



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

January 27, 2015

Mr. Kevin Rasler  
President and General Manager  
Inland Empire Paper Company  
3320 N. Argonne Road  
Spokane, WA 99212

RE: Inland Empire Paper Co. NPDES Permit No. WA-0000825  
Inspection of Wastewater Treatment Facilities,

Dear Mr. Rasler:

I have enclosed the NPDES inspection report from my site visit on June 26, 2014. I apologize for the delay in finalizing this report. Based on the inspection, I have rated your facility in compliance with the terms and conditions of your NPDES permit.

There were only a couple of items noted on the inspection report.

1. Your permit contains a typographical error in the date for the permit renewal application. The renewal application should be due by April 30, 2016 (180 days prior to expiration), not on April 30, 2015, the date listed in the current permit. We plan to send corrected pages in the very near future.
2. For permit monitoring and reporting, you should ensure that for continuous monitoring charts, the date, time, and individual is recorded for anyone who collects, reads and reports chart data. In addition, we are aware that you may have tested the effluent for ammonia more often than once per month, the frequency specified by the permit. If not reported on the DMR form, we are requesting that you send us the results (with appropriate signature certification) for these months.

I wish to thank Doug Krapas for his assistance during the inspection. Please review the report and if you have any questions, please feel free to call me at (509) 329-3500.

Sincerely,

Pat Hallinan  
Water Quality Section

PH:jab

Enclosures

cc: Doug Krapas, Inland Empire Paper Company



State of Washington Department of Ecology  
Eastern Regional Office  
**WATER COMPLIANCE INSPECTION REPORT**

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code 1 <b>N</b> 2 <b>5</b>	NPDES # 3 <b>WA-00082-5</b> 11	yr/mo/day 12 <b>14/06/26</b> 17	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>2</b>
Remarks <b>Inland Empire Paper Company, Class I Inspection</b>					
Inspection work days 67 <b>2.0</b> 69	Facility Self-Monitoring Evaluation Rating 70 <b>5</b>	BI 71 <b>N</b>	QA 72 <b>N</b>	Reserved 73 _____ 74 _____ 75 _____ 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Inland Empire Paper Company 3320 N. Argonne Road Spokane, WA 99212-2099</b>	Entry Time/Date /	Permit Effective Date 11/01/11
	Exit Time / Date /	Permit Expiration Date 10/31/16
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Doug Krapas, Environmental Manager  (509) 924-1911; fax (509) 927-8461</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number. <b>Kevin Rasler President and General Manager -same as above- Phone Number (509) 924-1911 Fax (509) 927-8461    Contacted ?   <input type="checkbox"/> Yes   <input checked="" type="checkbox"/> No</b>		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other

Section D: Summary of Findings/Comments

**Permit:** Ecology re-issued Inland Empire Paper Company's NPDES permit in November, 2011 with an expiration date of October 31, 2016. The Permit contained an error for the due date of the permit renewal application. The permit listed a date of April 30, 2015, which should be April 30, 2016 (180 days prior to the permit expiration date). Ecology plans to correct this error as a minor permit modification.

The Permittee operates a groundwood pulp mill and newsprint paper mill. The facility produces pulp from fiber recycling (newsprint, office paper, etc.) and thermo-mechanical pulping (TMP) of wood chips. Current production runs about 550 tons per day of newsprint with recycle fiber at about 26 tons per day.

**Records/Reports:** The Permittee has submitted all reports required by the permit. Recent documents include annual status reports related to the compliance schedule and limits for total phosphorus, CBOD, and ammonia, which includes a BMP Plan, compliance schedule update, and delta management plan. The Permittee also submitted an Ecology accepted scope of work for PCB source identification study. The study includes a sampling plan for internal wastestreams, noncontact cooling water and final effluent in order to identify/quantify PCBs within the facility. The sampling is ongoing, with results expected from the contract laboratory in the 1<sup>st</sup> quarter of 2015.

