

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

Inspection Date(s):	08/21-22/2024		
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 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
Allie Cozad	International Paper Co	Environmental Manager	318-228-9085
EPA Lead Inspector Signature/Date	JACK ARIAS Digitally signed by JACK ARIAS Date: 2024.10.16 11:11:47 -05'00' {Jack Arias}		Date
Supervisor Signature/Date	ANTHONY LOSTON Digitally signed by ANTHONY LOSTON Date: 2024.10.17 11:38:59 -05'00' {Anthony Loston}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Jack Arias and DEQ Louisiana inspector, Nick Kiser performed an announced inspection on August 21, 2024, at 9:00 AM. We (Jack Arias and Nick Kiser) 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 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 organism, review of 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 and wetlands. Wastewaters generated by processes at the Mansfield Mill are discharge 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 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, 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. 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 - 30 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 (See Photo Nos. 2 – 3 in Appendix 1). 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, we observed potential deficiencies on the integrity of the CWIS. We observed debris inside the stainless-steel trash rack box, corrosion and a large hole on the stainless-steel trash rack wall structures that contain and protect the intake pipes connected to the pumps. Also, we could not observe a screened caisson structure designed to prevent large organisms or debris from entering the system and a smaller mesh screened structure inside of it to reduce impingement of small organisms or further restrict smaller debris (See Photo Nos. 4 – 6 in Appendix 1).

Head Tank:

The head tank is part of the water intake structure system (CWIS). Its purpose is to store water and provide capacity to maintain facility operations for specific periods of time. Intake water is stored at this location and transferred to the mill. The tank is connected to nine pumps prior to the mill (four intake pumps at Toledo Bend Reservoir, two push pumps between Toledo and Head Tank, and three push pumps between head tank and the mill). At the time of the inspection, we observed intake water overflowing from the tank to ground surface next to the tank (See Photo Nos. 7 – 8 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 plants and algae layers inside the south and north clarifier systems. These plants and algae layers could potentially impact the treatment process and integrity of the clarifier systems (See Photo Nos. 9 – 11 in Appendix 1).

Treated water reservoir:

The treated water reservoir received 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. At the time of the inspection, we observed the presence of fish and small formation of algae. Also, we observed large amounts of treated water overflowing (north right corner of

reservoir) from the reservoir directly into a ditch system next to the reservoir area leading to Outfall 003 (See Photo Nos. 12 – 20 in Appendix 1).

Mill Process and Wastewater Flow/Treatment:

Treated water from the 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. The surge basin system is the greatest part 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 did not observe any deficiencies on the water use and treatment processes (See Photo Nos. 25 – 27 in Appendix 1).

Cooling Tower:

The Cooling Water Systems operates several cooling tower systems. They are evaporative cooling designs, fan-induced upward draft with water falling over high surface area poly/fiberglass fill. The water is cooled in tower and circulated to the surface condensers, inter coolers, and after coolers on evaporator trains and concentrators. Water is then returned to the cooling tower. The water is recirculated to the treated water reservoir for water conservation. Water make-up is added, as needed, to account for blowdown and evaporation. At the time of the inspection, we did not observe any deficiencies on the recirculating system. However, we observed that part of the wastewater from mill processes is redirected and recirculated to the treated water reservoir (See Photo Nos. 12 – 13 in Appendix 1).

Internal Outfalls 101 and 201:

These outfalls include a continuous discharge of treated sanitary wastewater. Both outfalls 101 and 201 discharge into the lift Pit and are directed to the wastewater treatment system, and thence to outfalls 001 (Red River) and 002 (Bayou Pierre). At the time of the inspection, we did not observe any deficiencies on the discharge or treatment process. However, we observed that both outfalls did not have the proper label or identification tags. Also, we observed that outfall 201 was under maintenance and stopped operation (See Photo Nos. 22-24 in Appendix 1).

Outfall 001:

This outfall includes 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 and the water had a dark brown tint (See Photo No. 29 in Appendix 1).

