects could be tarped and a "No Exposure Certification" could be signed to relieve the requirements of part IV, V, and VI.

L. SAMPLING PROCEDURES (FOR CSI'S)

- Grab samples obtained
- Composite obtained
- Compositing frequency: _____ Preservation: _____
- Flow proportioned sample obtained
- Automatic sampler used
- Sample split with permittee
- Chain of custody employed
- Sample obtained from facility sampling device
- Sample refrigerated during compositing: Yes No
- Sample representative of volume and nature of discharge: Yes _____

TABLE I

OHIO EPA FIELD DATA

FACILITY: Valley Converting, Jefferson County

DATES SAMPLED: May 11 & 12, 2009

<u>Station</u>	<u>Date</u>	<u>Time</u>	<u>Parameter</u>	<u>Units</u>	<u>Value</u>	<u>Permit Limits</u>
001	5/11	1205	pH	S.U.	7.56	6.5-9.0
			Temperature	°C	25.64	-
			Dissolved oxygen	mg/l	1.48	-
			Conductivity	umhos/cm	1354	-
001	5/12	1110	pH	S.U.	7.45	6.5-9.0
			Temperature	°C	28.96	-
			Dissolved oxygen	mg/l	0.94	-
			Conductivity	umhos/cm	1674	-

TABLE II

COMPLIANCE SAMPLING DATA

FACILITY: Valley Converting, Jefferson County

DATES SAMPLED: May 11-12, 2009

STATION	T*	PARAMETER	UNITS	<u>OHIO EPA</u>		<u>ENTITY</u>		<u>PERMIT LIMITS</u>	
				CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.
001									
	C	Susp. solids	mg/l	912	459	628	316	-	333
	C	BOD ₅	mg/l	320	161	281	141	-	231
	C	BOD ₂₀	mg/l	600	-	-	-	-	-
	C	BOD_Ult.	mg/l	610	-	-	-	-	-
	C	COD	mg/l	761	-	766	-	-	-
	G	Mercury, tot.	ug/l	<0.2	-	-	-	-	-
		Flow, tot.	MGD			0.133			
Influent									
	G	Susp. solids	mg/l	584	-	1176	-	-	-
	G	BOD ₅	mg/l	570	-	418	-	-	-
	G	BOD ₂₀	mg/l	830	-	-	-	-	-
	G	BOD_Ult.	mg/l	850	-	-	-	-	-
	G	COD	mg/l	1130	-	-	-	-	-

*SAMPLE TYPE: G=grab; C=composite

V-notch weir
 angle 90 degrees 1.570796 radians

$$Q = 8/15 C_d (2g)^{0.5} \tan(\Theta/2) H^{5/2}$$

Cd values vary based on H and Theta
 reference figure 4.18 in *Water Resources Engineering Chin* page 183