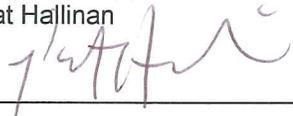
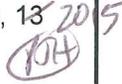
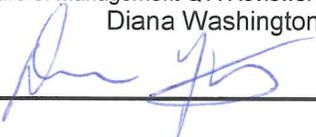
The attached table lists a discharge monitoring report summary from January 2012 through September 2014. The facility exceeded daily maximum permit limits for BOD in May 2012 and again in April 2013. The May 2012 violation resulted from inadequate nutrient addition to the wastewater treatment system due to a plugged line. The April 2013 exceedence was caused by an excess release of defoamer into the wastewater system. For both incidents, the company promptly implemented measures to prevent any reoccurrences. In August 2014, the company exceeded interim limits for the daily maximum limit for phosphorus in August 2014. This was caused by a breakage of a sight tube that leaked into the secondary containment system. After a rainfall event, mill personnel transferred the water in the containment system into the wastewater treatment system.

For recordkeeping on chart recordings (e.g. pH), recommended the facility record the person who collects these recordings as well as reads and reports chart data (minimum and maximum).

**Facility Site Review:** Wastewater treatment consists of primary clarification, biological treatment in both a moving bed biofilm reactors (MBBR) and a carousel system, and secondary clarification prior to discharge to the Spokane River. The facility uses one 75' diameter clarifier for flow/organic load equalization. During production of brighter papers, the Permittee diverts the resulting higher strength flows into this clarifier, for later treatment in the wastewater system.

The facility has constructed a 0.1 mgd algae based pilot treatment system (trade name Clearas Water Recovery) for effluent phosphorus removal. During the inspection, facility was operating the system and evaluating two membrane filter technologies for algae/water separation (see attached photographs). The Permittee is currently conducting additional trials on two additional membrane filter units.

Self-Monitoring Program: The permit requires testing of the final effluent for ammonia once per month. The Permittee had sampled ammonia more frequently for several months and these results may have not reported on the DMR form.

Name(s) and Signatures of Inspector(s) Pat Hallinan 	Agency/Office/Telephone WA Dept. of Ecology/Eastern Regional Office 4601 N. Monroe Street, Spokane, WA 99205-1295 (509) 329-3500	Date Jan. 9, 13 <sup>th</sup> 20 <sup>15</sup> 
Signature of Management Q A Reviewer Diana Washington 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/Eastern Regional Office rev's phone (509) 329-3504 fax # (509) 329-3570	Date 1/28/15

**ANNOUNCED** Inspection

**INSTRUCTIONS****Section A: National Data System Coding (i.e., PCS)**

**Column 1: Transaction Code.** Use N, C, or D for New Change or Delete. All inspections will be new unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number. *(Use the Remarks columns to record State permit number, if necessary.)*

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

**Column 18: Inspection Type.** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

**Column 19: Inspector Code.** Use one of the codes listed below to describe the *lead agency* in the inspection.

C - Contractor or Other Inspectors ( <i>Specify in Remarks Columns</i> )	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as Federal by the EPA Regional Office

