

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2
Enforcement and Compliance Assurance Division
Region 2 Water Compliance Branch
Clean Water Act (CWA) Inspection Report

Program: Industrial Individual Permit	Inspection Type: Compliance Evaluation Inspection
Permittee Name: Finch Paper, LLC	NPDES/ICIS No.: NY0005525
Inspection Entry Date: April 25, 2024 Inspection Entry Time: 9:30 AM	Inspection Exit Date: April 26, 2024 Inspection Exit Time: 4 : 3 0 P M
Facility Inspected: Finch Paper, LLC 1 Glen Street, Glens Falls NY 12801 Lat, Long: 43.310556, -73.636389 NAICS / SIC Code: 2611 (Pulp Mills), 2621 (Paper Mills) MSGP Permit Tracking No. NYR00F582	
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Responsible Official: Sandra L. LeBarron, Director of EHS and Security (518) 793-2541, ext 217, slebarron@finchpaper.com , Finch Paper, LLC, 1 Glen Street, Glens Falls NY, 12801	
Name and Signature of Inspector  Murray Lantner, P.E., Environmental Engineer, Acting Section Supervisor, CWACS	Agency/Office/Phone Number Digitally signed by MURRAY LANTNER Date: 2025.02.03 17:49:50 -05'00' USEPA/ECAD/WCB/212.637.3976
Name & Signature of Management Reviewer  Justine Modigliani, P.E. Acting Branch Mgr., Water Compliance Branch	Agency/Office/Phone Number Digitally signed by JUSTINE MODIGLIANI Date: 2025.02.22 14:01:19 -05'00' USEPA/ECAD/WCB/212.637.4268

A. INTRODUCTION

On April 25 and 26, 2024, representatives of the United States Environmental Protection Agency (“EPA”), Region 2, along with a representative of the New York State Department of Environmental Conservation (“NYSDEC”) Region 5, conducted a Compliance Evaluation Inspection (“CEI” or “Inspection”) of Finch Paper, LLC., located at 1 Glen Street, Glens Falls, New York (the “Site” or “Facility”). The objective of this visit was to determine compliance with the Facility’s New York State Department of Environmental Conservation (“NYSDEC”) State Pollutant Discharge

Elimination System (“SPDES”) Permit number NY0005525 (the “Individual Permit” or “Permit”) and its NYSDEC Multi Sector General Permit for Stormwater Associated with Industrial Activity (GP-0-23-001) (“MSGP” Tracking No. NYR00F582). SPDES permits are issued pursuant to Section 301 and 402 of the CWA and accompanying state regulation and law. The current version of the Individual Permit became effective on August 1, 2022, and will expire on July 27, 2027.

The Facility processes hardwood and softwoods first by cutting logs, debarking and chipping in the wood yard/wood room. Wood chips go through the ammonium bisulfite pulping process (not the Kraft Process). The brownstock pulp is bleached at the bleach plant using hydrogen peroxide, caustic solution, and chlorine dioxide. Spent pulping liquor can be burned in the boilers for energy or can be recovered and fortified using the sulfur burner. The Facility has 9 boilers to generate steam and electricity. Different boilers at the Facility can be burn gas, wood, and/or the spent pulping liquor. Spent pulping liquor is sent to one of four (4) recovery boilers.

Flue gas from the liquor recovery boilers is routed to one (1) of the three (3) ammonium hydroxide absorber towers for sulfur dioxide removal. The sulfur dioxide removed from the flue gas is combined with the ammonium hydroxide to re-form ammonium bisulfite pulping liquor which is returned to the pulp mill digester process.

The plant employs approximately 400 people and operates seven days per week, 24 hours per day. At the time of the inspection, the annual shutdown was scheduled for June 2024. Finch produces approximately 700 tons of paper daily and discharges 15 to 20 MGD of process wastewater from its WWTP.

Sanitary Wastewater from the plant is discharged to the Glens Falls WWTP via the sanitary sewer connection. Potable water is provided by the City of Glens Falls. Water for the Mill is from the intakes on the Hudson River and wells.

The Plant’s discharges are mainly into the Hudson River adjacent to the Facility, some outfalls discharge into the feeder canal tributary to the Hudson River. The plant also has an internal outfall 08A to monitoring compliance with the requirements of 40 CFR 430 pulp and paper categorical standards. Upon arrival, the EPA Inspector’s presented their credentials to the Facility representatives.

The Wastewater Treatment Plant consists of a lagoon that can receive pulp mill rejects (pulp mill rejects can either be sent to the reject lagoon or be sent to the primary clarifier based on operational needs), neutralization, defoamer, primary clarifiers (3 units), aeration basins (2 units) with mechanical aerators, and final clarifiers (3 units) which flows to Outfall 008. Sludge is sent to thickeners (2 units) and belt presses. Pressed sludge is sent to a landfill (Green Ridge RDF in Gansevoort, New York). Sludge thickener overflow is sent back to the WWTP (See WWTP diagram below). Chlorine can be added into the Return Activated Sludge to control filamentous growth. Facility representatives stated that the chlorinator, which was not operational for a period of time, was back on-line and allows for control of filamentous growth.

During the inspection, all of the surface aerators in the aeration basins were running. The Facility representatives stated that a cleanout of the sludge from the aeration basins was done last in 2001 during a strike.

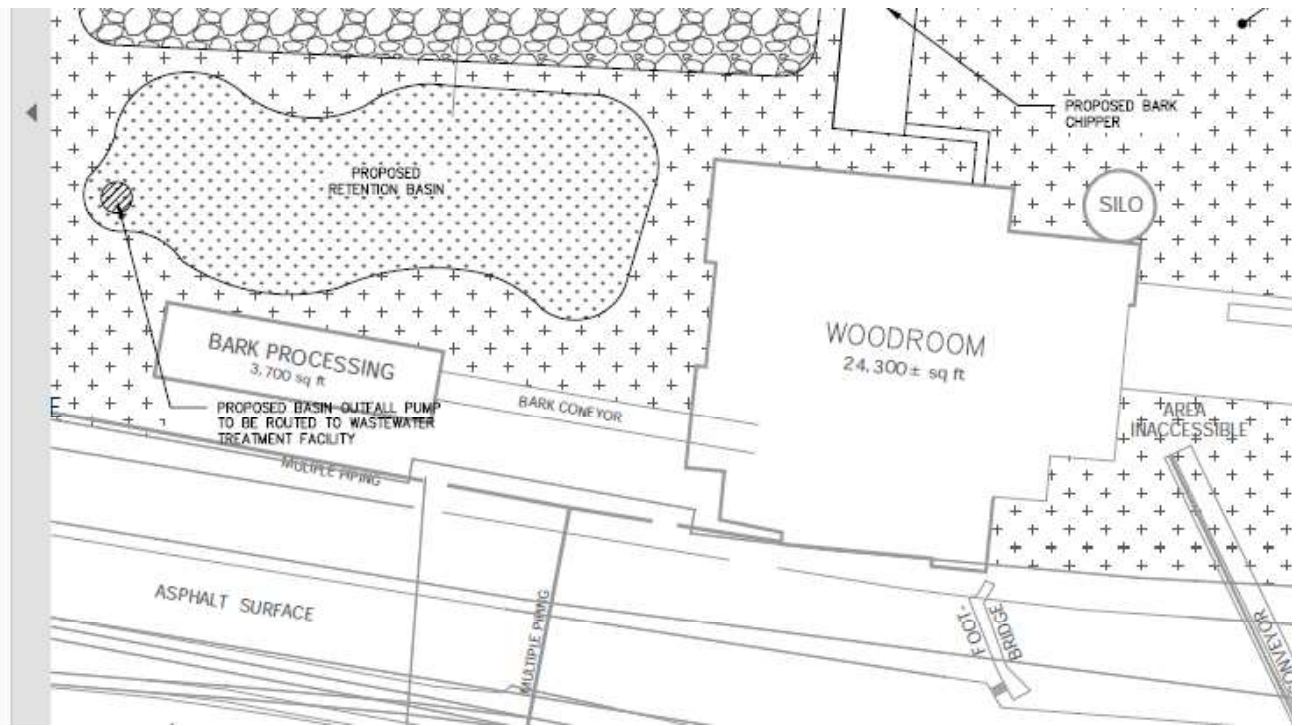
SPDES Permit samples are analyzed by a contract laboratory – Pace Analytical - Westbrough MA, Summit Environmental Laboratories – Cuyahoga Falls (Adsorbable Organic Halides – AOX, Polychlorinated Phenols per 40 CFR 430).

