EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	4/22/2024 to 4/23/2024		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	**Graphic Packaging International, LLC**		
Facility Name:	**West Monroe Paper Mill**		
Facility Physical Location:	1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
(city, state, zip code)	West Monroe, Louisiana 71294		
Mailing address:	Post Office Box 35800		
(city, state, zip code)	West Monroe, Louisiana 71294		
County/Parish:	Quachita Parish		
Facility Contact:	Ms. Megan Hilburn	Director of Engineering and Environmental	
	(O) 318.362.2612|(M) 713.447.3513 Megan.Hilburn@graphicpkg.com		
FRS Number:	110017782568		
Identification/Permit Number:	LA0007617 (AI No.1432)		
Media Number:	N/A		
NAICS:	32213 for Pulp/Paperboard Mill		
SIC:	2631 for Paperboard Mill and 2621 for Paper Mill		
Personnel participating in inspection:			
Jack Arias	EPA Region-6 ECD-WA	Inspector	214-665-8164
Megan Hilburn	West Monroe Paper Mill	Director of Engineering and Environmental	318-362-2612
Amanda Layton	West Monroe Paper Mill	Environmental Engineer	318-732-9155
Stephen Morvant	West Monroe Paper Mill	Senior Environmental Engineer	318-355-7407
EPA Lead Inspector Signature/Date	JACK ARIAS Digitally signed by JACK ARIAS Date: 2024.06.20 09:51:12 -05'00'		
	{Jack Arias}		Date
Supervisor Signature/Date	ANTHONY LOSTON Digitally signed by ANTHONY LOSTON Date: 2024.06.20 10:19:40 -05'00'		
	{Anthony Loston}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Jack Arias monitored area around West Monroe Paper Mill on April 22, 2024, and performed an unannounced inspection on April 23, 2024, at 9:30 AM. I met with the Director of Engineering and Environmental, Megan Hilburn; Environmental Engineer, Amanda Layton; Senior Environmental Engineer, Stephen Morvant; and staff at the opening conference. I presented my credentials to facility representatives and informed them that this was an EPA 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 that include 316b cooling water intake structures, discharge processes, effluent limitations, monitoring/sampling requirements, equipment/pipes maintenance, 316b biomonitoring requirements, stormwater pollution prevention plan (SWPP3), SPCC plan, BEPS, record keeping requirements, and facility procedures connected to the permit. Following the opening conference, Ms. Hilburn, Ms. Layton, and Mr. Morvant accompanied me for the entirety of the inspection and gave me a tour of the site in a company vehicle. The Closing Conference was held with all facility representatives where I informed them of the results and observations of the inspection.

FACILITY DESCRIPTION

West Monroe Mill operated under permit LA0007617, effective March 14, 2024. West Monroe Mill is located in West Monroe, in Ouachita Parish, Louisiana, Section 3 of Township 17 North, Range 3 East. The major drainage system for the area is the Ouachita River, which receives treated process wastewater and surface water runoff from most of the site through LPDES Outfalls 001, 002, 005, and 401. LPDES stormwater runoff outfalls also lead to Ouachita River by means of Simms Bayou on the north and the oxbow cutoff lake on the south. West Monroe Mill, also known as Plant 31, manufactures unbleached kraft and pulp to produce paperboard. Ancillary activities include raw material storage and handling (including wood chips, chemicals, and fuels), steam production, and wastewater treatment. The nearest receiving waters are Judy Slough, Toney Bayou, and an unnamed tributary which all lead to the Ouachita River (See Photo Nos. 1 – 25 in Appendix 1).

Section II – OBSERVATIONS

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

This facility uses surface water, treated municipal water, and well water in its processes and for the cooling water intake structure. The facility operates a closed-cycle cooling water system. The system includes one water intake structure (with three pumps) located on the Ouachita River (See Photo Nos. 2 – 4 in Appendix 1). The design flow of the water intake structure is 12.096 MGD. The facility actual intake inflow and withdraws from a freshwater river (Quachita River) is 8.7 MGD (permit determined greater than 2 MGD and less than 10 MGD) and used 1.63 MGD = 18.7 % of intake flow (permit determined that the intake flow must be no greater than 5% of the source water annual mean flow). We observed screens and traveling grates at the pump house (See Photo Nos. 2 – 4 in Appendix 1). According to the facility the depth of the screens are about 8 feet below pool stage (pool stage is 20 feet gage height). At the time of the inspection, we could not determine the design and construction of the screens (part of the water

intake structure) because it was covered by water. The permit requires the design and construction of a screen with an intake velocity of 0.5 ft/s).