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

**Section B: Facility Data**

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

**Section C: Areas Evaluated During Inspection**

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

**Section D: Summary of Findings/Comments**

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

Date	Flow (mgd)		pH (s.u.)		Temp (F)		BOD (mg/L)		BOD (lbs/day)		CBOD (mg/L)		CBOD (lbs/day)		TSS (mg/L)		TSS (lbs/day)	
	Avg	Max	Min	Max	Avg	Max	Avg	Max	Avg	Max	Avg	Max	Avg	Max	Avg	Max	Avg	Max
Jan-12	6.73	7.18	7.9	8.1	75	78	11.1	24.4	627	1452	8.2	465	8	42	462	2377		
Feb-12	6.46	7.06	7.9	8.2	70	76	10.1	42	550	2343	6.1	308	10	32	532	1785		
Mar-12	6.39	6.75	8.1	8.3	71	76	6	13	332	701	5	260	9	38	499	1971		
Apr-12	6.57	7.23	8	8.3	76	79	12	26	654	1472	16.1	912	12	38	668	2191		
May-12	6.60	7.00	7.6	8.2	73	77	12	29	690	<b>1580</b>	8.5	464	11	38	632	2116		
Jun-12	6.43	6.73	7.9	8.2	75	78	10.6	27.4	570	1465	9.1	497	14	27	756	1454		
Jul-12	6.52	6.90	7.9	8.2	77	80	9	18	491	976	9	459	10	43	544	2454		
Avg-12	6.50	7.00	7.7	8.2	79	84	7.7	23.6	421	1352	11	610	10	31	556	1776		
Sep-12	6.59	7.02	8	8.3	80	83	7.3	18.2	400	977	7.7	451	10	25	569	1356		
Oct-12	6.60	7.18	8.1	8.2	78	81	7.1	21.8	388	1132	19.2	1053	7	23	387	1261		
Nov-12	6.68	7.09	8.1	8.2	78	80	11.1	28.3	613	1521	6.1	343	8	16	452	896		
Dec-12	6.67	6.94	7.9	8.2	78	78	9	21.5	501	1209	10.4	541	8	33	446	1856		
Jan-13	6.61	7.37	8	8.2	74	76	7.1	16.2	390	863	10.6	554.3	6.5	25	363	1392		
Feb-13	6.58	6.86	8.1	8.2	74	78	11.3	22.4	620	1194	17.8	984	8	32	420	1831		
Mar-13	6.23	6.80	8	8.2	75	78	11.8	23.6	615	1213	18	926	8	24	401	1249		
Apr-13	5.98	6.42	7.9	8.1	75	77	17	49	867	<b>2511</b>	14	694	8	28	415	1447		
May-13	6.08	6.52	7.5	8.2	76	78	11.4	21.4	575	1079	12.6	639	9	28	436	1415		
Jun-13	5.81	6.46	7.4	8.4	77	81	9.1	14.1	439	666	6.1	316	7	26	358	1199		
Jul-13	6.08	6.65	7.2	8.3	79	83	11.21	21.8	567	1052	11	551	6	14	315	628		
Aug-13	6.59	7.27	7.3	7.8	81	85	8.9	23.4	487	1312	16.8	942	6	17	331	922		
Sep-13	6.80	7.14	7.3	7.8	82	83	7.7	11.9	440	697	5.5	315	7	14	411	764		
Oct-13	6.87	7.54	7.6	7.7	79	82	5.5	8.6	317	493	5.2	295	5	11	300	629		
Nov-13	6.85	7.59	7.4	7.9	77	82	5.3	13	304	802	7.4	420	6	14	329	886		
Dec-13	6.80	7.18	7.6	7.7	76	78	7.5	13.1	428	778	7	387	7	22	382	1175		
Jan-14	6.89	7.32	7.2	7.7	78	80	11.9	19.8	680	1118	9.9	580	8	18	431	1023		
Feb-14	6.39	7.41	7.2	7.5	80	80	24.8	47.3	1318	2520	17.4	974	21	104	1084	5384		
Mar-14	5.90	6.50	7.2	8	77	80	9.47	15.1	480	746	6.5	307	7	17	359	793		
Apr-14	6.13	6.75	7.5	7.9	76	79	11.3	18.2	575	917	12.8	642	9	22	479	1238		
May-14	6.55	7.01	7.5	7.8	77	80	7.8	13.5	423	711	8.7	472	7	22	375	1275		
Jun-14	6.69	7.21	7.1	8.1	78	84	9.2	13.4	511	726	9.5	514	8	17	425	950		
Jul-14	6.94	7.54	6.8	7.4	79	83	7.9	14.7	455	826	7	411	6	17	344	990		
Aug-14	7.00	7.50	6.9	7.5	81	83	7.2	12.6	418	646	9.1	525	7	16	392	966		
Sep-14	6.80	7.30	7.1	7.7	80	82	5.2	8.9	297	531	5.7	323	5	14	300	785		

Nov-Feb	5	9	-	-	-	-	1101	1555	-	-	-	-	-	-	-	-	6392	8450
Mar-Oct	-	-	5	9	-	-	-	-	3530	6655	-	-	-	-	-	-	4525	12070

