



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

January 23, 2013

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

RE: Inspection of Wastewater Treatment Facilities, NPDES Permit No. WA-0000825

Dear Mr. Rasler:

I have enclosed the NPDES inspection report for my site visit on September 21, 2012. 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 recently re-issued NPDES permit.

I noted a couple of items requiring your attention. For metals monitoring data, we need non-detectable values reported as < 'actual detection level' (i.e. <2) rather than using the qualifier 'ND'. Our permit monitoring database requires us to enter a numeric value for the non-detectable level.

Secondly, we are still awaiting a revised operations and maintenance manual based on comments we made on the original submittal earlier in the year. I understand you will have the changes made by the end of January. If you have any questions on the preparation of the O&M manual, please let me know

I wish to thank Doug Krapas and Chris Avert for their 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,

A handwritten signature in blue ink, appearing to read "Pat Hallinan", is written over the "Sincerely," line.

Pat Hallinan  
Water Quality Section

PH:dw

Enclosure

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-000082-5</b> 11	yr/mo/day 12 <b>12/09/21</b> 17	Inspection Type 18 <b>C</b>	Inspector 19 <b>S</b>	Fac Type 20 <b>2</b>
Remarks Inland Empire Paper Company, Class I Inspection					
Inspection work days 67 <b>1.5</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) Inland Empire Paper Company 3320 N. Argonne Road Spokane, WA 99212-2099	Entry Time/Date 9:00 AM / Sep. 21, 2012 Exit Time / Date 11:30 AM / Sep. 21, 12	Permit Effective Date 11/01/11 Permit Expiration Date 10/31/16
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Doug Krapas, Environmental Manager Chris Avert, Environmental Engineer (509) 924-1911; fax (509) 927-8461 Name, Address of Responsible Official/Title/Phone and Fax Number. Kevin Rasler President and General Manager -same as above- Phone Number (509) 924-1911 Fax (509) 927-8461	Other Facility Data	
Contacted ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

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 checked="" type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving water	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other

Section D: Summary of Findings/Comments

Permit: Ecology re-issued the Inland Empire Paper Company's NPDES permit in November, 2011 with an expiration date of October 31, 2016.

Records/Reports: The permit required a number of submittals during the first year of the permit term. These included Regional Toxics Task Force Documents; updates to the facility's Spill Plan and Operations & Maintenance Manual; Solid Waste Control Plan; Acute and Chronic Whole Effluent Toxicity (WET) characterization data and summary report; and Best Management Practices Plan, Delta Elimination Plan, and Annual Status Report associated with the compliance schedule for meeting water quality based effluent limits for total phosphorus, CBOD, and ammonia. The facility has submitted all these reports by their respective due dates.

Ecology requested revisions to the O&M Manual, and the Permittee is currently modifying the document. Ecology HQ's office is reviewing the WET toxicity characterization summary report. The characterization showed no acute toxicity and some chronic toxicity in 100% effluent. It appears that the facility will not need a WET limit, but this will be confirmed by HQ review. If no limit is needed, the facility will re-test for WET at the time of permit renewal.

The attached table lists a DMR report summary from November, 2011 through October, 2012. The facility exceeded their March-October, daily maximum permit limit for BOD in May of 2012. Upon investigation, the facility found that the ammonium polyphosphate addition line to the wastewater system had plugged, resulting in a lack of nutrients in the wastewater system. The Permittee has added a flow transmitter to the nutrient addition lines that will alert the operators in the event of plugged line. The Permittee has met all other permit limits since Ecology renewed the permit.

For metals reporting (cadmium, lead and zinc), the effluent typically contains non-detectable levels of cadmium, and lead. The Permittee has reported these non-detectable levels with a single qualifier (ND). For data entry purposes, Ecology needs these levels reported as '<actual detection level'. Ecology has requested the facility report past metal monitoring data in this format for entry into our permit monitoring database.