Outfall 002:

This outfall receives and includes an intermittent overflow of treated combined process wastewater, process area storm water runoff, landfill leachate, utility wastewater, miscellaneous wastewater, non-process area stormwater runoff, and monitored treated sanitary wastewater from internal outfalls 101 and 201. Outfall 002 discharges into Bayou Pierre. There was no flow and discharge at the time of the inspection (See Photo No. 28 in Appendix 1).

Outfall 003:

This outfall includes intermittent discharge of low contamination potential stormwater runoff and treated water reservoir overflow. Outfall 003 discharges into Bayou Pierre. At the time of the inspection, we observed large amounts of treated water overflowing and discharging (north right corner of reservoir) from the reservoir into a ditch system next to the reservoir area and directed to Outfall 003. Also, we did not observe the proper label or identification tag. There was flow and discharge into Bayou Pierre (See Photo Nos. 15 - 21 in Appendix 1).

Outfall 005 and 006:

These outfalls 005 and 006 includes intermittent discharge of low contamination potential stormwater runoff from the northern (005) and southern (006) sections of the solid waste disposal facility (low contamination potential stormwater runoff from rail yard and rail tracks in the case of outfall 006). At the time of the inspection, we observed that both outfalls did not have an identification tag (See Photo No. 30 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. Facility should provide the 316b application file that includes information about the integrity and maintenance of the cooling water intake structure (CWIS). This file should include intake structure dimensions, maintenance records in case of corrosion (stainless-steel trash rack wall structures) and others, drawings and maintenance records of screened caisson structure that prevent large organism or debris from entering the system, drawings and maintenance records of smaller mesh screened structure that reduce impingement of small organism or further restrict smaller debris manual backflush.
2. Facility needs to provide information about a permit that allows them to release water from the head tank into the surface area next to the tank. Also, the facility needs to explain how they will control the volume and flow rate of water going to the head tank and discharge into the surface.
3. Facility needs to control the plants and algae growth inside the south and north clarifier systems and further explain how the plants and algae potentially impact the treatment process and integrity of the clarifier systems.
4. Facility needs to provide information about the chemical composition of the treated water at the reservoir, wastewater from mill processes redirected and recirculated to the treated water reservoir, and cooling water redirected to the reservoir. This will help to determine the potential

impacts of treated water that was overflowing (north right corner of reservoir) from the reservoir directly into a ditch system next to the reservoir and directed to Outfall 003.

5. Facility needs to provide an explanation of the treated water overflowing and discharging from the reservoir into a ditch system, thence to Outfall 003.
6. Facility needs to provide an updated wastewater flow balance diagram and photos of missing labels or identification tags for external and internal outfalls.
7. Also, facility needs to provide information about the inactivity and potential activation of outfall 201 (under maintenance).
8. Facility needs to provide copies of updated SWPP3 and SPCC plans.

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 – 30 photos taken 08/21-22/2024.

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: P8220143.JPG
Date of Photograph: 08/22/2024
Latitude and Longitude: 31.892353 -93.897206
Orientation: SW
Map Datum: WGS-84
Time of Photo: 10:00 AM
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: P8220133.JPG
Date of Photograph: 08/22/2024
Latitude and Longitud: 31.892353 -93.897206
Orientation: SW
Map Datum: WGS-84
Time of Photo: 9:39 AM
Photographer: Jack Arias
Description:

This image shows four pumps with trash racks that are used to intake fresh water from Toledo Bend Reservoir. The bottoms of the trash racks are approximately 25 to 30 feet below the reservoir surface water level.



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: P8220132.JPG
Date of Photograph: 08/22/2024
Latitude and Longitude: 31.892353 -93.897206
Orientation: SW
Map Datum: WGS-84
Time of Photo: 9:39 AM
Photographer: Jack Arias
Description: This image shows debris inside the stainless-steel trash rack box.



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: P220137.JPG
Date of Photograph: 08/22/2024
Latitude and Longitud: 31.892353 -93.897206
Orientation: SW
Map Datum: WGS-84
Time of Photo: 9:42 AM
Photographer: Jack Arias
Description:

This image shows corrosion on the stainless-steel trash rack wall structures that contain and protect the intake pipes connected to the pumps.