Indicates permit limit exceedence

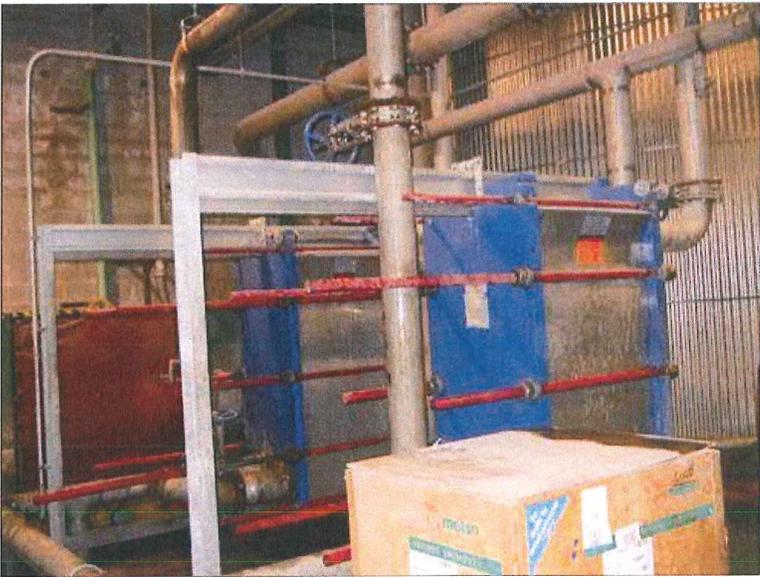
Date	NH3-N (mg/L)	NH3-N (lbs/day)	Total P (mg/L) Avg	Total P (mg/L) Max	Total P (lbs/day) Avg	Total P (lbs/day) Max	Total Reactive P (mg/L) Avg	Total Reactive P (mg/L) Max	Total Reactive P (lbs/day) Avg	Total Reactive P (lbs/day) Max	Hardness (mg/L)	Cd (ug/L)	Pb (ug/L)	Zn (ug/L)
Jan-12	0.05	3	0.18	0.36	9.77	19.66					160	<1	<1	92.7
Feb-12	0.06	3.09	0.2	0.48	10.4	26.6	0.05	0.1	2.6	5.4	147	<1	<1	61.4
Mar-12	0.07	3.74	0.18	0.45	9.62	25.02	0.09	0.35	5.02	19.46	152	<1	<1	9.67
Apr-12	0.07	4	0.18	0.38	9.6	20.4	0.04	0.1	2.4	5.5	151	<1	1.1	84.2
May-12	0.06	3	0.16	0.42	8.58	22.81	0.08	0.26	4.15	14.12	152	<1	<1	84.3
Jun-12	0.08	4.2	0.22	0.62	12.1	33.88	0.11	0.43	6.11	23.5	153	<1	1.57	97.2
Jul-12	0.14	7.22	0.23	0.46	12.4	25.63	0.13	0.32	7.24	17.83	140	<1	1.3	88
Aug-12	0.12	6.41	0.14	0.24	7.55	12.95	0.08	0.16	4.54	8.88	138	<1	1.44	<1
Sep-12	0.14	8.2	0.17	0.31	9.6	17.5	0.12	0.28	7.9	15.8	152	<1	2.2	104
Oct-12	0.08	4.69	0.1	0.2	5.29	11.47	0.04	0.07	2.27	4.1	148	<1	1.44	61.6
Nov-12	0.06	3.22	0.14	0.44	7.93	26.02	0.02	0.05	1.1	2.96	144.2	<1	<1	7.9
Dec-12	0.06	3.39	0.16	0.62	8.76	34.34	0.11	0.56	6.33	31.02	141.3	<1	<1	67
Jan-13	0.09	5	0.18	0.48	9.95	27.32			0.1	0.36	151.3	<1	1.4	8.22
Feb-13	0.08	4.39	0.15	0.24	7.91	12.74	0.05	0.08	2.81	4.42	148	<1	1.07	81.5
