

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	03/14/2025		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	International Paper Co		
Facility Name:	Mansfield Mill		
Facility Physical Location:	1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
(city, state, zip code)	Mansfield, LA 71052		
Mailing address:	1202 Hwy 509		
(city, state, zip code)	Mansfield, LA 71052		
County/Parish:	DeSoto Parish		
Facility Contact:	Ms. Allie Cozad	Environmental Manager	
	(C) 318.228.9085 and allie.cozad@ipaper.com		
FRS Number:	110000450173		
Identification/Permit Number:	LA0056651 (AI No. 328)		
Media Number:	N/A		
NAICS:	32213		
SIC:	2611		
Personnel participating in inspection:			
Jack Arias	EPA Region-6 ECD-WA	Inspector	214-665-8164
Nick Kiser	DEQ Louisiana	Inspector	318-676-5291
John Pearce	DEQ Louisiana	Inspector	
Allie Cozad	International Paper Co	Environmental Manager	318-228-9085
EPA Lead Inspector Signature/Date	JACK ARIAS		Digitally signed by JACK ARIAS Date: 2025.05.08 08:29:46 -05'00'
	{Jack Arias}		Date
Supervisor Signature/Date	ANTHONY LOSTON		Digitally signed by ANTHONY LOSTON Date: 2025.05.08 08:52:47 -05'00'
	{Anthony Loston}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Jack Arias and DEQ Louisiana inspectors, Nick Kiser and John Pearce performed an announced inspection at International Paper Co - Mansfield Mill on March 14, 2025, beginning at 9:00 AM. We met with the Plant Environmental Manager, Ms. Allie Cozad at the opening conference. We presented our credentials to the facility representative, Ms. Cozad, and informed her that this was an announced EPA and DEQ Louisiana inspection to determine the facility's compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) water intakes and discharge regulations. The scope of the inspection included a compliance evaluation of the NPDES permit (LA0056651) that includes DMR data and effluent limitations, 316b cooling water intake structures integrity, 316b intake and discharge processes, monitoring/sampling requirements, equipment/pipes maintenance, 316b biomonitoring requirements connected with best management practices and best technology available to minimize impingement mortality and entrainment of aquatic organisms, review of the stormwater pollution prevention plan (SWPP3) and Spill Prevention Control and Countermeasures (SPCC) plan, record keeping requirements, and facility procedures connected to the permit. Following the opening conference, Ms. Cozad and other facility members accompanied us for the entirety of the inspection and gave us a tour of the site in a company vehicle. The closing conference was held with Ms. Cozad where we informed her of the results and observations of the inspection.

FACILITY DESCRIPTION

The Mansfield Mill is in northwestern Louisiana approximately 13 miles northeast of Mansfield, in DeSoto Parish. The mill has been in operation for over 25 years manufacturing pulp and paper products. The mill produces its own steam and electricity. Most of the water used at the mill is obtained from Toledo Bend Reservoir. Process wastewater from the mill is collected and treated in a permitted wastewater treatment system that utilizes overland flow and constructed wetlands treatment processes. Wastewater generated by processes at the Mansfield Mill are treated and discharged to the Red River, or natural tributaries that drain to the Red River, through five external outfalls (001, 002, 003, 005, & 006), and two internal outfalls (101 & 201). In addition, the current permit authorizes the infrequent discharge of raw water intake backflow through external Outfall 004 to the Toledo Bend Reservoir, the intake water supply source. The wastewater collection system consists of a complex collection system of trenches, sewers, and hard piping. The wastewater treatment system consists of an effluent lift pit system, an emergency effluent basin, a surge basin, and an overland wetlands secondary treatment system. The surge basin system received and treated various process wastewater streams from the mill procedures. The effluent lift pit system uses pumps to lift wastewater (effluent) to ensure the wastewater can continue to flow towards treatment. The emergency effluent basin is a pond that hold wastewater. In the overland system, the wastewater is sprayed onto the ground and biodegradation takes place in the soil. In the wetlands system, the wastewater is pumped to the wetlands area and allowed to flow over the ground and for biodegradation to take place in the soil. The wastewater is then sent to a retention pond before being pumped to the Red River through Outfall 001 (See Photo Nos. 1 - 19 in Appendix 1).