B. POTENTIAL NONCOMPLIANCE ITEMS

- # Finch Paper, LLC - NY0005525 – Compliance Evaluation Inspection Report

pollutants to the waters of State through plant site runoff; spillage and leaks; sludge or waste disposal; and storm water discharges including, but not limited to, drainage from raw material storage. The Facility has developed a SPDES BMP Plan, as required by the Permit, dated January 2015 and revised January 2019, as well as a Pulp and Paper (Spent Pulping Liquor) BMP Plan from 2015 (40 CFR 430.03) that was updated in December 2023. It also has a Stormwater Pollution Prevention Plan (SWPPP) for the MSGP dated March 2015 that was updated in May 2023. At the time of the inspection, the Facility was not being properly operated and maintained and/or was not meeting the terms of the BMP portion of the Permit and its BMP Plan as described below:

- a. There were material storage piles south of the bark processing facility near the feeder canal as shown in Photo DSCN4123 ("123"). During the inspection the Facility began removing the woody material back inside the bark storage area berm. The wood room area, inside the berms, was said to have a sump and pump station to pump water from this area into the wastewater treatment system. Note that stormwater outside of the berm such as in the photos 123 and 126 (Att. 1) would not be collected in the sump and pump station. The 2019 BMP Plan states that the 2023 SWPPP should be referred to for Best Management Practices pertaining to Stormwater Discharges in this area. The SWPPP does not identify wood or bark storage south of the of the debarker, or southwest of the wood room, as shown in the SWPPP Site Map below.



- b. As shown in photos 219 and 220 (Att 1) there were gaps in the block wall between the chip storage piles and the feeder canal which could allow stormwater flow from the chip piles into the canal. Facility representatives said that stormwater from the chip and log storage area is designed to be collected and sent to the Facility's WWTP, and stormwater from this area is not supposed to discharge. Facility representatives stated that the block wall was installed to prevent equipment from

entering the canal and not designed as a stormwater BMP. Nonetheless, stormwater from this area must be contained and sent to the WWTP or infiltrated and not discharged to the canal through the block wall.

- c. As shown in photo 126 in Attachment 1, there are wood chip piles and material near the feeder canal.
- d. The Facility representatives stated that there had been no removal of sludge from the aeration basins since 2001. Facility representatives indicated that there may be an egg-carton like sludge level buildup in the aeration basins, with the sludge free zones near mixers and then sludge build-up in between the mixers. In order to properly operate and maintain the aeration basins, the Facility must determine the extent of sludge buildup in the aeration basins, and how much of the basin volume is occupied by sludge. Excessive sludge buildup will reduce the wastewater detention time in the aeration basin. Additionally higher flows through the basin could potentially scour out solids from the aeration basins to the clarifiers (or beyond). The Facility representatives indicated that sludge level in the aeration basin could be monitored by boat during the planned shutdown.
- e. There were solids seen at the weirs in the secondary clarifiers No. 2 and 3 (See Photo 135, Att. 1 clarifier No. 3), clarifier No. 2 and 3 Photos 131 to 135. Facility representatives explained that weir cleaning activities commence in the spring and are not conducted in the winter and weir cleaning was to begin the following week.
- f. As shown in photos 136 to 138 (Att. 1), there was spilled lime on ground near the Facility fence, south of the WWTP. The lime was cleaned up during the inspection by Finch Personnel.
- g. Gravity Thickeners – There are two (2) gravity thickeners that receive sludge flows from the clarifier.
 - i. As documented in photos 145 to 148 (Att.1), there were solids flowing over the weirs and blocking some of the weirs of gravity thickener No. 2 and there was bubbling (potentially septic conditions) within thickener No. 2. The Facility representatives stated that they would consider addressing this issue during the planned shutdown and potentially altering standard operating procedures to draw down thickener sludge more and potentially chlorinate the thickener.
 - ii. As documented in photos 150 to 152 (Att.1), there was as sludge buildup by the wall of gravity thickener No. 1 and the flow over the weirs was highly unbalanced. The Facility may need new or balanced weir plates to correct the uneven flow.
 - iii. As shown in photos 149 and 153 through 155 (Att. 1), there had been an overflow of the splitter box at the gravity thickeners. As shown in photo 149 the material was said to be collected in the sump area in photo 159 which is returned into the wastewater treatment system.

The Facility representatives reported that there was a recent pulp mill upset that may have impacted the sludge thickeners and sludge levels.

- h. As shown in photos 159 to 161 (Att. 1), wastewater treatment solids are on the roadway near the sludge press building. This material flows downslope towards a collection area with a pump that returns flow back to the wastewater treatment system.
 - i. As shown in photograph 167 (Att. 1), the center ring of primary clarifier No. 2 was submerged because clarifier No. 2 is being fed at a higher rate than primary clarifier No. 3. Primary clarifier No. 3 had high torque on the clarifier rake and the sludge was being wasted from this clarifier to bring down sludge levels and reduce the torque on the rake. The Facility representatives said that the high clarifier sludge levels were due to a pulp mill/wood chip/upset over the past weekend. They said that they do typically try to balance the flow through the clarifier. There was a discussion of how Finch decides whether to send pulp mill rejects to the WWTP or whether to send it to the Reject Lagoon and whether the Reject Lagoon had sufficient capacity, especially when operational problems are caused by the rejects at the WWTP.
 - j. Facility representatives stated that the feeder canal water (approximately 1 MGD depending on canal levels) enters into the wastewater treatment collection system via Inflow and Infiltration (“I&I”). I&I was said to occur when water levels exceed 279 on the gauge near the plant entrance. The NYSDEC AOC required Finch to evaluate the condition of the paper mill and pulp mill wastewater collection system and make repairs and upgrades to prevent unauthorized discharges. Facility representatives said that I&I can be tracked using pump cycles/pump run times and WWTP flows.
2. As shown in photos 171 to 173 (Att. 1), the Facility has installed a collection system for groundwater that seeps down towards the river. Some of the groundwater seeps are not collected in the pipes and enter puddles along the river and can ultimately enter the Hudson River during higher river flows. The Groundwater was said to have been sampled and identified indicators of process wastewater contaminants (Ammonia, pH, Temperature). This is not a Permitted outfall under the Permit and discharges are not authorized under the Permit or Section 301 and 402 of the CWA. A leak of powerhouse wastewater was reported to NYSDEC on November 6, 2023, due to a leak in the powerhouse trench causing foaming in the Hudson River (Att.2).
3. Review of EPA’s Enforcement and Compliance History Online (ECHO) database identified the following two self-reported effluent exceedances over the period January 2022 to October 2024.