Mar-13	0.1	5.38	0.2	0.54	10.05	25.11	0.11	0.31	5.28	14.42	163	<2	3.65	112
Apr-13	0.08	4.03	0.11	0.25	5.58	11.57	0.03	0.07	1.27	3.24	167.6	<2	<2	164
May-13	0.1	5.09	0.2	0.44	10.3	23.31	0.09	0.38	4.82	20.13	144	1.16	<1	95.1
Jun-13	0.07	3.62	0.22	0.34	10.32	14.72	0.14	0.29	6.23	10.24	149	<1	1.18	72.7
Jul-13	0.1	5.55	0.26	0.8	12.71	36.29	0.15	0.44	7.35	19.96	140	<1	1.65	104
Aug-13	0.12	7	0.24	0.42	13.28	23.1	0.12	0.29	6.77	15.87	137	<1	1.68	83.9
Sep-13	0.08	4.6	0.11	0.29	6.56	17.27	0.05	0.22	3	13.1	144	<1	1.39	99.5
Oct-13	0.08	4.51	0.22	0.4	12.6	24.45	0.13	0.29	7.31	17.05	150	<1	1.29	72.6
Nov-13	0.18	10.2	0.90	3.30	5.19	18.32	40	230	2.4	12.77	164	1	1.11	89.9
Dec-13	0.07	3.9	0.09	0.12	5	6.84	0.01	0.05	0.41	0.56	156	<1	1.97	90.6
Jan-14	0.09	5.12			4.58	5.71			0.08	0.56	161	<1	1.25	113
Feb-14	0.15	8.4			12.63	29.51			0.71	1.38	171	1.04	1.39	97.3
Mar-14	0.08	4.08	0.2	0.46	10.04	23.96	0.09	0.31	4.83	16.15	179.6	<1	<1	81
Apr-14	0.12	6.36	0.12	0.18	6.07	9.85	0.02	0.06	1.06	2.99	146.5	<1	1.61	94.9
May-14	0.21	10.4	0.1	0.24	5.87	13.91	0.04	0.09	2.39	5.22	145.8	<1	1.3	107
Jun-14	0.11	6.4	0.13	0.16	6.9	8.75	0.04	0.08	2.25	4.26	129.8	<1	1.47	89
Jul-14	0.13	7.6	0.08	0.11	4.35	6.63	0.03	0.05	1.48	3.06	126.2	<1	2.94	114
Aug-14	0.17	10.46	0.21	0.91	12.49	54.92	0.17	0.89	10.05	53.72	133	1.13	10	129
Sep-14	0.09	5.2	0.13	0.27	7.32	15.9	0.06	0.21	3.43	12.37	134.2	<1	2.02	119

