



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott M. Smith, Director

April 30, 2013

Certified Mail #91 7108 2133 3932 1838 1416

Kevin McMunn, Technical Manager
Ohio Paperboard Corp
310 Water Street
Baltimore, OH 43105

NOTICE OF VIOLATION

**Re: Ohio Paperboard Corp
NPDES Permit 4IA00001/ OH0004961
Compliance Evaluation Inspection
Fairfield County**

Dear Mr. McMunn:

On April 17, 2013, a Compliance Evaluation Inspection was conducted at the Ohio Paperboard Corp. Present for the inspection was Layne Mitchell representing Ohio Paperboard and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The following items were noted or discussed during the inspection:

- ❖ The aerated treatment lagoons and the recycle water lagoon were filled to overflowing (Figure 1). Ohio Paperboard shall immediately take measures to reduce the waste levels in the lagoons providing a minimum of 1 foot of freeboard, preferably, 18 inches. This shall be accomplished by May 15, 2013.
- ❖ A letter dated April 28, 2010, from Greg Sanders of Ohio EPA, CDO, Storm Water Group highlighted several action items, one of which included diverting storm water around the wastewater treatment lagoons (see attached copy of letter). So far, the company has not made any attempt to implement the items noted in the letter. In order to preclude any possible future permit limit violations or overflow of the treatment lagoons (another violation of the NPDES permit) the company should begin to institute these recommendations immediately.

Kevin McMunn, Technical Manager
Ohio Paperboard Corp.
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- ❖ The 2 anaerobic treatment lagoons show considerable erosion of their berms (Figure 2). Ohio Paperboard shall institute measures to prevent further erosion and stabilize the berms of both lagoons. This shall be completed by October 31, 2013.

Please send confirmation of the freeboard and the repairs to the anaerobic lagoons to the e-mail address listed below. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.state.oh.us.

Sincerely,



Paul L. Vandermeer
Environmental Specialist II
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

c: Layne Mitchell, Ohio Paperboard Corp.

ec: Paul L. Vandermeer
Greg Sanders

PLV/nsm ohio paperboard cei

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODE				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IA00001	OH0004961	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
4/17/2013	8:55 am	10:30 am	Yes	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Ohio Paperboard Corp. 310 Water Street Baltimore, OH 43105	7/1/2010
	Permit Expiration Date
	7/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Layne Mitchell, Wastewater Treatment Plant Manager	(614) 783-4593
Name and Title of Responsible Official	Phone Number
Kevin McMunn, Technical Manager	(740) 862-3569

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	002 flow augmentation better
U	Operations & Maintenance	Storm water issues, berm erosion
U	Facility Site Review	Lagoons overfull
NA	Collection System	
S	Flow Measurement	
S	Receiving Waters	
S	Laboratory	

Comments:

Signatures			
			4/29/13
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

Compliance Data for Ohio Paperboard Corp between 6/1/2012 to 4/1/2013

Summary

Permit Effluent Limit Violations: 5

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	002	Flow Rate	1D Conc	0.4	.3	7/27/2012
September 2012	002	Flow Rate	1D Conc	0.4	.36789	9/3/2012
September 2012	002	Flow Rate	1D Conc	0.4	.38955	9/4/2012
October 2012	002	Flow Rate	1D Conc	0.4	.39916	10/17/2012
November 2012	002	Flow Rate	1D Conc	0.4	.39314	11/2/2012

SECTION D: PERMIT VERIFICATION

- (a) Correct name and mailing address of permittee..... Y
- (b) Correct name and location of receiving waters Y
- (c) Products and production rates conform with permit application Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process added since last inspection N
- (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:

SECTION E: COMPLIANCE

- (a) Any significant violations since the last inspection N*
- (b) Permittee is taking actions to resolve violations Y
- (c) Permittee has a compliance schedule..... N
- (d) Permittee is meeting compliance schedule NA