Table 1: Finch Paper Reported Permit Exceedance (January 2022 to October 2024)

NY0005525: FINCH PAPER LLC, GLENS FALLS, NY 12801

From EPA’s Enforcement and Compliance History Online (“ECHO”) database

Monitoring Period	Outfall	Parameter Description	Units	Limit Type	Permit Limit	DMR Value	DMR Value Qualifier
1/31/2022	008-A	BOD, 5-day, 20 deg. C	kg/d	DAILY AV	10,650	3,007	>
2/28/2022	008-A	Nitrogen, Kjeldahl, total (as N)	kg/d	DAILY MX	4,540	5,942	=
5/31/2022	008-A	BOD, 5-day, 20 deg. C	kg/d	DAILY MX	20,474	22,207	=
7/31/2022	008-A	Nitrogen, Kjeldahl, total (as N)	kg/d	DAILY MX	4,540	7,511	=
8/31/2022	008-M	Nitrogen, Kjeldahl, total (as N)	kg/d	DAILY MX	4,540	6,511	=
8/31/2022	11A-M	Temperature, water deg. fahrenheit		DAILY MX	110	112	=
11/30/2022	012-M	Temperature, water deg. fahrenheit		DAILY MX	110	112	=
12/31/2022	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	50,162	=
1/31/2023	008-M	Nitrogen, Kjeldahl, total (as N)	kg/d	DAILY MX	4,540	6,920	=
2/28/2023	008-M	BOD, 5-day, 20 deg. C	kg/d	DAILY MX	24,516	28,996	=
2/28/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	77,729	=
2/28/2023	008-M	Nitrogen, Kjeldahl, total (as N)	kg/d	DAILY MX	4,540	6,139	=
3/31/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	48,437	=
4/30/2023	008-M	Nitrogen, Kjeldahl, total (as N)	kg/d	DAILY MX	4,540	7,806	=
5/31/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	40,573	=
6/30/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	59,633	=
10/31/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	46,671	=
11/30/2023	008-M	BOD, 5-day, 20 deg. C	kg/d	DAILY MX	24,516	72,132	=
11/30/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	58,853	=
11/30/2023	012-M	Temperature, water deg. fahrenheit		DAILY MX	110	112	=
12/31/2023	008-M	BOD, 5-day, 20 deg. C	kg/d	DAILY MX	24,516	30,910	=
12/31/2023	008-M	Solids, total suspended	kg/d	DAILY MX	34,504	86,548	=

Monitoring Period	Outfall	Parameter Description	Units	Limit Type	Permit Limit	DMR Value	DMR Value Qualifier
3/31/2024	008-M	BOD, 5-day, 20 deg. C	kg/d	DAILY MX	24,516	7,333	>
8/31/2024	008-M	BOD, 5-day, 20 deg. C	kg/d	MO AVG	12,712	1,735	>

Review of the reports of non-compliance indicated that many of the TSS and BOD exceedances from December 2022 to December 2023 were due to solids settling difficulties in the secondary clarifiers. There was also an inoperable chlorinator (used to control filamentous growth) during much of this period.

C. AREAS OF CONCERN

1. As shown in photo 140, (Att. 1), there was a dry weather flow in the corrugated sewer in the round manhole in the southeast portion of the Facility south/southeast of the final clarifiers. The flow was said to go to Outfall 033 into the Hudson River. The Facility representative said that they would monitor the flow for total residual chlorine (“TRC”) to determine if this flow was associated with a drinking water leak.
2. In the eastern portion of the Facility, as shown in Attachment 1, photo 142, there are some materials stored outside in areas that can drain to storm water outfalls. As shown in Photos 143 and 144 (Att. 1) there is old equipment stored outside adjacent to the fence. On the opposite side of the fence is a wooded area that leads down to the Hudson River.
3. As shown in photo 175(Att. 1), there is an outdoor sulfur storage pile that is exposed to rainfall. Storm drainage in this area was said to flow to the WWTP and not to stormwater outfall (Outfall 036), nonetheless the Facility should keep this pile covered or indoors to avoid additional pollutants entering the WWTP.
4. The wastewater treatment plant does not have an emergency generator to run the plant during power outages. Facility representatives indicated that the power in the area is stable and that if there were power outages it would also shut down plant operations. Because the plant does have its own power plant if there is a National Grid power outage then the plant would not have electricity.
5. The sludge presses in the press room were running. The Facility is planning on installing another sludge press to be able to process WWTP sludge more quickly. The new press was on-site but was not yet assembled or operational. Verify that the new press and older presses are now all operational, and that they can be run simultaneously.
6. As shown in photos 182 to 186 (Att. 1), there is secondary containment for the spent pulping liquor tanks. Landfill leachate is also brought in and stored in tanks. At the time of the inspection, the drain valves on the secondary containment were open due to tank cleaning operations. The cleaning activities and secondary containment were said to be supervised when the secondary containment valves are open. The Facility representatives also indicated that the 4” outlet pipe from the secondary containment would also slow the flows to the WWTP in the event of a spill. Note that the BMP Plan requirements in 40 CFR Part 430.03.c.(7) specify “the Finch Paper, LLC - NY0005525 – Compliance Evaluation Inspection Report

mill must install and maintain secondary containment (i.e., containment constructed of materials impervious to pulping liquors) for spent pulping liquor bulk storage tanks equivalent to the volume of the largest tank plus sufficient freeboard for precipitation. An annual tank integrity testing program, if coupled with other containment or diversion structures, may be substituted for secondary containment for spent pulping liquor bulk storage tanks.” Section 4.3.1 of Finch’s Spent Pulping Liquor BMP Plan (updated December 2023) specifies that the Facility provides “full containment of its tank farm where all spent pulping liquor bulk storage tanks are located.”

7. Outfall Summary with Potential Non-Compliance (PNC) and Areas of Concern (AOC)

Par No.	Outfall	Description	Potential Non-Compliance or Areas of Concern
a.	008	Process wastewater discharge from the WWTP. The discharge from 008 flows into a diffuser below the surface of the Hudson River. The continuous pH meter read 7.82 and 7.85 (photo 157, Att. 1). Following the inspection Finch provided information that the calibration of the continuous pH meters is checked by comparing the continuous flow meter result, with the result of a grab sample using a calibrated pH meter back in the lab. If there is a difference of more than 0.3 standard units, an emergency work order is entered and the probe is calibrated. Finch provided records of emergency work orders for the 008 effluent pH meter for 4/15/24 (recalibrated on 4/18/24), 4/10/24 (recalibrated 4/10/24), 4/9/24 (corrected 4/9/24), and 3/24/24 (recalibrated 3/24/24). The continuous effluent ammonia concentration during the inspection was 1.27 mg/L The continuous temperature probes read 82°F and 86°F (Photo 157, Att. 1), the 82°F is considered the official result from the calibrated temperature probe. An annual PM work order for the temperature probe January 2023 and 2024 along with a calibration check in May 2024 was provided to EPA following the inspection. The Flow at Outfall 008 is not measured with an effluent flow meter it is a calculation based on influent flow to the WWTP, the reject line flow, and the mill water flow to the press. The WWTP influent flow magmeter is on an annual PM for calibration (by checking the zero). Finch provided WWTP Influent flow calibration records for April 3, 2024, December 6, 2022, and May 4, 2021. Based on records provided the flow meters for the reject flow and mill water to the press is not calibrated.	AOC – The flow meters for the reject flows (reject lagoon) and mill water to the presses (which are used in the 008 flow calculations) do not appear to be calibrated or checked periodically. Please ensure calibrations per manufacturer’s specifications as applicable. AOC – It took 3 days to recalibrate the continuous pH meter for 008 on 4/15/24. Other recalibrations were conducted on the same day in March and April 2024.