Nov-Feb Limits	Avg Month: 2.8	Daily Max: 4.1
-	-	-

Mar-Oct Limits	Avg Month: 2.8	Daily Max: 4.1	24.7	49.7
-	-	-	-	-

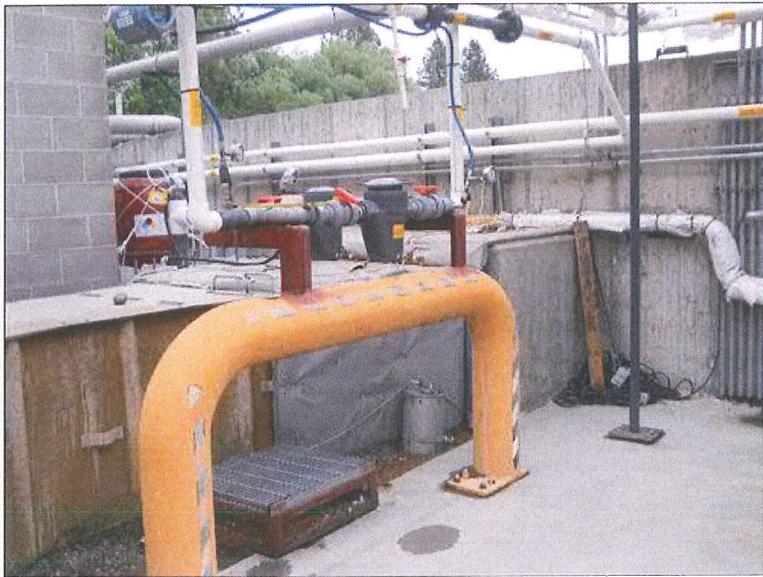
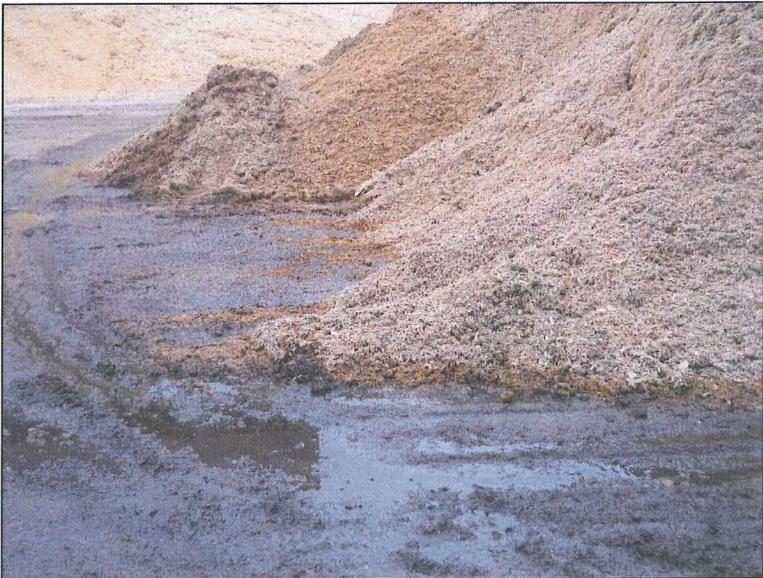
Location: Millwood  
Date Photos Taken: June 26, 2014

Permit No.: WA0000825  
Photographer: Pat Hallinan

#	Description	Photographs
1	Heat exchangers used to cool process wastewater prior to discharge into the wastewater treatment system.	
2	Sand filters at effluent flume which are part of algae based pilot treatment system (trade name Clearas Water Recovery). The facility initially used the filters in the pilot, but switched to basket strainers instead.	

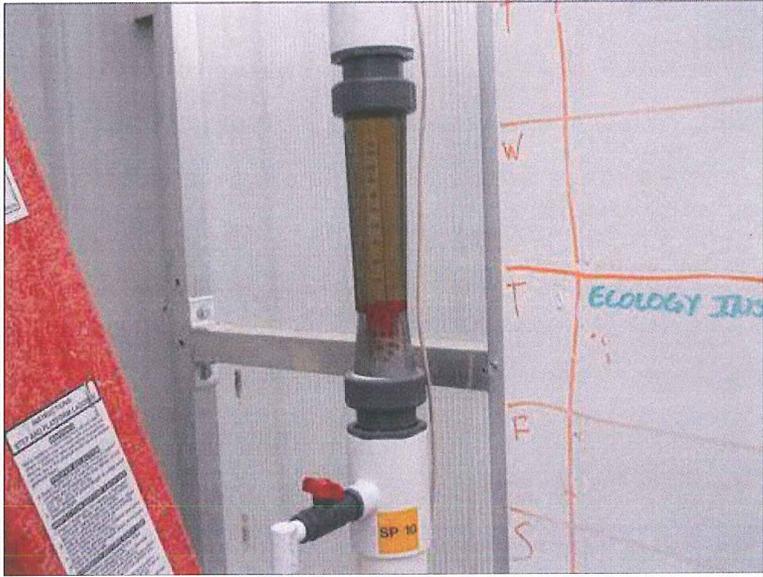
Location: Millwood  
Date Photos Taken: June 26, 2014