Comments: **Compliance threatened by overflowing lagoons. New augmentation well has alleviated flow rate violations for 002.*

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available N
If yes, what type?
- (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..... II
- (e) Operator of Record holds unexpired license of class required by Permit..
Class held: II
- (f) Copy of certificate of Operator of Record displayed on-site Y
- (g) Minimum operator staffing requirements fulfilled..... Y
- (h) Routine and preventative maintenance scheduled and 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..... NA
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection Y*

Comments: **A recent series of rain events has filled the treatment lagoons and water reuse pond to overflowing. Sand bags are currently minimizing the overflow. See body of cover letter for discussion of this situation.*

SECTION G: RECORD KEEPING

- a) Log book provided..... Y
- b) Format of log book book
- c) Log book(s) kept onsite in an area protected from weather Y
- d) Log book contains the following:
 - i) Identification of treatment works..... Y
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 Y
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) Y
 - iv) Laboratory results (unless documented on bench sheets)..... NA
 - v) Identification of person making log entries Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments:

SECTION H: COLLECTION SYSTEM

- a) Percent combined system:
- b) Any collection system overflows since last inspection.....
CSO SSO
- c) Regulatory agency notified of overflows.....
- d) CSO O&M plan provided and implemented.....
- e) CSOs monitored and reported in accordance with permit.....
- f) Portable pumps are used to relieve system.....
- g) Lift station alarms provided and maintained.....
- h) Lift stations equipped with permanent standby power or equivalent.....
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection.....
- j) Any complaints received since last inspection of basement flooding.....
- k) Are any portions of the sewer system at or near capacity.....
- l) Are operations changed during high-flow events?

Comments: *Section not applicable.*

SECTION I: SLUDGE MANAGEMENT

- a) Sludge adequately disposed.....
Method:
- b) If sludge is incinerated, where is it disposed of.....
- c) Is sludge disposal contracted?.....
Name:
- d) Has amount of sludge generated changed significantly.....

- e) Adequate sludge storage provided at plant.....
- f) Records kept in accordance with State and Federal law.....
- g) Any complaints received last year regarding sludge.....
- h) Is sludge adequately processed (digestion, pathogen control).....

Comments: *Section not applicable.*

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained..... Y
 Type of device: *Ultrasonic* Device location: *Effluent flume*
- b) Calibration frequency adequate..... Y
 Date of last calibration: *8/8/12*
- c) Secondary instruments operated and maintained..... Y
- d) Flow measurements equipment adequate to handle full range of flows.... Y
- e) Actual flow discharged is measured..... Y
- f) Flow measuring equipment inspection frequency..... daily
- g) Sampling location(s) are as specified by permit..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) 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

Comments:

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3)..... Y
- b) If alternate procedures are used, are they properly approved?..... NA
- c) Analysis performed more frequently..... Y
 If yes, are results recorded in permittee's report?..... Y
- d) Commercial laboratory used:
 Name: *MAS/*
 Parameters analyzed: *metals, O&G, cyanide, organics*
- e) Quality assurance manual provided and maintained..... Y
- f) Calibration and maintenance of instruments is satisfactory?..... Y

Comments: *Thermometers OK. Testing ovens and incubators OK. Meters calibrated as needed with usage. Sample storage OK.*

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	No	No	No	No	No	Brown	Wastewater
002	Yes	No	No	No	No	No	Clear	Augmentation

Comments:

SECTION M: MULTIMEDIA OBSERVATION

- 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: **The paper mill has typical odors associated with the industry.*

Figure 1. South treatment lagoon and the water recycle lagoon full to overflowing. Note sandbags.