Par No.	Outfall	Description	Potential Non-Compliance or Areas of Concern
		The composite sampler for outfall 008 in photo 158 (Att. 1) was cool, and there is a thermometer in a beaker of water.	
b.	Outfall 08A	Outfall 08A – bleach plant internal outfall (where 40 CFR 430 requirements are applied). The outfall is from a tap off of a piped flow off of the bleach plant wastewater pipe that normally flows with mill water. For monitoring days the mill water flow is valved off to convey bleach plant wastewater for monitoring purposes (See Photo 176, Att. 1). Composite samples are done by taking a sample every 4 hours (6x per day) for a 24-hour period.	N/A
c.	009	Stormwater to Hudson River	AOC – Verify where the flow to 009 comes from.
d.	011	Non-contact Cooling Water (NCCW) fresh water overflow Hudson River Via Tail Race No. 5. The Total Residual Chlorine DPD packets expired July 2019 as seen in photos 238 and 239 (Att. 1). TRC monitoring is required at Outfalls 011, 011A, 012. There was said to be a continuous temperature probe for Outfalls 011 and 012, but calibration records/information on temperature probe and information on the flow meter were nee. Calibration records for the temperature probe conducted on May 22, 2024, were provided following the inspection. “Outfall 011 and 012 temperature are required by permit to be a 1x per week grab and daily during July and August. We report the continuous data from the insertion of temperature probes.” Note that the 011 and 012 still require calibration, even if the continuous monitoring is more frequent than the grab samples. TRC sampled during the inspection measured 0.11 mg/l. The TRC limit is 1.3 mg/L. The flow meter for Outfall 011 was not located by EPA. Following the inspection, the Facility provided documentation that the flow meter at 011 is a Signet 2552 Magmeter along with a zero-flow verification conducted on May 22, 2024. Finch also provided a Certificate of Calibration and Conformance for the flow meter on May 28, 2010.	PNC 1. Total Residual Chlorine DPD packets expired on July 2019 and Facility will reorder. As requested by EPA, Finch ran duplicate samples using the New packet and expired packet on May 6, 2024 and the results were 0.09 mg/l and 0.10, respectively. AOC –temperature probes do need periodic calibration. AOC – need to identify where the flow meter is and conduct any needed calibrations per the manufacturers specifications.

Par No.	Outfall	Description	Potential Non-Compliance or Areas of Concern
		There is no sign at Outfall 011. Based on communications with the NYSDEC representative, Outfall 011 has a sign waiver and is not required. The NYSDEC representative is communicating with NYSDEC Central Office on whether a sign waiver for Outfalls 11A and 012 was also granted.	
e.	11A	NCCW fresh water overflow to fish chute when forebay temperatures are over 70°F. Flow is estimated based on the number of turns/notches on the valve.	1.AOC – There is no sign at Outfall 11A – NYSDEC is checking whether a sign waiver was granted for Outfall 11A. 2. Total Residual Chlorine DPD packets expired on July 2019 (see Outfall 011 comment on TRC above)
f.	012	NCCW, fresh-water overflow There was said to be a continuous temperature probe for Outfalls 011 and 012, but calibration records/information on temperature probe and information on the flow meter were not available during the inspection. Calibration records for the temperature probe were submitted on May 22, 2024, following the inspection. The document entitled Finch Paper Outfall Temperature Calibrations, submitted to EPA following the inspection states, “Outfall 011 and 012 temperature are required by permit to be a 1x per week grab and daily during July and August. We report the continuous data from the insertion of temperature probes.” Note that 011 and 012 temperature probes do require calibration, even if the continuous monitoring is more frequent than the grab samples. TRC sampled during the inspection measured 0.54 mg/l. The TRC limit is 1.3 mg/L. The 012 flow meter was not found during the inspection. Following the inspection the Facility provided documentation that the flow meter at 012 is a Signet 2552 Magmeter along with a zero flow verification conducted on May 22, 2024.	AOC – 1. There is no sign at Outfall 012 – NYSDEC is checking whether a sign waiver was granted for Outfall 012 PNC 2. Total Residual Chlorine DPD packets expired on July 2019. New TRC DPD packets were ordered and Facility ran side by side analysis expired and unexpired packets at Outfall 012 on 5/6/24 and the new packet (pillow) result was 0.24 mg/l and the expired pillow result was 0.26 mg/l. AOC – Finch Paper needs to routinely check

Par No.	Outfall	Description	Potential Non-Compliance or Areas of Concern
		Finch also provided a Certificate of Calibration and Conformance for the flow meter on May 28, 2010.	the calibration of its temperature probe.
g.	013	SW outfall	N/A
H	014	SW Outfall 014, photos 189 and 190 (Att. 1), no discharge during the inspection	N/A
i.	021	SW and Screen Wash Water. Flow Rate estimate is based on intake effluent.	N/A
j.	022	SW outfall, No Flow, See Photo 248, (Att. 1), drains parking area	N/A
k.	023	Stormwater Outfall – from roadway drain, No Flow during the inspection – See photo 249, Att. 1	N/A
m.	025	SW – No Flow during inspection. There was some sediment and leaves near the storm drain (See Photo 191, Att. 1)	AOC – sweep, improve housekeeping.
n.	026	SW – No Flow during inspection, sediment was seen and needs to be removed. Outfall channel needs to be stabilized	AOC – sediment buildup – needs housekeeping,

Par No.	Outfall	Description	Potential Non-Compliance or Areas of Concern
		(See Photos 187 and 188, Att. 1)	and outfall channel needs stabilization.
o.	Outfalls 037 to 041	These outfalls (037-041) are blocked and now flow to Outfall 042. Outfall 042 is now said to be pumped to the WWTP.	N/A
p.	Outfall 042	The sump pumped to the Wastewater Treatment Plant and does not typically discharge. Buildup of sludge from sludge processing and thickener overflows accumulated on the ground.	AOC – buildup of sludge accumulated on the ground.
q.	Outfall 030	Att. 1 (photo 192) sediment near storm inlet that leads to Outfall 030. Note in the loading dock area there was a white PVC pipe entering the catch basin in photo 194 (need to determine source of pipe) Trench drains in loading area have sediment building (see photos 195 and 196) Photos at Outfall 030 identify unstabilized materials near the pipe Following the inspection the Facility provided a photograph of cleaning catch basins with a Vactor. (See Att.3)	AOC – sediment near storm inlet. AOC – PVC pipe entering catch basin in loading dock area, determine if allowable stormwater source. AOC – unstabilized materials near pipe.
r.	029	Outfall 029 pipe was collapsed at the time of the inspection, and there was loose sediment near outlet. The pipe must be properly operated and maintained to stop erosion of the soils.	PNC
s.	034	No flow during the inspection. 034 contains from roof drains	N/A
t.	028	No Flow from Outfall 028	N/A

8. As shown in photos 245 and 246 (Att. 1), there is a flood rain inside the intake building with debris and material around it. Ensure that this drain goes to the wastewater treatment plant, and if not, ensure that this material is cleaned up and removed and necessary protections for the drain put in place.
9. During the inspection, the Facility representatives said that a Vactor truck hauling spent liquor had a spill on the pavement that was said not to have reached an outfall.