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: P8220147.JPG
Date of Photograph: 08/22/2024
Latitude and Longitude: 31.892353 -93.897206
Orientation: SW
Map Datum: WGS-84
Time of Photo: 10:02 AM
Photographer: Jack Arias
Description:

This image shows a large hole (red arrow) on the stainless-steel trash rack wall structures that contain and protect the intake pipes connected to the pumps.



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: P8220152.JPG
Date of Photograph: 08/22/2024
Latitude and Longitud: 32.023692 -93.759556
Orientation: SW
Map Datum: WGS-84
Time of Photo: 10:47 AM
Photographer: Jack Arias
Description:

This image shows the head tank which is part of the water intake structure system (CWIS). Its purpose is to store water and provide capacity water to maintain facility operations for specific period of times.



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: P8220150.JPG

Date of Photograph: 08/22/2024

Latitude and Longitude: 32.023692 -93.759556

Orientation: SW

Map Datum: WGS-84

Time of Photo: 10:47 AM

Photographer: Jack Arias

Description: This image shows the intake water overflowing from the tank to ground surface next to the tank.



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: P8210061.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.1592963 -93.5568618
Orientation: E
Map Datum: WGS-84
Time of Photo: 11:29 PM
Photographer: Jack Arias
Description: This image shows the south clarifier that received and treated water from the intake water from Toledo Bend Reservoir prior to being routed to the treated water reservoir for use in utilities and mill process units.



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: P8210065.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.1592963 -93.5568618
Orientation: E
Map Datum: WGS-84
Time of Photo: 11:39 AM
Photographer: Jack Arias
Description: This image shows plants and algae beds inside the south clarifier system. These plants and algae layers could potentially impact the treatment process and integrity of the clarifier system.



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: P8210075.JPG
Date of Photograph: 08/21/2024
Latitude and Longitud: 32.161268 -93.555912
Orientation: NE
Map Datum: WGS-84
Time of Photo: 12:02 PM
Photographer: Jack Arias
Description:

This image shows plants and algae beds inside the north clarifier system. These plants and algae beds could potentially impact the treatment process and integrity of the clarifier system.



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: P8210060.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.691122 -92.017733

Orientation: E

Map Datum: WGS-84

Time of Photo: 11:29 AM

Photographer: Jack Arias

Description: This image shows the Cooling Water Systems. Cooling water is recirculated to the treated water reservoir for water conservation.



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: P8210060.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.159548 -93.555954°

Orientation: E

Map Datum: WGS-84

Time of Photo: 11:29 AM

Photographer: Jack Arias

Description: This image shows the Cooling Water Systems. Cooling water is recirculated to the treated water reservoir for water conservation.



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: P8210059.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.159595 -93.556836

Orientation: N

Map Datum: WGS-84

Time of Photo: 11:30 AM

Photographer: Jack Arias

Description: This image shows the treated water reservoir received water from Toledo Bend Reservoir. Its main purpose is to provide capacity water to maintain facility operations for specific period of times.



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: P8210082.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.160844 -93.555648
Orientation: NE
Map Datum: WGS-84
Time of Photo: 12:09 PM
Photographer: Jack Arias
Description:

This image shows large amounts of treated water overflowing (north right corner of reservoir) from the reservoir directly into a ditch system next to the reservoir area leading to Outfall 003.



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: P8210083.JPG

Date of Photograph: 08/21/2024

Latitude and Longitud: 32.161234 -93.555356

Orientation: NE

Map Datum: WGS-84

Time of Photo: 12:09 AM

Photographer: Jack Arias

Description: This image shows the ditch system next to the reservoir area directing treated water to Outfall 003.



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: P8210091.JPG
Date of Photograph: 08/21/2024
Latitude and Longitud: 32.161234 -93.555356
Orientation: NE
Map Datum: WGS-84
Time of Photo: 12:20 PM
Photographer: Jack Arias
Description: This image shows the ditch system next to the reservoir area directing treated water to Outfall 003.



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: P8210086.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.161994 -93.555272

Orientation: NE

Map Datum: WGS-84

Time of Photo: 12:11 PM

Photographer: Jack Arias

Description: This image shows the ditch system (red arrows) next to the reservoir area directing treated water to Outfall 003.