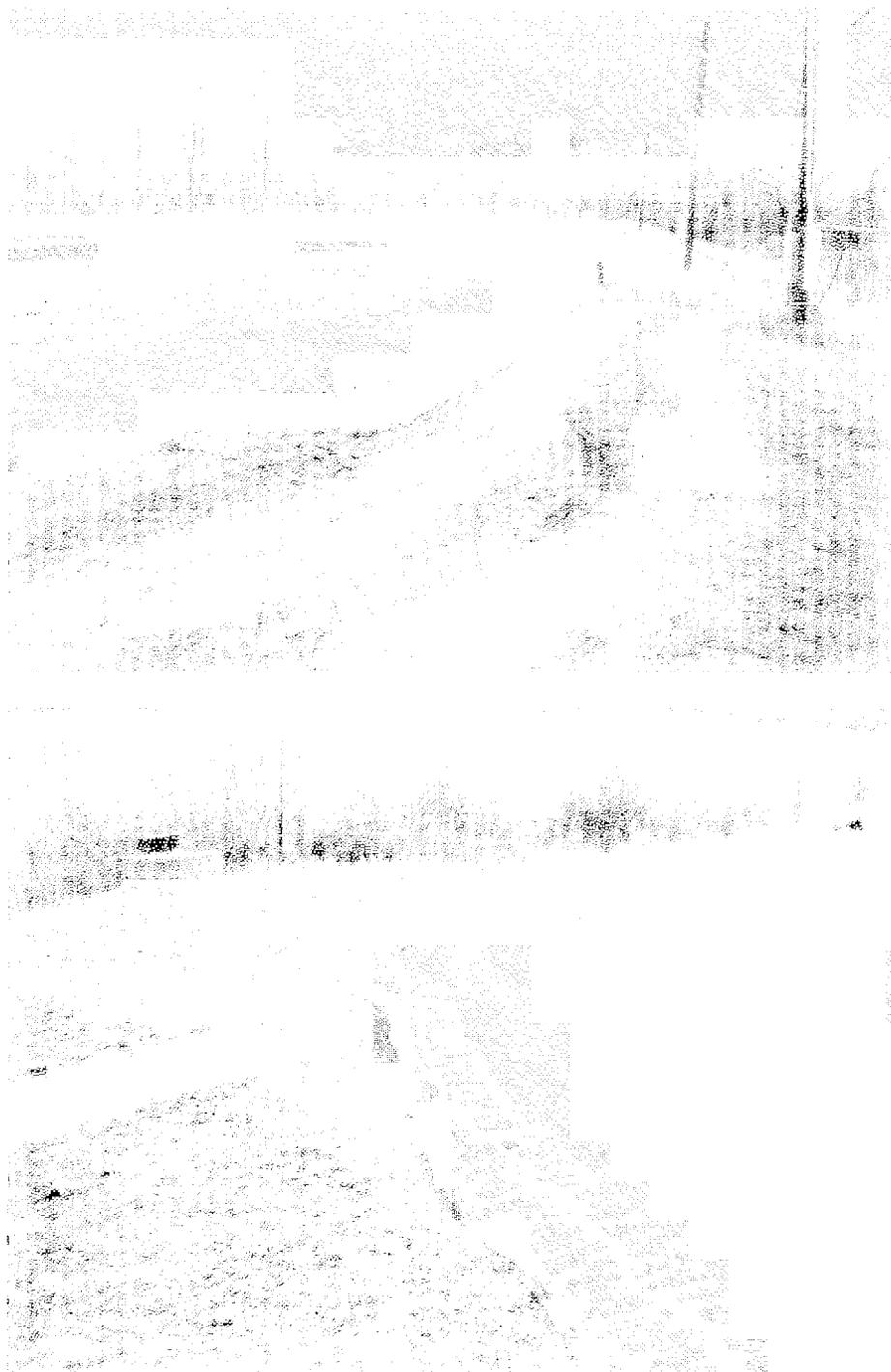
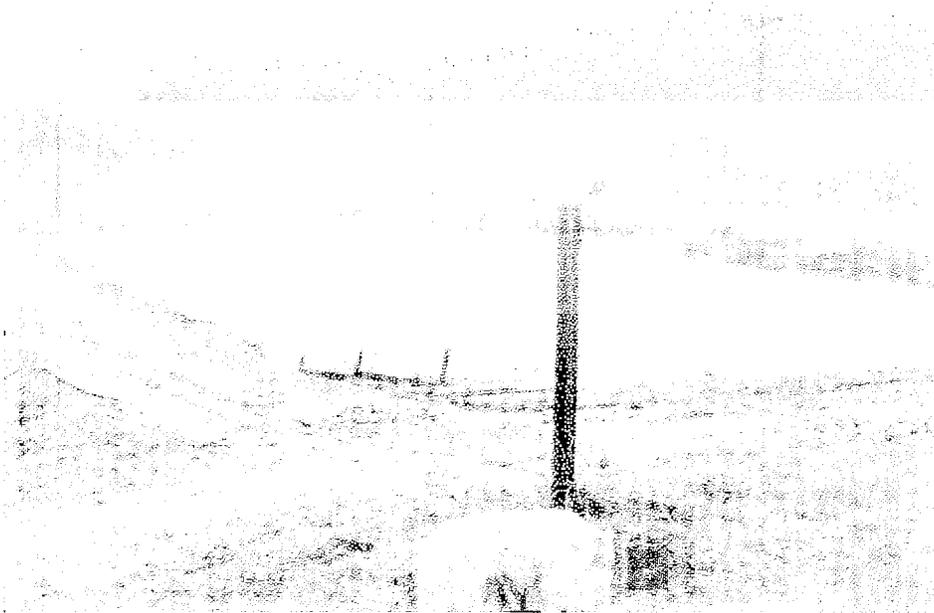