10. No. 2 lift station receives flow from the groundwater collection area along the Hudson River. As shown in the photos 216 to 218(Att. 1), the area around the No. 2 lift station needs improved housekeeping/maintenance. EPA observed water on the ground near the tarps.
11. Groundwater discharge was coming out of wall and pump next to wall. Water was “spitting” out in the river - next to paper mill. According to Facility representatives, in the past this location had occasional oil coming from it. This groundwater was being captured because this groundwater occasionally contained oil. Contaminated groundwater is not authorized by the Permit to discharge from this location. See Photo 207 and 208 in Attachment 1.
12. As shown in photos 221 and 222(Att. 1), there were loose soils adjacent to the canal on the south side of the canal.
13. The Facility representatives explained that monthly inspections of catch basins are conducted. The Facility must ensure that catch basins that require maintenance/cleaning are identified during these inspections and also ensure that follow up is being conducted.
14. EPA observed a gap in the fish return pipe for returning fish from the intake screens. The pipe needs to be closed so fish don't fall on the floor. The Facility has put in a work order to remove a valve and close the pipe opening.
15. The Stormwater Pollution Prevention Plan (“SWPPP”) stated that waste dumpsters would be kept covered. There were open dumpsters at a Facility.
16. The SWPPP for the Facility states that sweeping of roadways the woodyard would be conducted annually. The Facility needs to verify that street sweeping is taking place annually and should also evaluate whether portions of the Facility should be swept more frequently than once per year. The SPDES BMP Plan, and the catch basin inspections, should identify the frequency of conducting street sweeping in the rest of the Facility.
17. 40 CFR 430.03 requires Best Management Practices (BMPs) for spent pulping liquor, soap, and turpentine management, spill prevention, and control.
 - a. As described in the spill report from the November 6, 2023, incident (Att. 2) there was a discharge of untreated process wastewater associated with the power house trench. 40 CFR §430.03.(c)(5) specifies that *“[t]he mill must prepare a brief report that evaluates each spill of spent pulping liquor, soap, or turpentine that is not contained at the immediate process area and any intentional diversion of spent pulping liquor, soap, or turpentine that is not contained at the immediate process area. The report must describe the equipment items involved, the circumstances leading to the incident, the effectiveness of the corrective actions taken to contain and recover the spill or intentional diversion, and plans to develop changes to equipment and operating and maintenance practices as necessary to prevent recurrence. Discussion of the reports must be included as part of the annual refresher training.”*

Provide an explanation of whether the November 6, 2023, event involved the discharge of spent pulping liquor from the power-house trench/sewer. And if so, whether trenches, sewers and pipes conveying spent pulping liquor have been evaluated (e.g. CCTV, etc) to determine the integrity of these sewers and to initiate repair as necessary to prevent

recurrence consistent with 40 CFR §430.03(c)(5).

- b. 40 CFR §430.03(f) requires the establishment of Lower Action Levels (“LALs”) and Upper Action Levels (“UALs”) for detecting spent pulping liquor spills. Per its 40 §430 BMP Plan it has established UALs and LALs based upon daily composite monitoring of Total Organic Carbon. The regulations requires that each mill subject to this section must report to the NPDES permitting or pretreatment control authority the results of the daily monitoring conducted pursuant to paragraph 40 CFR §430.03(i)(4). It requires submittal of reports to include a summary of the monitoring results, the number and dates of exceedances of the applicable action levels, and brief descriptions of any corrective actions taken to respond to such exceedances. Submission of such reports shall be at the frequency established by the NPDES permitting or pretreatment control authority, but in no case less than once per year. Based on the 2023 revision of the Spent Pulping Liquor (40 CFR 430.03) BMP Plan, there were the following exceedances of the Total Organic Carbon (“TOC”) UALs and LALs during the period May to Dec 2023. Please provide brief descriptions of any corrective actions taken in response to the UAL exceedances and investigations related to LAL Exceedances.

Table 2 – Wastewater Treatment Plant Influent TOC 7-Day Rolling Average –

WTP Influent Rolling 7 Day Avg. TOC – LAL and UAL exceedances LAL 425 mg/l, TOC UAL 450 mg/l LAL and UAL Exceedances May 4, 2023 to November 30, 2023	WTP Influent TOC Loading – 7 Day Rolling Average (lbs/day) – LAL and UAL Exceedances LAL – 53,825 lbs/day* UAL – 67,281 lbs/day* LAL and UAL exceedances Dec. 2022 to April 2023 (*the order sorted data had dates in the prior monitoring period – which likely had different LALs and UALs)
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8/7/2023	425	3/31/2023	53455	142
11/22/2023	425	1/27/2023	53501	143
10/7/2023	425	3/18/2023	53628	144
11/11/2023	426	1/23/2023	53657	145
6/19/2023	426	3/16/2023	53825	146
11/7/2023	426	4/1/2023	53999	147
6/16/2023	427	4/20/2023	54084	148
6/17/2023	431	3/17/2023	54522	149
11/16/2023	431	1/24/2023	55003	150
8/4/2023	431	4/8/2023	55436	151
6/15/2023	432	3/15/2023	55438	152
7/8/2023	432	3/10/2023	56534	153
7/15/2023	433	2/27/2023	56623	154
7/7/2023	433	4/12/2023	57168	155
5/9/2023	433	3/13/2023	57186	156
8/6/2023	433	3/12/2023	57187	157
11/28/2023	435	3/11/2023	57235	158
11/9/2023	435	3/14/2023	57475	159
6/18/2023	435	1/26/2023	58248	160
10/6/2023	436	1/25/2023	58327	161
9/19/2023	436	3/9/2023	58448	162
10/5/2023	436	10/27/2022	60335	163
6/13/2023	438	10/28/2022	61121	164
8/5/2023	439	10/29/2022	61121	165
6/14/2023	440	2/20/2023	61379	166
5/16/2023	442	4/9/2023	61434	167
11/27/2023	443	10/24/2022	61579	168
11/29/2023	443	2/21/2023	62130	169
11/21/2023	444	2/22/2023	63395	170
11/8/2023	445	4/11/2023	64947	171
11/20/2023	446	2/23/2023	65037	172
11/26/2023	446	10/26/2022	66218	173
9/13/2023	447	4/10/2023	66823	174
9/14/2023	447	2/28/2023	67281	175
7/14/2023	450	10/25/2022	67832	176
10/1/2023	453	2/24/2023	68461	177
11/19/2023	454	2/25/2023	72050	178
10/2/2023	456	2/26/2023	72498	179
7/11/2023	458	3/1/2023	72671	180
5/10/2023	459	3/2/2023	#VALUE!	181
7/13/2023	462	3/3/2023	#VALUE!	182
10/3/2023	463	3/4/2023	#VALUE!	183
7/12/2023	465	3/5/2023	#VALUE!	184
10/4/2023	467	3/6/2023	#VALUE!	185
7/9/2023	468	3/7/2023	#VALUE!	186
9/18/2023	469	3/8/2023	#VALUE!	187
11/23/2023	472	3/24/2023	#VALUE!	188
5/11/2023	473	3/25/2023	#VALUE!	189
9/15/2023	473	3/26/2023	#VALUE!	190
7/10/2023	473	3/27/2023	#VALUE!	191
5/15/2023	477	3/28/2023	#VALUE!	192
11/24/2023	480	3/29/2023	#VALUE!	193
5/12/2023	481	3/30/2023	#VALUE!	194
9/17/2023	485	3/31/2023	#VALUE!	195
5/14/2023	486	4/1/2023	#VALUE!	196
11/25/2023	488	4/2/2023	#VALUE!	197
9/16/2023	489	4/3/2023	#VALUE!	198
5/13/2023	490	4/4/2023	#VALUE!	199
		4/5/2023	#VALUE!	200
		4/6/2023	#VALUE!	201
		4/7/2023	#VALUE!	202
		4/8/2023	#VALUE!	203
		4/9/2023	#VALUE!	204
		4/10/2023	#VALUE!	205
		4/11/2023	#VALUE!	206
		4/12/2023	#VALUE!	207
		4/13/2023	#VALUE!	208