Section 316(b) cross-reference sections 301 and 306 of the CWA specified that any standards established pursuant to those sections also require that cooling water intake structures reflect Best Technology Available (BTA). This provision is unique among CWA provisions because it addresses the adverse environmental impact caused specifically by the intake of cooling water, in contrast to other provisions of the Act that regulate the discharge of pollutants into waters of the United States. Facility needs to describe the design and operation of the closed-cycle recirculating system and address the potential adverse environmental impact and impingement reduction by the closed-cycle recirculating system.

Mill River Water Clarifier Tank:
The purpose of the river water clarifiers is to remove solids/sludge from the river water (water intake procedure from Quachita River) through clarification procedures. These procedures consist of two treatments (primary and secondary clarification treatments) through tank systems. These treatments improve the removal of solids/sludge from the river water. At the time of the inspection, I did not observe any deficiencies on the water intake, clarification, containment, and transfer of the tank system (See Photo Nos. 5 – 6 in Appendix 1).

Mill Water Tank Reservoir:
The mill water reservoir is a 1.25-million-gallon capacity holding tank for process water (river, well, and treated City of West Monroe wastewater). Its purpose is to provide capacity water to maintain mill operations for specific period of times. The reservoir provides process water in case of any temporary loss of the primary water source(s). At the time of the inspection, I observed water leaks on the containment wall of the tank and over a water valve that form part of the transfer system of process water. Also, I observed corrosion on the tank's wall and pipes as well as vegetation on the surface water of the tank. The facility needs to improve maintenance of the tank and resolve leaks, corrosion, and vegetation on the reservoir tank and structures (See Photo Nos. 7 – 9 in Appendix 1).

Mill Swimming Pool System:
This is a concrete holding pond referred to as the "swimming pool" that is filled with chlorinated well water that feeds various mill process operations. I did not observe any issues including any malfunctions on the intake, flow, and transfer at the time of the inspection (See Photo No. 10 in Appendix 1).

Mill Pit and High Intensity Aerated Stabilization Basin Processing Areas (all wastewater):
The mill pit is a wastewater treatment system that collects all process wastewater through a system of u-drains that channel to the mill effluent pit where the wastewater is then pumped through a pipe to the primary clarifier that relates to the aerated stabilization basin processing area (See Photo Nos. 11 – 12 in Appendix 1).
The primary clarifier has a 5-million-gallon capacity and approximately 6-8 hours of retention time. The function of the primary clarifier is to remove heavy solids such as ash, grit, fiber, and lime and to skim any oils from the surface (See Photo No. 13 in Appendix 1). After the primary clarifier, the effluent flows into

the aerated stabilization basin (ASB). The ASB is used for the biological treatment of soluble organics in the water from sources such as black liquor, starch, turpentine, methanol, and foul condensate. As the effluent passes through the ASB, bacteria in the water use the organics in the effluent as "food." The bacteria require oxygen to consume the organics; therefore, the ASB is aerated using a system of laterals with diffusers connected to four blowers. After the bacteria consume the organic loading in the effluent, they die off and flocculate and become settleable solids in the effluent (See Photo Nos. 14 – 16 in Appendix 1). These settleable solids are removed from the effluent through a serious of three settling ponds before the effluent is discharged into the Ouachita River. At the time of the inspection, the effluent was monitored to ensure compliance with LPDES Permit limits for pH, total suspended solids, and biochemical oxygen demand. At the time of the inspection, I observed that the process water flow decreases because of continued precipitation in the area. I did not observe any other technical complications about the containment and discharge of process water at the time of the inspection (See Photo No. 17 in Appendix 1).

