



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

July 16, 2013

RE: LAKE COUNTY  
MADISON TOWNSHIP  
INTERNATIONAL PAPER  
3200 COUNTY LINE ROAD  
NPDES PERMIT NO. 3IA00012

**NOTICE OF VIOLATION**

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

Dear Mr. Richard:

On July 11, 2013, this writer conducted a compliance evaluation inspection of the wastewater treatment plant (WWTP) that serves the International Paper. 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.

**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 noted:

- The flow equalization tank was in operation.
- The extended aeration plant was in operation. The aeration tank mixed liquor was brown in color, typical for extended aeration plants.
- The east filter bed had sludge on the surface. The west filter bed was not in use. The sludge and top layer of sludge laden sand should be removed from the east bed and replaced with clean sand. Assurances must be made that 18 inches of Ohio EPA approved filter sand is used 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.
- The chlorination and de-chlorination facilities were operating satisfactorily; however, care should be taken to prevent grass clippings from entering the chlorine contact chamber.
- The operation and maintenance log book is located in the mail box adjacent to the plant and appeared satisfactory.
- Mr. Steve Howe is the operator-of-record at the plant.

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NPDES Permit Compliance Review

A review of the discharge monitoring reports, covering the period February 2012 through June 2013 revealed the following violations:

| Station | Reporting Code | Parameter              | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|------------------------|------------|-------|----------------|----------------|
| 601     | 00610          | Nitrogen, Ammonia-NH3  | 30D Qty    | 0.04  | .04464         | 3/1/2012       |
| 601     | 80082          | CBOD 5 day             | 30D Qty    | 0.13  | .15942         | 3/1/2012       |
| 601     | 00530          | Total Suspended Solids | 30D Conc   | 12    | 16.            | 8/1/2012       |
| 601     | 00610          | Nitrogen, Ammonia-NH3  | 30D Conc   | 3.0   | 3.75           | 3/1/2013       |

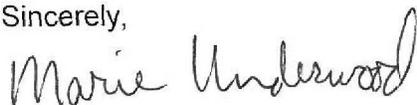
On numerous occasions between February 2012 and May 2013, the flow rate for Station 601 was not reported. In the comment section of the DMRs, it states that facility personnel did not record flow. The NPDES permit requires the reporting of flow each day. The only exception to this is when the facility is not regularly staffed (eg. on weekends or holidays).

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.

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

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