



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

September 13, 2013

Mr. James Andruszko
International Fiber Corporation
1228 Muzzy Road
Urbana, Ohio 43078

RE: International Fiber Corporation (NPDES # 1H00020*CD) Reconnaissance Inspection.

Dear Mr. Andruszko:

On August 29, 2013, a representative of the Ohio Environmental Protection Agency (Ohio EPA) Southwest District Office conducted a Reconnaissance Inspection at International Fiber Corporation located at 1228 Muzzy Road, Urbana Ohio. The inspection was conducted as part of the facilities National Pollutant Discharge Elimination System (NPDES) permit renewal process.

The findings from the inspection are included in the attached report. There are three items that require a response. Please respond to these items by no later than November 1, 2013.

If you have any questions regarding the report, you may contact Joe Reynolds at (937) 285-6097.

Sincerely,

A handwritten signature in black ink that reads "Martyn G. Burt".

Martyn G. Burt
Compliance & Enforcement Supervisor
Division of Surface Water

Enclosure

cc: Fred Organ, International Fiber Corporation

MGB\bp



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11H00020*CD	OH0096237	8/29/2013	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
International Fiber Corporation 1228 Muzzy Road Urbana, Ohio 43078	12:00 PM	10/1/2008
	Exit Time	Permit Expiration Date
	1:40 PM	9/30/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
James Andruszko, Interim Plant Manager Fred Organ, Corporate Maintenance Manager	(937) 652 - 8100 (716) 909 - 1064	
Name, Address and Title of Responsible Official	Phone Number	
James Andruszko, Interim Plant Manager 1288 Muzzy Road Urbana, Ohio 43078	(937) 652 - 8100	

Section C: Areas Evaluated During Inspection					
(S - Satisfactory, M - Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
M	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached report.

Inspector	Reviewer
 Date: 9/13/2013	 Date: 9/13/13
Joe Reynolds Environmental Spec. II Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

International Fiber Corporation
1228 Muzzy Road
Inspection Findings, NPDES # 11H00020*CD

On August 29, 2013, a Reconnaissance Inspection was conducted at the International Fiber Corporation facility, 1228 Muzzy Road, Urbana Ohio. The inspection was conducted as part of the National Pollutant Discharge Elimination System (NPDES) permit renewal process for the facility. An NPDES renewal application was submitted on April 24, 2013.

As part of the NPDES renewal, a review of the winter temperature limit is being conducted. A request for updated modeling has been made. The primary Standard Industrial Code (SIC) for the facility is 2099, "Food Preparation NEC". Parts IV, V, and VI storm water language associated with this SIC will be included in the permit.

The site hydrogeology (sand and gravel) limits the amount of storm water that leaves the site as surface water drainage. A large volume infiltrates into the ground. The main surface drainage is through outfall 001 to a tributary of Dugan Run.

The facility has a Storm Water Pollution Prevention Plan (SWP3). The plan is in need of updates to address recent changes in personnel and activities at the facility. The update should address the site drainage map, inspections of the bag houses, floor drains (sealed to prevent drainage to the storm system), dumpster areas, drum storage areas, scrap materials storage area, loading dock areas, and routine sweeping / clean-up of all materials handling areas.

There are four buildings / plants at the site. The roof drains from buildings / plants A, B, and C go to outfall 001. Building / Plant D roof drains go to an on-site infiltration pond. The pond was dry at the time of the inspection. There are air pollution control sources (bag houses) in or on all four buildings.

With the permit renewal, routine quarterly and comprehensive annual inspections will need to be conducted at the facility. Records of these inspections need to be maintained on site.

Between January 1, 2010, and July 30, 2013, International Fiber Corporation reported three final effluent temperature violations.

International Fiber Corporation
1228 Muzzy Road
Inspection Findings
11H00020*CD

Items Requiring a Response

1. Please provide copies of updated / revised pages to the SWP3, including team members and responsibilities, site map with drainage contours, any potential exposure areas (drum storage, dumpsters, bag houses, materials handling, etc.) for contaminant to enter storm water, and updated quarterly and annual inspection forms. These forms should specify areas to be inspected.
2. The final effluent thermometer should be calibrated on an annual basis. A Standard Operating Procedure (SOP) for thermometer calibration and Maintenance will need to be developed.
3. In order to minimize storm water exposures to materials being stored outside (dumpsters, drum storage areas, old equipment), consideration should be given to storage of these materials in covered areas.