



**Environmental  
Protection Agency**

**John R. Kasich, Governor**  
**Mary Taylor, Lt. Governor**  
**Scott J. Nally, Director**

March 15, 2012

RE: LAKE COUNTY  
MADISON TOWNSHIP  
INTERNATIONAL PAPER  
(FORMERLY TIN INC.-TEMPLE INLAND)  
3200 COUNTY LINE ROAD  
NPDES PERMIT NO. 3IA00012

Douglas Richard, Production Manager  
International Paper  
3200 County Line Road  
Madison, OH 44057

**NOTICE OF VIOLATION**

Dear Mr. Richard:

On March 7, 2012, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves the above referenced facility. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits. You and Mr. Andrew Davis, Maintenance Technician, accompanied this writer during the inspection.

**Plant Observations**

At the time of inspection, the plant effluent showed no evidence of foam, debris, oil or grease. The plant discharges directly to an onsite pond located west of the plant.

The following observations were also noted:

1. The flow equalization tank was in operation.
2. The aeration tank blowers were in operation. The aeration tank mixed liquor was brown in color, typical for extended aeration plants.
3. The settling tank content was turbid.
4. The east filter bed was ponded with sludge. The west filter bed was not in use. Use of the filter beds should be switched. When the east bed drains, the ponded sludge must be removed and disposed at a public landfill. The sludge and top layer of sludge laden sand must be removed from the east bed and replaced with clean sand. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on the beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective sized of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter bed.
5. The facility is equipped with chlorination and dechlorination facilities. When disinfection season commences May 1<sup>st</sup> please ensure that chlorine and sulfite tables are placed in the chlorinator and dechlorinator, respectively. Disinfection of the effluent must continue through October 31<sup>st</sup>.
6. The tank grating covers were not initially locked. A follow-up inspection on March 14, 2012 revealed that locks have been placed on the tank covers.

7. In accordance with Ohio Administrative Code 3745-7-09, the operation and maintenance logbook is located in the mail box adjacent to the plant and appeared satisfactory.
8. Mr. Dustin Lewis is the operator-of-record at the plant and visits the plant three times per week.

**NPDES Permit Compliance Review**

A review of the discharge monitoring reports (DMRs), covering the period January 2010 through January 2012 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	18.62	3/1/2011
601	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	18.62	3/15/2011
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.04	.27909	3/1/2011
601	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.06	.27909	3/15/2011
601	00530	Total Suspended Solids	30D Qty	0.16	.34474	3/1/2010
601	00530	Total Suspended Solids	7D Qty	0.24	.34474	3/8/2010
601	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.08	3/1/2010
601	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.04	.09653	3/1/2010
601	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.06	.09653	3/8/2010
601	00400	pH	1D Conc	6.5	6.26	6/10/2011
601	00530	Total Suspended Solids	30D Conc	12	23.	12/1/2011
601	00530	Total Suspended Solids	7D Conc	18	23.	12/8/2011
601	00530	Total Suspended Solids	30D Qty	0.16	.21938	12/1/2011

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code, Chapter 6111.

The DMRs reveal that sludge wasting was last reported from this facility in December 2010. In order for extended aeration plants to operate properly, sludge must be wasted from time to time in order to keep the solids level within the plant at an acceptable level. The amount of sludge that is wasted must be noted. In the month of December, the total amount of sludge that has been wasted for the entire year must be reported at Station 588 of the DMR.

The NPDES permit for this facility expires September 30, 2012. A renewal NPDES permit application must be submitted to this office 180 days prior to the expiration date. Please submit a renewal NPDES permit application to this office by March 30, 2012. An application fee of \$200 must accompany the application. The check must be made payable to the Treasurer, State of Ohio. Also, because International Paper now owns this facility, please submit a letter acknowledging that you are the new owner and that the facility name has changed. The date of the facility purchase must also be included in the letter.

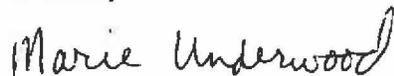
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During the inspection, Mr. Davis requested information on a list of contract operators. Ohio EPA provides on its website, a list of contract operators who voluntarily wish to be included. This web address is: <http://www.epa.ohio.gov/ddagw/opcert.aspx>. The contract operators for your consideration are listed as wastewater treatment (WW) operators who serve Lake County or the Northeast District Office (NEDO) area.

Please inform this office, in writing, within ten (10) days of receipt of this notification as to the reasons for the above referenced violations and deficiencies, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E  
Environmental Engineer  
Division of Surface Water

MU/cs

Enclosure: Extended Aeration O&M Guidance Document