The facility has also been testing and reporting PCB levels in their effluent (once every two months), according to the permit monitoring frequency requirement. For the first few samples, the Permittee collected samples for PCB analysis using the regular 24-hour effluent testing set-up (plastic tubing/collection jug). Inland Empire switched sampling collection to grab/grab composite to avoid possible sampling bias from the plastic tubing and collection jug.

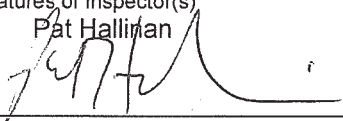

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**Facility Site Review:** The Permittee operates a groundwood pulp mill and newsprint paper mill. The facility produces pulp from recycling of old newspapers and thermo-mechanical pulping (TMP) of wood chips. Current production runs from about 500 to 550 tons per day of newsprint. The recycling of old newsprint remains low due to its high cost due to overseas demand.

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.

During the inspection, the facility was constructing a 0.1 mgd algae based pilot treatment system (trade name Algevolve) for effluent phosphorus removal. The Permittee will use final effluent, pretreated by sand filtration and carbon dioxide addition. As recommended during the inspection, the facility repositioned the sand filter backwash pipes to discharge to the primary clarifier, instead of the final effluent channel.

For the nutrient addition system at wastewater treatment, the Permittee found that solids accumulating in the ammonium polyphosphate storage tank caused the plugged line. The Permittee transferred the solution into temporary storage totes separate from the tank's spill containment system. Recommended during the inspection that the facility use some type of spill containment around these temporary totes. Soon after the inspection, the Permittee transferred the solution from the tote back into the cleaned tank, and removed the temporary totes.

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
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 1/22/13

**ANNOUNCED** Inspection

Date	Flow (mgd)		Temp (F)		pH (s.u.)		BOD (mg/L)		BOD (lbs/day)		COD (mg/L)	COD (lbs/day)
	Avg	Max	Avg	Max	Min	Max	Avg	Max	Avg	Max		
Nov-11	6.6	7.0	79	82	7.7	8.4	10.2	27.8	568	1,554	4.5	264
Dec-11	7.3	6.7	76	79	7.9	8.3	8.7	28	489	1,566	5.6	300
Jan-12	6.7	7.2	75	78	7.9	8.1	11.1	24.4	627	1,452	8.2	465
Feb-12	6.5	7.1	70	76	7.9	8.2	10.1	42	550	2,343	6.1	308
Mar-12	6.4	6.7	71	76	8.1	8.3	6	13	332	701	5	260
Apr-12	6.6	7.2	76	79	8	8.3	12	26	654	1,472	16.1	912
May-12	6.6	7.0	73	77	7.6	8.2	12	29	690	1,580	8.5	464
Jun-12	6.4	6.7	75	78	7.9	8.2	10.6	27.4	570	1,465	9.1	497
Jul-12	6.5	6.9	77	80	7.9	8.2	9	18	491	976	9	459
Aug-12	6.5	7.0	79	84	7.7	8.2	7.7	23.6	421	1,352	11	610
Sep-12	6.6	7.0	80	83	8	8.3	7.3	18.2	400	977	7.7	451
Oct-12	6.6	7.2	78	81	8.1	8.2	7.1	21.8	388	1,132	19.2	1053
Nov-12	6.7	7.1	78	80	8.1	8.2	11.1	28.3	613	1,521	6.1	343

Min	6.4	6.7	70.0	76.0	7.6	8.1	6.0	13.0	332	701	4.5	260
Avg	6.6	7.0	75.9	79.5	7.9	8.2	9.5	25.2	523	1,392	8.9	491
Max	7.3	7.2	80.0	84.0	8.1	8.4	12.0	42.0	690	2,343	19.2	1053