Section II – OBSERVATIONS

Clean Water Act 316b Cooling Water Intake Structures (CWIS):

The Mansfield Mill operates a cooling water intake structure (CWIS) and a closed cycle cooling water system. The Mansfield Mill withdraws water from Toledo Bend Reservoir through a CWIS located approximately 7 miles south of the facility and uses at least 23 percent of the water they withdraw exclusively for cooling purposes. The design intake flow of the system is 18.8 MGD and the actual intake flow is 17.1 MGD. The system includes four pumps with trash racks. The bottoms of the trash racks are approximately 25 to 30 feet below the reservoir surface water level. Section 316(b) of the Clean Water Act requires that cooling water intake structures (CWIS) reflect the best technology available (BTA) for minimizing environmental impacts due to the impingement of fish and shellfish on intake structures and the entrainment of eggs and larvae through cooling water systems. At the time of the inspection, Ms. Allie Cozad informed the inspectors that CWIS repairs (found in inspection on 08/21-22/2024) were not achieved (current 2025 inspection) and will be performed in 2026 as part of the maintenance process at the facility. Facility will shut off operations temporarily to allow facility's crew to safely perform maintenance and upgrades to facility's infrastructure. We confirmed deficiencies on the integrity of the CWIS such as 1) debris inside the stainless-steel trash rack box; 2) corrosion and a large hole on the stainless-steel trash rack wall structures that contain and protect the intake pipes connected to the pumps; and 3) a lack of records regarding the screened caisson structure designed to prevent large organisms or debris from entering the system and reduce impingement of small organisms or further restrict smaller debris (See Photo No. 2 in Appendix 1).

Raw Water Supply and Clarifiers System:

Make-up water for use at the Mansfield Mill is obtained from Toledo Bend Reservoir and from several groundwater production wells. Intake water from Toledo Bend Reservoir is treated in two clarifiers (south and north clarifiers) prior to being routed to the treated water reservoir for use in utilities and mill process units. Groundwater from several production wells is routed directly to the Treated Water Reservoir. At the time of the inspection, we observed that because of the prior 2023 inspection, the facility removed plants and algae layers inside the south and north clarifier systems (See Photo Nos. 3 – 5 in Appendix 1).

Treated Water Reservoir:

The Treated Water Reservoir receives water from Toledo Bend Reservoir. The water is treated through two clarifiers (south and north clarifiers) systems and discharge into the Treated Water Reservoir for use in utilities and mill process units. Its main purpose is to provide capacity water to maintain facility operations for specific periods of time. We observed that because of prior 2023 inspection, the facility fixed the water overflow from the reservoir into a ditch system next to the reservoir leading to Outfall 003 (See Photo No. 5 in Appendix 1).

Mill Process and Wastewater Flow/Treatment:

Treated water from the treated water reservoir is used in utilities and mill process units. The various process wastewater streams from the mill processes are collected and drained via a complex system of trenches, sewers, and hard piping. The wastewater treatment system consists of an effluent lift pit, an

emergency basin, a surge basin, overland flow, and wetlands treatment areas. It was observed that the surge basin system was observed as the most impactful regarding consequences of failure of the wastewater treatment system. This surge basin system receives and treats various process wastewater streams from the mill procedures. In the overland flow treatment system, the wastewater is sprayed onto terraced fields where biodegradation takes place in the soil. In the Wetlands Treatment System, the wastewater is pumped to the wetlands area and allowed to flow across the wetlands area for treatment. The wastewater from the overland flow and wetland treatment areas is then drained by gravity flow to a retention pond before being pumped to the Red River via Outfall 001. At the time of the inspection, we observed a wastewater leak from the pipe system next to effluent lift pit tank. Also, we observed sludge material on the floor and walls and wastewater runoff coming from the storing containers next to effluent lift pit tank (See Appendix 1 – Photo Log from inspection on 08/21-22/2024 and Photo Nos. 6 – 11 in Appendix 1).

Storm Water System:

The storm water system is designed to collect and manage rainwater runoff from the facility and surrounding areas. At the time of the inspection, we observed solid waste and sludge material getting into the storm water system near the effluent lift pit tank (See Photo Nos. 12-14 in Appendix 1).

Emergency Surge Basin, Overland flow treatment system, and Outfall 001:

The Emergency Surge Basin is a pond that holds wastewater. In the overland system, the wastewater is sprayed onto the ground and biodegradation takes place in the soil. Outfall 001 comprise continuous discharge of treated combined process wastewater, process area storm water runoff, landfill leachate, utility wastewater, miscellaneous wastewater, non-process area storm water runoff, and monitored treated sanitary wastewater from internal outfalls 101 and 201. Outfall 001 discharges to Red River. There was flow and discharge at the time of the inspection. We observed foam material coming from the internal Overland Flow Treatment System and foam material built-up at the Emergency Surge Basin. Both systems are connected to the Retention Pond before being pumped to the Red River via Outfall 001. Also, we observed foam material coming out from outfall 001 at Red River. The discharge flow at Red River is about 9,000 gallons per minute (See Photo Nos. 15 - 19 in Appendix 1).