ii. **Table 3** – Power Plant TOC 7-Day Rolling Average Sorted

Power Plant TOC Rolling 7 Day Avg. TOC – LAL and UAL exceedances LAL - 664 mg/l, TOC UAL - 754 mg/l	Power Plant TOC Rolling 7 Day Avg. TOC Loading – LAL and UAL exceedances LAL - 29,073 lbs/day UAL - 30,934 lbs/day
LAL and UAL Exceedances May 4, 2023 to November 30, 2023	LAL and UAL Exceedances May 4, 2023 to November 30, 2023

7/15/2023	664	156	10/11/2023	29073	148
8/23/2023	667	157	6/13/2023	29152	149
9/5/2023	668	158	6/12/2023	29381	150
10/31/2023	669	159	6/16/2023	29386	151
8/5/2023	670	160	10/18/2023	29407	152
7/28/2023	670	161	6/15/2023	29423	153
10/7/2023	670	162	8/24/2023	29445	154
6/19/2023	670	163	9/6/2023	29517	155
11/26/2023	674	164	9/5/2023	29517	156
8/24/2023	680	165	6/11/2023	29544	157
10/5/2023	681	166	10/31/2023	29628	158
9/11/2023	681	167	10/14/2023	29665	159
9/21/2023	682	168	8/2/2023	29736	160
8/27/2023	685	169	11/17/2023	29768	161
10/16/2023	686	170	7/4/2023	29782	162
6/9/2023	688	171	8/21/2023	29825	163
10/9/2023	692	172	8/22/2023	30000	164
8/21/2023	693	173	11/18/2023	30005	165
6/8/2023	694	174	9/22/2023	30094	166
11/28/2023	695	175	10/3/2023	30172	167
7/8/2023	696	176	11/19/2023	30233	168
10/3/2023	700	177	11/24/2023	30274	169
8/22/2023	700	178	11/25/2023	30274	170
7/29/2023	708	179	6/29/2023	30546	171
10/4/2023	709	180	11/26/2023	30710	172
9/10/2023	717	181	11/28/2023	30737	173
8/2/2023	721	182	10/15/2023	30775	174
11/27/2023	729	183	9/8/2023	30891	175
6/10/2023	735	184	9/12/2023	30896	176
9/9/2023	743	185	10/10/2023	30934	177
6/16/2023	744	186	10/12/2023	30981	178
6/15/2023	745	187	9/9/2023	30987	179
7/12/2023	754	188	9/7/2023	30999	180
6/11/2023	764	189	7/8/2023	31000	181
6/12/2023	764	190	10/13/2023	31007	182
6/13/2023	764	191	6/14/2023	31078	183
11/29/2023	765	192	10/9/2023	31177	184
7/14/2023	767	193	10/6/2023	31445	185
7/9/2023	768	194	10/4/2023	31634	186
7/10/2023	771		10/16/2023	31654	187
7/13/2023	777		9/11/2023	31723	188
7/11/2023	783		11/20/2023	32268	189
11/16/2023	783		7/14/2023	32476	190
8/1/2023	791		10/5/2023	32507	191
11/19/2023	808		7/12/2023	32538	192
7/30/2023	809		7/13/2023	32646	193
6/14/2023	815		7/28/2023	32715	194
11/18/2023	824		8/1/2023	32773	195
11/17/2023	826		10/8/2023	32851	196
11/21/2023	879		10/7/2023	33076	197
11/20/2023	893		11/27/2023	33189	198
11/22/2023	927		11/22/2023	33657	
11/23/2023	942		7/11/2023	33670	
7/31/2023	947		7/9/2023	33676	
6/24/2023			7/10/2023	33842	
6/25/2023			11/29/2023	33939	
			9/10/2023	33958	
			11/21/2023	34109	
			7/29/2023	34373	
			7/30/2023	34373	
			11/23/2023	36838	
			7/31/2023	39639	
			6/24/2023		
			6/25/2023		

Table 4 – Pulp Mill Total Organic Carbon, No. 2 Lift Station May 4, 2023, to November 30, 2023

Pulp Mill, No. 2 Lift Station Rolling 7 Day Rolling Avg. TOC – LAL and UAL exceedances LAL - 655 mg/l, UAL - 691 mg/l	Pulp Mill No. 2 Lift Station – 7 Day Rolling Average (lbs/day) – LAL and UAL Exceedances LAL – 22,148 lbs/day UAL – 25,397 lbs/day
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11/3/2023	655	7/24/2023	22264
9/8/2023	655	11/8/2023	22337
10/16/2023	655	5/4/2023	22414
8/16/2023	656	5/23/2023	22707
10/29/2023	656	6/19/2023	23092
10/30/2023	656	5/22/2023	23209
11/20/2023	657	6/8/2023	23285
11/4/2023	657	7/29/2023	23293
11/11/2023	658	5/18/2023	23377
9/28/2023	660	5/19/2023	23422
11/26/2023	660	6/12/2023	23427
10/28/2023	662	5/20/2023	23485
8/6/2023	663	6/10/2023	23500
11/14/2023	663	5/21/2023	23528
9/30/2023	664	6/13/2023	23555
9/29/2023	667	7/25/2023	23703
8/14/2023	667	6/11/2023	23722
11/5/2023	668	6/9/2023	23743
11/13/2023	670	7/13/2023	23795
11/17/2023	671	5/7/2023	23897
11/10/2023	671	5/5/2023	23912
11/6/2023	672	6/14/2023	24017
11/27/2023	672	5/6/2023	24420
11/7/2023	672	7/26/2023	24531
7/14/2023	673	7/28/2023	24545
11/9/2023	676	6/15/2023	24549
11/8/2023	677	5/8/2023	24573
5/10/2023	677	5/17/2023	24591
5/16/2023	677	6/16/2023	25218
11/28/2023	678	7/12/2023	25283
11/16/2023	680	6/29/2023	25321
8/5/2023	686	6/17/2023	25397
8/15/2023	686	5/9/2023	25851
8/4/2023	691	7/27/2023	25952
5/15/2023	693	6/18/2023	26117
11/29/2023	693	7/2/2023	27085
11/18/2023	696	7/1/2023	27346
11/30/2023	696	7/3/2023	27463
5/11/2023	698	6/30/2023	27637
8/2/2023	700	5/16/2023	27691
11/19/2023	704	7/11/2023	27807
8/3/2023	704	5/15/2023	28218
5/13/2023	707	5/10/2023	28361
5/14/2023	708	5/11/2023	28908
7/13/2023	709	5/13/2023	28926
8/1/2023	710	5/14/2023	28982
7/6/2023	711	7/10/2023	29250
7/30/2023	717	5/12/2023	29344
5/12/2023	717	7/6/2023	29514
7/9/2023	718	7/4/2023	29764
7/7/2023	729	7/5/2023	30096
7/31/2023	729	7/7/2023	30164
7/8/2023	744	7/9/2023	30891
7/12/2023	749	7/8/2023	31380
7/10/2023	761		
7/11/2023	782		