Nov-Feb Limits	-	-	-	-	5	9	-	-	3,530	6,655	-	-
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Mar-Oct Limits	-	-	-	-	5	9	-	-	1,101	1,555	-	-
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Date	TSS (mg/L)		TSS (lbs/day)		NH3-N (mg/L)	NH3-N (lbs/day)	Total P (mg/L)		Total P (lbs/day)		Total Reactive P (mg/L)	
	Avg	Max	Avg	Max			Avg	Max	Avg	Max	Avg	Max
Nov-11	8	16	425	898	0.23	12	0.23	0.38	12.96	21.12	0.09	0.22
Dec-11	10	66	542	3,692	0.15	7.4	0.18	0.27	10.3	15.9	0.05	0.08
Jan-12	8	42	462	2,377	0.05	3	0.18	0.36	9.77	19.66	0.07	0.25
Feb-12	10	32	532	1,785	0.06	3.09	0.2	0.48	10.4	26.6	0.05	0.1
Mar-12	9	38	499	1,971	0.07	3.74	0.18	0.45	9.62	25.02	0.09	0.35
Apr-12	12	38	668	2,191	0.07	4	0.18	0.38	9.6	20.4	0.04	0.1
May-12	11	38	632	2,116	0.06	3	0.16	0.42	8.58	22.81	0.08	0.26
Jun-12	14	27	756	1,454	0.08	4.2	0.22	0.62	12.1	33.88	0.11	0.43
Jul-12	10	43	544	2,454	0.14	7.22	0.23	0.46	12.4	25.63	0.13	0.32
Aug-12	10	31	556	1,776	0.12	6.41	0.14	0.24	7.55	12.95	0.08	0.16
Sep-12	10	25	569	1,356	0.14	8.2	0.17	0.31	9.6	17.5	0.12	0.28
Oct-12	7	23	387	1,261	0.08	4.69	0.1	0.2	5.29	11.47	0.04	0.07
Nov-12	8	16	452	896	0.06	3.22	0.14	0.44	7.93	26.02	0.02	0.05

Min	7	16	387	896	0.05	3.00	0.10	0.20	5.29	11.47	0.02	0.05
Avg	10	33	540	1,864	0.10	5.40	0.18	0.39	9.70	21.46	0.07	0.21
Max	14	66	756	3,692	0.23	12.00	0.23	0.62	12.96	33.88	0.13	0.43

Nov-Feb Limits	-	-	6,392	12,070	-	-	-	-	24.7	49.7	-	-
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Mar-Oct Limits	-	-	4,525	8,450	-	-	-	-	24.7	49.7	-	-
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Date	Total Reactive P (lbs/day)		Hardness (mg/L)	Cd (ug/L)		Pb (ug/L)		Zn (ug/L)	
	Avg	Max		Avg	Max	Avg	Max	Avg	Max
Nov-11	4.79	11.5	149.5	B	B	1.01	1.01	97.7	97.7
Dec-11	2.6	4.5	150.4	B	B	B	B	105	105
Jan-12	4.01	13.65	160	B	B	B	B	92.7	92.7
Feb-12	2.6	5.4	147	B	B	B	B	61.4	61.4
Mar-12	5.02	19.46	152	B	B	B	B	96.7	96.7
Apr-12	2.4	5.5	151	B	B	1.1	1.1	84.2	84.2
May-12	4.15	14.12	152	B	B	B	B	84.3	84.3
Jun-12	6.11	23.5	153	B	B	1.57	1.57	97.2	97.2
Jul-12	7.24	17.83	140	B	B	1.3	1.3	88	88
Aug-12	4.54	8.88	138	B	B	1.44	1.44	B	B
Sep-12	7.9	15.8	152	B	B	2.2	2.2	104	104
Oct-12	2.27	4.1	148	B	B	1.44	1.44	61.6	61.6
Nov-12	1.1	2.96	144.2	B	B	B	B	7.9	7.9

Min	1.10	2.96	138	-	-	1.0	1.0	7.9	7.9
Avg	4.21	11.32	149	-	-	1.4	1.4	81.7	81.7
Max	7.90	23.50	160	-	-	2.2	2.2	105.0	105.0

Nov-Feb Limits	-	-	-	2.8	4.1	20	29.1	203	296
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Mar-Oct Limits	-	-	-	2.8	4.1	20	29.1	203	296
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