Section III – AREAS OF CONCERN

The following Areas of Concern were observed during the Inspection and follow-up conversations discussed with the facility:

1. There are visible deficiencies of the cooling water intake structure (CWIS) at Toledo Bend Reservoir. **Part II Subpart P** (Page 24 of 24) of the of the NPDES permit “The cooling water system must be operated and maintained as represented in the application 316b application”, **Part 125.94 Subpart d** of the Clean Water Act “require periodic reporting on your progress towards installation and operation of site-specific entrainment controls. These reports may include updates on planning, design, and construction or other appropriate topics as required by the Director” and **Section B.3.** (page 78 of 93) of the of the NPDES permit “The permittee shall at all the times properly operate and maintained all facilities and systems of treatment and control

which are installed or used by the Permittee to achieve compliance with the conditions of this permit”

2. There is visible foam material coming out from outfall 001 at Red River. The discharge flow at Red River is approximately 9,000 gallons per minute. **RLP 1. Outfall 001. N-3 LAC 33: IX.1113.B** (page 32 of 93) of the NPDES permit “There shall be no discharge of floating or settleable solids or visible foam in other than trace amounts, nor of free oily materials, nor of toxic materials in quantities such as to cause toxicity to aquatic organisms”
3. There is a wastewater leak from the pipe system next to effluent lift pit tank. Also, we observed sludge material on the floor and walls and wastewater runoff coming from the storing containers next to effluent lift pit tank. **Section B.3.** (page 78 of 93) of the of the NPDES permit “The permittee shall at all the times properly operate and maintained all facilities and systems of treatment and control which are installed or used by the Permittee to achieve compliance with the conditions of this permit”
4. There is solid waste and sludge material getting into the storm water system near the effluent lift pit tank. **Section B.3.** (page 78 of 93) of the of the NPDES permit “The permittee shall at all the times properly operate and maintained all facilities and systems of treatment and control which are installed or used by the Permittee to achieve compliance with the conditions of this permit”

There were no other areas of concern at the time of the inspection and EPA Region 6 and DEQ Louisiana inspectors conducted a closing conference with the facility at approximately 4:50 PM on March 14, 2025. During the closing conference, inspectors reviewed findings with the Plant Environmental Manager Ms. Allie Cozad.

Section IV – FOLLOW UP

 EPA will provide a copy of the inspection report and hold follow-up meetings relevant to discuss inspection report results, observations, and potential corrective actions.

 Facility will provide and discuss information connected with the areas of concern.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – one photo taken 08/22/2024, one photo taken 03/12/2025, and 17 photos taken 03/14/2025.

Appendix 1

Photograph Log and

Significant Photo Locations



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P8220160.JPG
Date of Photograph: 08/22/2024
Latitude and Longitud: 32.1567100 -93.5599159
Orientation: N
Map Datum: WGS-84
Time of Photo: 04:34 PM
Photographer: Jack Arias
Description: This image shows the entrance and the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)

Mansfield

County: DeSoto Parish

State: Louisiana



Photograph File Name: P3120136.JPG

Date of Photograph: 03/12/2025

Latitude and Longitude: 31.892353 -93.897206

Orientation: SW

Map Datum: WGS-84

Time of Photo: 1:20 PM

Photographer: Jack Arias

Description: This image shows the Water Intake Structure that intake fresh water from Toledo Bend Reservoir for the cooling and industrial processes at the facility. The design intake flow of the system is 18.8 MGD and the actual intake flow is 17.1 MGD.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140281.JPG
Date of Photograph: 03/14/2025
Latitude and Longitud: 32.1592963 -93.5568618
Orientation: SE
Map Datum: WGS-84
Time of Photo: 1:31 AM
Photographer: Jack Arias
Description: This image shows the south clarifier system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P83140275.JPG
Date of Photograph: 03/14/2025
Latitude and Longitud: 32.161268 -93.555912
Orientation: NE
Map Datum: WGS-84
Time of Photo: 1:21 PM
Photographer: Jack Arias
Description: This image shows the north clarifier system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P83140274.JPG
Date of Photograph: 03/14/2025
Latitude and Longitude: 32.161268 -93.555912
Orientation: NE
Map Datum: WGS-84
Time of Photo: 1:21 PM
Photographer: Jack Arias
Description: This image shows the treated water reservoir.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140254.JPG
Date of Photograph: 3/14/2025
Latitude and Longitud: 32.16083333 -93.55944444
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:03 PM
Photographer: Jack Arias
Description: This image shows an active effluent lift clarifier system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P140255.JPG
Date of Photograph: 3/14/2025
Latitude and Longitude: 32.161411, -93.559906
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:03 PM
Photographer: Jack Arias
Description:

This image shows a tank that is part of the lift pit system. The tank received and collected wastewater from the lift pit system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140263.JPG
Date of Photograph: 3/14/2025
Latitude and Longitud: 32.161422, -93.559796
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:07 PM
Photographer: Jack Arias
Description: This image shows a wastewater leak from pipes next to the lift pit system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140262.JPG
Date of Photograph: 3/14/2025
Latitude and Longitude: 32.161422, -93.559796
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:06 PM
Photographer: Jack Arias
Description: This image shows a wastewater pool next to the lift pit system because of pipe leaks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140270.JPG
Date of Photograph: 3/14/2025
Latitude and Longitud: 32.161411, -93.559906
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:12 PM
Photographer: Jack Arias
Description: This image shows sludge material outside of storing container (floor and wall of clarifier) next to effluent lift pit tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140272.JPG
Date of Photograph: 3/14/2025
Latitude and Longitude: 32.161411, -93.559906
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:12 PM
Photographer: Jack Arias
Description: This image shows wastewater runoff coming from the storing containers next to effluent lift pit tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140265.JPG
Date of Photograph: 3/14/2025
Latitude and Longitude: 32.161431, -93.559716
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:07 PM
Photographer: Jack Arias
Description: This image shows solid waste and sludge material getting into the storm water system near the effluent lift pit tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140267.JPG
Date of Photograph: 3/14/2025
Latitude and Longitud: 32.161453, -93.559652
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:08 PM
Photographer: Jack Arias
Description: This image shows solid waste and sludge material getting into the storm water system near the effluent lift pit tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140268.JPG
Date of Photograph: 3/14/2025
Latitude and Longitude: 32.161421, -93.559809
Orientation: NW
Map Datum: WGS-84
Time of Photo: 1:09 PM
Photographer: Jack Arias
Description: This image shows solid waste and sludge material getting into the storm water system near the effluent lift pit tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140284.JPG
Date of Photograph: 3/14/2025
Latitude and Longitude: 32.156624, -93.544696
Orientation: SE
Map Datum: WGS-84
Time of Photo: 1:41 PM
Photographer: Jack Arias
Description:

This image shows visible foam material coming from the overland flow treatment system. This is connected to the retention pond before being pumped to the Red River via Outfall 001.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140287.JPG
Date of Photograph: 3/14/2025
Latitude and Longitud: 32.157389 -93.545834
Orientation: SE
Map Datum: WGS-84
Time of Photo: 1:46 PM
Photographer: Jack Arias
Description:

This image shows visible foam material built-up at the emergency surge basin that is connected to the retention pond before being pumped to the Red River via Outfall 001.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3140295.JPG

Date of Photograph: 03/14/2025

Latitude and Longitude: 32.146786, -93.537121

Orientation: SE

Map Datum: WGS-84

Time of Photo: 1:53 PM

Photographer: Jack Arias

Description: This image shows visible foam formations at the retention pond before being pumped to the Red River via Outfall 001.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3130211.JPG
Date of Photograph: 03/14/2025
Latitude and Longitud: 32.123855 -93.461912
Orientation: E
Map Datum: WGS-84
Time of Photo: 12:00 PM
Photographer: Jack Arias
Description: This image shows visible foam material coming out from outfall 001 at Red River.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

1202 Hwy 509 Mansfield, LA 71052 (32.1567100 -93.5599159)		
Mansfield	County: DeSoto Parish	State: Louisiana



Photograph File Name: P3130218.JPG
Date of Photograph: 03/14/2025
Latitude and Longitude: 32.123855 -93.461912
Orientation: E
Map Datum: WGS-84
Time of Photo: 12:00 PM
Photographer: Jack Arias
Description: This image shows visible foam material coming out from outfall 001 at Red River.