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: P8210105.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.159113 -93.551988

Orientation: NE

Map Datum: WGS-84

Time of Photo: 1:01 PM

Photographer: Jack Arias

Description: This image shows the ditch system next to the reservoir area directing treated water to Outfall 003.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

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



Photograph File Name: P8210110.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.156566 -93.551936

Orientation: NE

Map Datum: WGS-84

Time of Photo: 1:10 PM

Photographer: Jack Arias

Description: This image shows the ditch system and Outfall 003. We did not observe the proper label or identification tag.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

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



Photograph File Name: P8210111.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.156279 -93.552007
Orientation: NE
Map Datum: WGS-84
Time of Photo: 1:10 PM
Photographer: Jack Arias
Description: This image shows a downstream flow and discharge from Outfall 003.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

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



Photograph File Name: P8210052.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: -93.554518,

Orientation: SE

Map Datum: WGS-84

Time of Photo: 11:00 AM

Photographer: Jack Arias

Description: This image shows internal outfall 101 that discharge into lift Pit and is directed to the wastewater treatment system, and thence to outfalls 001 (Red River) and 002 (Bayou Pierre). We did not observe the proper label or identification tag.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

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



Photograph File Name: P8210099.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.161069 -93.559656
Orientation: NW
Map Datum: WGS-84
Time of Photo: 11:00 AM
Photographer: Jack Arias
Description:

This image shows internal outfall 201 that discharge into lift Pit and is directed to the wastewater treatment system, and thence to outfalls 001 (Red River) and 002 (Bayou Pierre). We did not observe the proper label or identification tag.