18. Outfall 08A Records Review

- a. Review of the Permit for Outfall 08A and the regulations in 40 CFR 430 Subpart E, there appears to be parameters included in 40 CFR Part 430 Subpart E (Ammonium-Based Sulfite Pulps) that are not included in the Permit for Outfall 08A such as 2,4,5-trichlorophenol, 2,4,6 trichlorophenol, and Pentachlorophenol. Review of the laboratory report from December 2023 indicates that Finch did collect a sample and analyze for these 3 parameters.
- b. For the 2,3,7,8 TCDD and 2,3,7,8 TCDF samples collected from the bleach plant effluent Outfall 08A (where chlorine dioxide is used) on October 11, 2023, the chain of custody sheets identified that the samples were cooled to 1.8°C. However, there is no indication that the samples were checked for total residual chlorine (TRC), or that sodium thiosulfate was added per 40 CFR 136.3 Table II, Footnotes 11 and 5, if TRC was present.
- c. Chlorinated Phenolics samples required by the Permit and 40 CFR §430 requires analysis and sampling per EPA Method 1653. For sample preservation, EPA Method 1653 section 8.2 requires dechlorination if there is total residual chlorine in the sample along the addition of sulfuric acid. The chain of custody for the samples taken on October 4, 2023, at Outfall 08A indicated that sulfuric acid was added, but does not indicate if total residual chlorine was checked or that sodium thiosulfate was added per section 8.2 of EPA Method 1653.

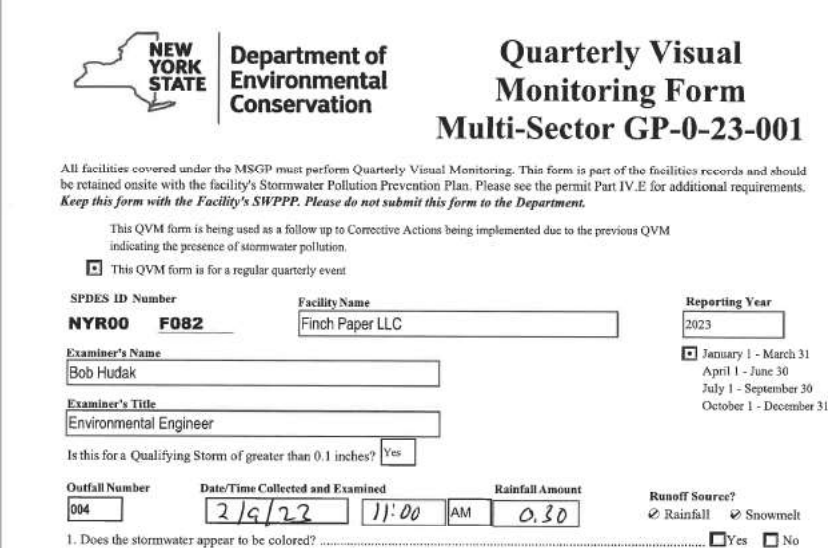
19. The Short-Term High-Intensity Monitoring Program for Lead required by the Schedule of Submittals on Page 11 of 24 of the Permit was conducted and 10 lead samples were collected and analyzed. The Permit requires that the Permittee shall use the approved analytical method with the lowest possible detection limit as promulgated under 40 CFR Part 136. The information provided by Finch, seen in the table below, states that EPA Method 3005A was used for sample preparation and EPA Method 200.8 was used for analysis. 40 CFR Part 136 does not authorize the use of EPA Method 3005A for lead, but it does authorize EPA Method 200.8. The results were reported by Finch as shown in the table below.

Table 5 - Short-Term High-Intensity Monitoring Program for Lead Results

Lead, Total	Date	Result (PPM)	MDL (PPM)	Prep Method	Analytical Method
1	August 9, 2022	0.00126	0.00034	EPA 3005A	3,200.8
2	August 16, 2022	<0.00171	0.00171	EPA 3005A	3,200.8
3	August 23, 2022	0.00212	0.00034	EPA 3005A	3,200.8
4	August 30, 2022	<0.00171	0.00171	EPA 3005A	3,200.8
5	September 6, 2022	0.00165	0.00034	EPA 3005A	3,200.8
6	September 13, 2022	<0.00171	0.00171	EPA 3005A	3,200.8
7	September 20, 2022	<0.00343	0.00343	EPA 3005A	3,200.8

8	September 27, 2022	0.00475	0.00171	EPA 3005A	3,200.8
9	October 6, 2022	<0.00171	0.00171	EPA 3005A	3,200.8
10	November 3, 2022	0.00142	0.00034	EPA 3005A	3,201.8
	Average	<0.00215			
	Max	0.00475			

20. Finch submitted Quarterly Visual Monitoring Reports for 2023 for MSGP outfalls 003 and 004. The Forms are labelled with the Permit NYR00F082, however Finch's MSGP Permit ID No. is NYR00F582.



NEW YORK STATE Department of Environmental Conservation

Quarterly Visual Monitoring Form Multi-Sector GP-0-23-001

All facilities covered under the MSGP must perform Quarterly Visual Monitoring. This form is part of the facilities records and should be retained onsite with the facility's Stormwater Pollution Prevention Plan. Please see the permit Part IV.E for additional requirements. *Keep this form with the Facility's SWPPP. Please do not submit this form to the Department.*

This QVM form is being used as a follow up to Corrective Actions being implemented due to the previous QVM indicating the presence of stormwater pollution.