H= 4 inches 0.333333 feet
 Cd 0.593
 Q= 0.162815 cfs 73.07606 gpm

		Assume Cd = 0.581					Assume Cd = 0.6				
		GPM					GPM				
		Angle					Angle				
		22.5	30	45	60	90	22.5	30	45	60	90
H (inches)	H(feet)					degrees					
		0.392699	0.523599	0.785398	1.047198	1.570796	0.392699	0.523599	0.785398	1.047198	1.570796
2	0.166667	2.51758	3.391361	5.24259	7.307367	12.65673	2.599911	3.502266	5.414034	7.546334	13.07063
2.25	0.1875	3.379595	4.552556	7.037642	9.809395	16.99037	3.490115	4.701435	7.267789	10.13018	17.54599
2.5	0.208333	4.398032	5.924464	9.158427	12.76544	22.1104	4.541857	6.118207	9.457928	13.1829	22.83346
2.75	0.229167	5.581361	7.518492	11.62258	16.2001	28.05939	5.763884	7.764364	12.00267	16.72988	28.977
3	0.25	6.937636	9.345491	14.44688	20.13674	34.87785	7.164512	9.65111	14.91932	20.79525	36.01843
3.25	0.270833	8.474552	11.41583	17.64734	24.59769	42.60445	8.751689	11.78915	18.22445	25.40209	43.99771
3.5	0.291667	10.19949	13.73944	21.23934	29.60438	51.2763	10.53304	14.18875	21.93391	30.57251	52.95315
3.75	0.3125	12.11955	16.3259	25.23766	35.17743	60.92909	12.51589	16.8598	26.06299	36.32781	62.92161
4	0.333333	14.24158	19.18443	29.65657	41.33671	71.59728	14.70732	19.81181	30.6264	42.68851	73.93867
4.25	0.354167	16.57222	22.32397	34.50986	48.10146	83.31417	17.11417	23.05401	35.63841	49.67448	86.03873
4.5	0.375	19.11788	25.75315	39.81091	55.49032	96.11205	19.74307	26.59533	41.11282	57.30498	99.25513
4.75	0.395833	21.88479	29.48038	45.57271	63.52138	110.0223	22.60047	30.44445	47.06304	65.59868	113.6202
5	0.416667	24.87902	33.51383	51.80789	72.21226	125.0753	25.69262	34.6098	53.50212	74.57376	129.1655
5.25	0.4375	28.10649	37.86145	58.52873	81.58009	141.3009	29.02563	39.09961	60.44275	84.24794	145.9217
5.5	0.458333	31.57294	42.53101	65.74725	91.6416	158.7279	32.60545	43.92187	67.89733	94.63848	163.9187
5.75	0.479167	35.28401	47.53009	73.47515	102.4131	177.3847	36.43788	49.08443	75.87795	105.7622	183.1856
6	0.5	39.24519	52.86608	81.72388	113.9106	197.2989	40.5286	54.59492	84.39644	117.6357	203.751
6.25	0.520833	43.46187	58.54625	90.50465	126.1496	218.4976	44.88317	60.46084	93.46436	130.275	225.6429
6.5	0.541667	47.93931	64.57767	99.82844	139.1455	241.0072	49.50703	66.68951	103.093	143.6959	248.8886
6.75	0.5625	52.68267	70.96733	109.706	152.9133	264.8537	54.40551	73.28812	113.2936	157.9139	273.515
7	0.583333	57.69703	77.72203	120.1478	167.4677	290.0625	59.58385	80.26371	124.0769	172.9443	299.5482
7.25	0.604167	62.98735	84.84847	131.1644	182.823	316.6588	65.04718	87.62321	135.4537	188.8018	327.0143
7.5	0.625	68.55853	92.35325	142.7657	198.9936	344.667	70.80055	95.3734	147.4345	205.5011	355.9384
7.75	0.645833	74.41536	100.2428	154.962	215.9933	374.1113	76.84891	103.521	160.0296	223.0567	386.3456
8	0.666667	80.56257	108.5235	167.7629	233.8357	405.0154	83.19715	112.0725	173.2491	241.4827	418.2603
8.25	0.6875	87.0048	117.2017	181.1781	252.5345	437.4027	89.85005	121.0344	187.103	260.793	451.7067
8.5	0.708333	93.74663	126.2834	195.2172	272.1029	471.2961	96.81235	130.4132	201.6013	281.0013	486.7086
8.75	0.729167	100.7926	135.7748	209.8896	292.554	506.7184	104.0887	140.2149	216.7535	302.1212	523.2892
9	0.75	108.147	145.6818	225.2045	313.9006	543.6919	111.6837	150.4459	232.5692	324.1659	561.4718
9.25	0.770833	115.8144	156.0103	241.1711	336.1555	582.2385	119.6018	161.1122	249.0579	347.1486	601.279
9.5	0.791667	123.7991	166.7662	257.7982	359.3312	622.3799	127.8476	172.2198	266.2288	371.0821	642.7331
9.75	0.8125	132.1052	177.9551	275.0948	383.44	664.1376	136.4253	183.7747	284.091	395.9794	685.8564
10	0.833333	140.737	189.5828	293.0697	408.4942	707.5328	145.3394	195.7826	302.6537	421.8529	730.6707
10.25	0.854167	149.6987	201.6549	311.7314	434.5058	752.5861	154.5942	208.2494	321.9257	448.7151	777.1974
10.5	0.875	158.9943	214.1767	331.0885	461.4867	799.3184	164.1938	221.1808	341.9159	476.5783	825.4579
10.75	0.895833	168.6279	227.1539	351.1495	489.4486	847.7498	174.1424	234.5823	362.6329	505.4547	875.4732
11	0.916667	178.6035	240.5917	371.9226	518.4032	897.9006	184.4443	248.4596	384.0853	535.3561	927.264
11.25	0.9375	188.9251	254.4956	393.4161	548.3619	949.7906	195.1034	262.8182	406.2817	566.2945	980.8509
11.5	0.958333	199.5965	268.8708	415.6382	579.336	1003.439	206.1238	277.6635	429.2305	598.2816	1036.254
11.75	0.979167	210.6216	283.7224	438.5969	611.3369	1058.867	217.5094	293.0008	452.94	631.329	1093.494
12	1	222.0043	299.0557	462.3001	644.3755	1116.091	229.2644	308.8355	477.4183	665.4481	1152.59
12.25	1.020833	233.7484	314.8758	486.7558	678.463	1175.132	241.3924	325.1729	502.6738	700.6502	1213.562
12.5	1.041667	245.8575	331.1876	511.9716	713.6101	1236.009	253.8975	342.0182	528.7143	736.9467	1276.429
12.75	1.0625	258.3353	347.9962	537.9555	749.8275	1298.739	266.7835	359.3764	555.5478	774.3486	1341.211
13	1.083333	271.1857	365.3065	564.7149	787.1261	1363.342	280.054	377.2528	583.1823	812.8669	1407.927
13.25	1.104167	284.4121	383.1234	592.2575	825.5162	1429.836	293.713	395.6524	611.6256	852.5125	1476.595