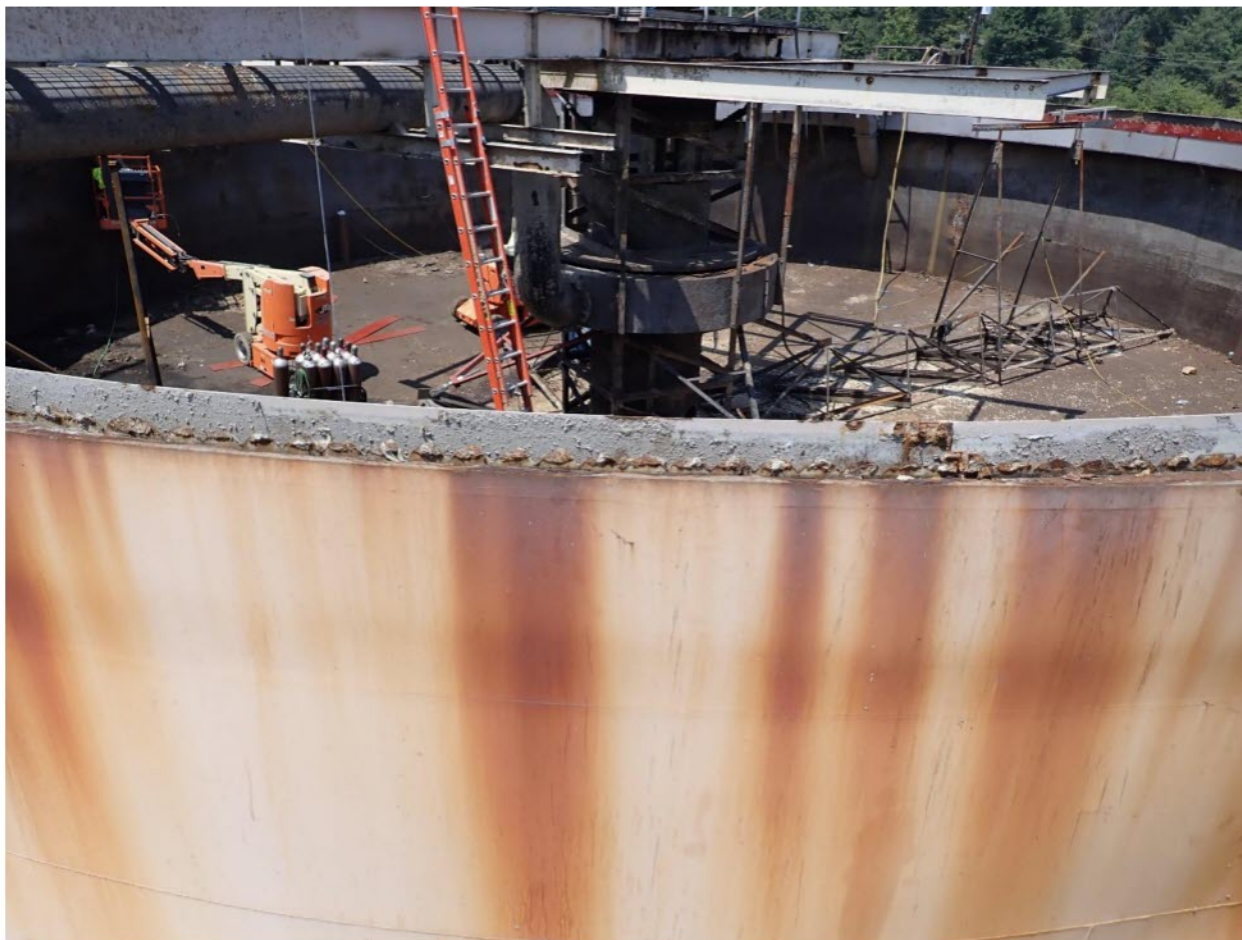


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

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



Photograph File Name: P8210100.JPG

Date of Photograph: 08/21/2024

Latitude and Longitude: 32.161069 -93.559656

Orientation: NW

Map Datum: WGS-84

Time of Photo: 12:41 AM

Photographer: Jack Arias

Description: This image shows a tank under maintenance. This tank is connected to internal outfall 201.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

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



Photograph File Name: P8210055.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.156380 -93.554439
Orientation: SE
Map Datum: WGS-84
Time of Photo: 11:05 AM
Photographer: Jack Arias
Description:

This image shows the lift pit system which is part of the wastewater treatment system. This system received and collected wastewater from trenches, sewers, and hard piping wastewater.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

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



Photograph File Name: P8210103.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.160163 -93.551060
Orientation: SE
Map Datum: WGS-84
Time of Photo: 12:55 PM
Photographer: Jack Arias
Description:

This image shows the surge basin system. This system is the greatest part of the wastewater treatment system. This system received and treated various process wastewater streams from the mill procedures.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

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



Photograph File Name: P8210113.JPG
Date of Photograph: 08/21/2024
Latitude and Longitud: 32.156593 -93.543281
Orientation: SE
Map Datum: WGS-84
Time of Photo: 1:24 PM
Photographer: Jack Arias
Description:

This image shows the overland flow treatment system. Here the wastewater is sprayed onto terraced fields where biodegradation takes place in the soil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

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



Photograph File Name: P8210115.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.160163 -93.551060
Orientation: SE
Map Datum: WGS-84
Time of Photo: 1:24 PM
Photographer: Jack Arias
Description:

This image shows outfall 002 that receives and includes an intermittent overflow of treated combined process wastewater, process area storm water runoff, landfill leachate, utility wastewater, miscellaneous wastewater, non-process area stormwater runoff, and monitored treated sanitary wastewater from internal outfalls 101 and 201.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

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



Photograph File Name: P8210118.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.146420 -93.537589
Orientation: SE
Map Datum: WGS-84
Time of Photo: 1:30 PM
Photographer: Jack Arias
Description:

This image shows outfall 001 that includes 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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

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



Photograph File Name: P8210102.JPG
Date of Photograph: 08/21/2024
Latitude and Longitude: 32.146420 -93.537589
Orientation: SE
Map Datum: WGS-84
Time of Photo: 12:50 PM
Photographer: Jack Arias
Description:

This image shows pathways to outfalls 005 and 006. These outfalls have intermittent discharge of low contamination potential stormwater runoff from the northern (005) and southern (006) sections of the solid waste disposal facility (low contamination potential stormwater runoff from rail yard and rail tracks in the case of outfall 006).