☒ This QVM form is for a regular quarterly event

SPDES ID Number: **NYR00 F082** Facility Name: **Finch Paper LLC** Reporting Year: **2023**

Examiner's Name: **Bob Hudak** ☒ January 1 - March 31
April 1 - June 30
July 1 - September 30
October 1 - December 31

Examiner's Title: **Environmental Engineer**

Is this for a Qualifying Storm of greater than 0.1 inches? ☒ Yes

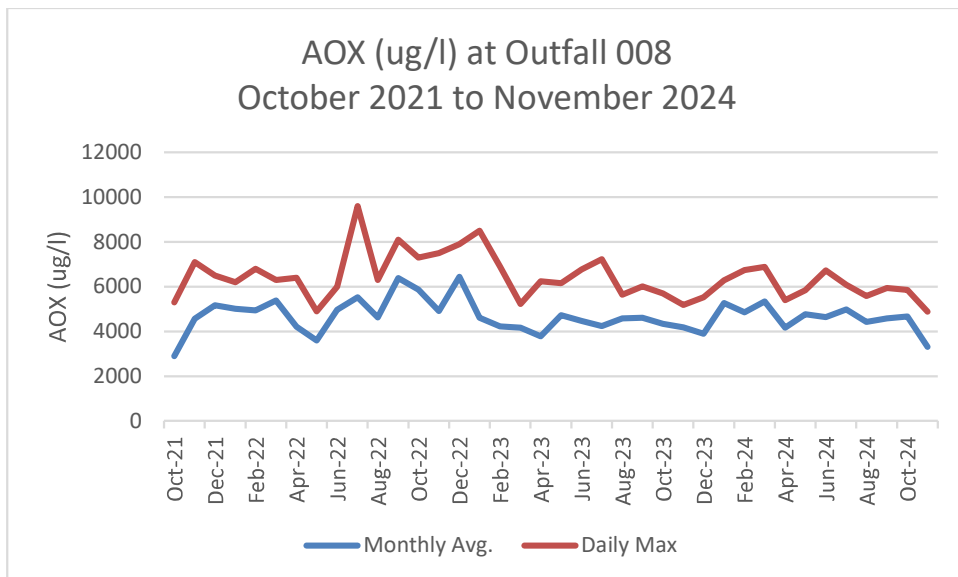
Outfall Number: **004** Date/Time Collected and Examined: **2/9/23 11:00 AM** Rainfall Amount: **0.30** Runoff Source? ☒ Rainfall ☒ Snowmelt

1. Does the stormwater appear to be colored? ☐ Yes ☐ No

C. Other inspection findings

1. Records Review

- a. The Facility is conducting daily Adsorbable Organic Halides ("AOX") monitoring as required by the Permit and 40 CFR §430, Subpart E. There are currently no effluent limits or action levels associated with AOX contained in the Permit. The Facility was interested in reducing its monitoring frequency for AOX to reduce costs. 40 CFR §430.02, Monitoring Requirements, contains procedures for obtaining reduction in monitoring frequencies for parameters required by 40 CFR§430. The figure below shows AOX monthly average and daily maximum data for the period October 2021 to November 2024.



- b. The Annual Priority Pollutant Scan, for 2023, was conducted in October 2023, and included results for Volatile Organics (EPA Method 624.1), Semi Volatiles (EPA Method 625.1), PCBs and Pesticides (EPA Method 608.3 with cleanup method EPA 3665A and 3660 B), which are considered valid cleanup methods under EPA method 608.3. Review of the Priority Pollutant lab report custody seal was noted as “absent” in the lab report. Tables below lists pollutants that were detected, the rest were listed as non-detect:

Volatile Organics by GC/MS	Result	Units
Acetone	26	ug/l
Carbon disulfide	0.72	ug/l

Total metals	Result	Units
Chromium, Total	0.0024 j	mg/l
Copper, Total	0.0026 j	mg/l
Zinc, Total	0.0071	mg/l

- The Special Conditions, No. 8, requires inspection of its thermal diffusers (Outfall 008) annually. Review of the 2023 report from the diver inspection on 10/3/23, indicated that the six (6) stainless steel diffuser pipes were flowing with no obstructions. The report indicated that the pipe was encased in concrete, but there were places where the pipe was visible and no longer encased, but the report stated that the pipe was not showing signs of wear or disrepair.
- Finch provided a Mercury Minimization Plan dated 2023, which included the conditional exclusion certification specified in the MMP Section of the Permit paragraph 2, that the Facility is neither a Mercury Source nor does it receive flows from a mercury source.
- Special Condition – Section B, Biological Monitoring Requirements (“BMR”) of the Permit requires submittal of a Verification Monitoring Report. Finch submitted this report dated January 17, 2024, and received approval from NYSDEC Energy Unit on April 12, 2024, provided that Finch complies with the BMR requirements in 2.a and b (Continuous Operation of Existing Screens) of the Permit.

5. As shown in photo 129 (Att. 1), the Facility has continuous monitoring for ammonia, pH, temperature on its aerated basin which is used for process control.
6. The surface mixers on the aerated basins were operating. The dissolved oxygen meters on the aeration basin effluent measured 1.21 mg/L from the west basin and 0.98 mg/L on the east basin.
7. Defoamer was being added to Clarifier No. 2
8. The vehicle maintenance area was said not to have floor drains.
9. Continuous conductivity, pH, and flow are measured at the wastewater treatment plant influent for process control and to detect spills. TKN, Nitrate, BOD, TSS, and AOX are sampled daily.
10. There is an Emergency Generator for No. 1 lift station. The WWTP does not have an emergency generator associated with it. The representatives said that they would shut down the plant in the event of a power failure.
11. Following the inspection, Finch submitted many Permit required documents, that were requested by EPA, including the following:
 - a. Ten (10) 2022 Finch Paper LLC Short Term High Intensity Lead Monitoring Reports
 - b. 2023 MSGP Annual Certification Report
 - c. 2023 Priority Pollutant Scan
 - d. 2023 Quarterly Visual Monitoring MSGP
 - e. 2023 10-03 Finch Paper Outfall 008 Diffuser Inspection
 - f. 2023 – July and August Effluent Temperature Calculations
 - g. DMRQA Results for Total Chlorine
 - h. Finch Paper LLC Mercury Minimization Plan
 - i. Outfall 008 pH Calibrations
 - j. Outfall 012 Flow Meter Calibration
 - k. Two (2) 2023 Metals Alpha Analytical reports
 - l. Five (5) 2023 Inorganics Alpha Analytical reports
 - m. Temperature Calibrations
 - n. 2024-04-12 Verification Monitoring Report
 - o. SWPPP
 - p. Finch Outfall Map
 - q. 2019-01-01 Finch Paper SPDES BMP
 - r. Finch Paper LLC Spent Pulping Liquor BMP
 - s. 2023-11-03 Daily Max TSS BOD Violation Outfall 012 Temp Documentation
 - t. 2023-11-06 Ammonium Bisulfite to River Documentation
 - u. 2023-11-08 Daily Max TSS BOD Violation Documentation
 - v. 2023-10-03 Priority Pollutant Report

- w. November 2023 - Finch Paper LLC DMR
- x. November 2023 - Finch Paper LLC DMR Spreadsheet
- y. December 2023 - Finch Paper LLC DMR Spreadsheet
- z. Twenty-five (25) BOD TSS reports
- aa. Two (2) AOX lab reports
- bb. Ten (10) Chloroform lab reports
- cc. 2023-10-14 Chlorinated Phenolics report
- dd. 2023-10-11 Dioxin Furan report
- ee. Image of storm drain cleanout post CEI inspection
- ff. 2023 Finch Paper Stormwater Outfall 014 TSS Analysis
- gg. Finch Diffuser Inspection

ATTACHMENTS

Attachment 1 - Photograph Log by EPA Region 2

Attachment 1.a – Photograph Locations

Attachment 2 - Spill report from November 6, 2023, power house sewer spill.

Attachment 3 - Storm drain cleanout using Vactor following the inspection