Figure 2. Anaerobic treatment lagoons. Note the eroded berms and sediment in the 2nd photograph.





State of Ohio Environmental Protection Agency

PHYSICAL ADDRESS:

Central District Office

MAILING ADDRESS:

Lamarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

April 28, 2010

Jeffrey Peters
The Newark Group Paperboard Mills
Ohio Paperboard Corporation
310 Water Street
Baltimore, OH 43105-1272

Re: **Ohio Paperboard / Fairfield County
Industrial Storm Water Permit 4GR00120-DG**

Dear Mr. Peters:

This letter is written in regard to the storm water inspection that I conducted at Ohio Paperboard Corporation located at 310 Water Street, in Baltimore, Ohio. The inspection was conducted on April 21, 2010, to determine compliance with your industrial storm water permit. Your company recycles cardboard into packaging material. Your standard industrial classification code is 2631. I did not note any contaminated discharge from your facility to a storm water drain or waters of the state and you appear to be in compliance with your permit.

The following items were noted during the inspection:

1. Your company had a storm water pollution prevention plan (SWP3) and a spill prevention plan at the facility. The plans were reviewed annually or after a change in staff.
2. Unloading is done in a contained area. Most of the unloading areas have secondary containment and under roof.
3. There were several drums stored outside. The drums need to be labeled. The drums either need to be stored inside the building or they need to be stored with lids and in secondary containment.
4. A map of your storm water discharge points were provided to me. It is recommended that the outfall that serves the main part of the outside production area have a gate valve. The gate valve could be closed in the event of a spill.

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

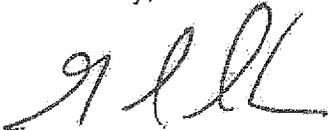


Jeffrey Peters
The Newark Group Paperboard Mills
Ohio Paperboard Corporation
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12. It was discussed that the storm water lines that serve the southeastern corner of the property be re-routed to discharge to the West Branch of Paw Paw Creek instead of directly to Paw Paw Creek.
13. We also discussed the possibility of capturing the methane from the anaerobic lagoons. We stated that we would provide you with contacts and phone numbers of facilities that capture and use their methane gas.

If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3851.

Sincerely,



Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosures

c: Jeff Bohne, DSW/CDO

GS/nsm Ohio Paperboard, April 21, 2010