Permit No.: WA0000825  
Photographer: Pat Hallinan

#	Description	Photographs
3	Basket strainers that replaced sand filtration for the algae based pilot treatment system.	 A photograph showing industrial equipment in a treatment facility. In the foreground, there is a large, U-shaped orange metal structure. Behind it, a metal grate sits on a concrete base. The background is filled with a complex network of white pipes, valves, and other machinery. A grey concrete wall is visible on the left side.
4	Refiner reject fiber. The facility trucks the fiber offsite for use in compost (the fiber is too wet to burn onsite). The pile generates some water which flows into the stormwater system then into the wastewater treatment system.	 A photograph of a large, dark, and wet pile of material, likely paper mill reject fiber, situated in an outdoor area. The pile is dark brown/black and appears very moist. In the background, there are large, light-colored mounds of earth or other materials. The ground in the foreground is also wet and reflective.

Location: Millwood  
Date Photos Taken: June 26, 2014

Permit No.: WA0000825  
Photographer: Pat Hallinan

#	Description	Photographs
5	Algae based pilot treatment system, final effluent.	
6	Algae based pilot treatment system.	

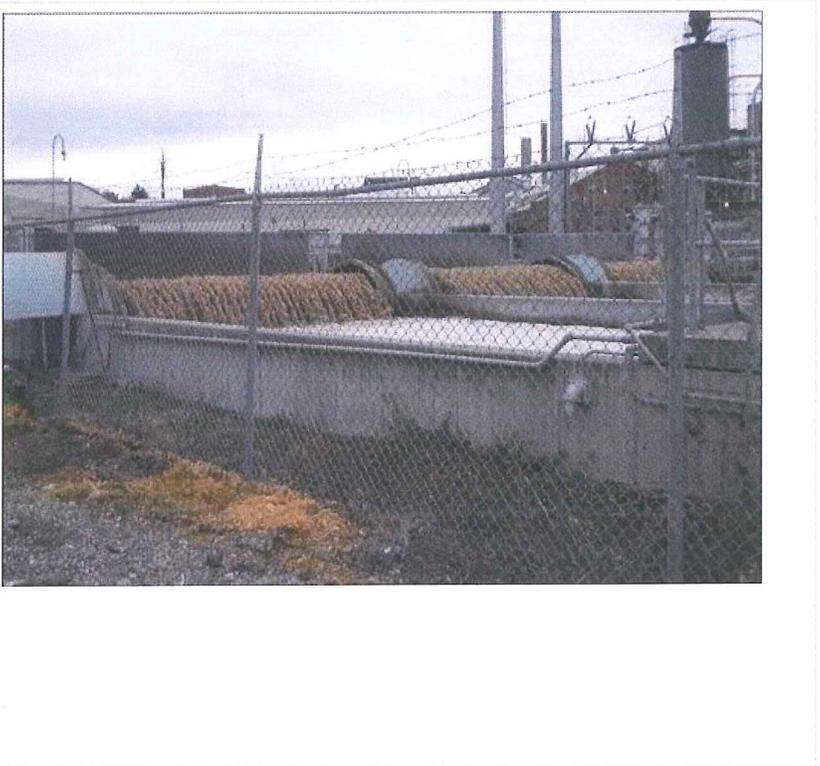
Location: Millwood  
Date Photos Taken: June 26, 2014

Permit No.: WA0000825  
Photographer: Pat Hallinan

#	Description	Photographs
7	Trial filtration unit at algae based pilot treatment system. The filter resembles a plate and frame unit with outside to inside flow across the membrane.	
8	Another trial membrane at the algae based pilot treatment system. This membrane is a bundle of fibers, with flow moving from outside to inside.	

Location: Millwood  
Date Photos Taken: June 26, 2014

Permit No.: WA0000825  
Photographer: Pat Hallinan

#	Description	Photographs
9	Close-up of membrane bundle.	
10	Orbal aeration basin. The facility also uses moving bed bioreactors to reduce BOD prior to the Orbal basin.	

Location: Millwood  
Date Photos Taken: June 26, 2014

Permit No.: WA0000825  
Photographer: Pat Hallinan

#	Description	Photographs
11	Clarifier presently used as temporary storage for higher strength wastewater flows. The permittee then meters the collected wastewater back into the wastewater treatment system.	