Outfall 401:
This outfall includes continues discharge of process area storm water in addition to excess storm water from the wet deck recirculation system at the West Monroe Chip Mill. Flows are routed to the wastewater treatment plant (including primary clarification, aerobic biological oxidation, sedimentation, and polishing ponds) which discharges to Outfall 401. Outfall 401 discharges to an unnamed tributary, thence to Outfall 001, thence to the Quachita River. Outfall 401 is located at the discharge point from the polishing ponds. There was flow and discharge at the time of the inspection and the water was observed to have a brown tint (See Photo Nos. 18 – 19 in Appendix 1).

Outfall 001 (Final Discharge Point to Quachita River):
This outfall receives and includes intermittent discharge of previously monitored combined treated mill wastewater from Internal Outfall 401, treated municipal and parish sanitary wastewater from a public owned treatment works serving the City of West Monroe (LPDES permit LA0043982), and non-process stormwater runoff. Outfall 001 is in the southern portion of the property (32.45243, -92.121169) prior to discharge into the Quachita River. I observed outfall 001. There was flow and discharge at the time of the inspection and the water had a brown tint (See Photo No. 20 in Appendix 1).

Outfall 002:
This outfall includes intermittent discharge of runoff from the rail car and tank truck loading and unloading areas, chips, plat roads, employee parking lots, solid waste and scrap metal containers, maintenance shop, storage tanks, partial roof from the N6 and N7 paper machine building, the contractor area north of the N6 and N7 paper machine buildings, roof runoff from plant 70 and natural areas southeast of the rail car switchyard and treated sanitary wastewater. Outfall 002 is centrally located (32.477947, -92.147732) within the facility and discharges into Judy Slough, thence to Toney Bayou, then Quachita River. I observed outfall 002. There was no flow or discharge at the time of the inspection and the water had a green or brown tint (See Photo No. 21 in Appendix 1).

Outfall 003:
This outfall includes an intermittent discharge of non-process area stormwater runoff (including, but not limited to, stormwater runoff from roads and railroads), and storm water that accumulates within the undeveloped wooded area in the southernmost portion of the West Monroe Paper Mill. Parking, scales, and solid waste and scrap metal containers are also located within this drainage area. Additionally, the facility's wood-fired power boiler sluiced ash line traverses the outfall 003 drainage area. There is also a sanitary treatment plant located within the outfall 003 drainage area. Outfall 003 (32.47546, -92.149779) is in a surface drainage ditch that drains to Judy Slough, thence to Toney Bayou, thence to the Quachita River. There was no flow and discharge at the time of the inspection and the water was brown tint (See Photo No. 22 in Appendix 1).

Outfall 004:
This outfall includes an intermittent discharge of non-process area stormwater runoff from the Plant 70 area and warehouse areas including roof runoff and employee parking, and solid waste and scrap metal containers. Outfall 004 is in the northeast corner of the site (32.485181 -92.14545), immediately south of Outfall 005. Outfall 004 discharges into Black Bayou, thence to Toney Bayou, thence to the Quachita River. There was not flow and discharge at the time of the inspection and the water (pool of water) was brown tint (See Photo No. 23 in Appendix 1).

Outfall 005:
This outfall includes an intermittent discharge of non-process area stormwater runoff from the Plant 70 area and warehouse areas including roof runoff, employee parking, and solid waste and scrap metal containers. Outfall 005 is in the northeast corner of the site adjacent to a paved drive and discharges into Black Bayou, thence to Toney Bayou, thence to the Quachita River. There was not flow and discharge observed at the time of the inspection and the water had a brown tint (See Photo No. 24 in Appendix 1).

Cooling Towers Closed-Cycle Recirculating System:
The Cooling Water Systems (GPI) operates several cooling tower systems; two of which are for recovery evaporators/concentrators. 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 #3 and #5 evaporator trains and #5 and #6 concentrators. Water is then returned to the cooling tower. The water is recirculated for multiple cycles for water conservation. Water make-up is added, as needed, to account for blowdown and evaporation. There was no problem or malfunctions observed on the recirculating system at the time of the inspection (See Photo No. 25 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 information that describes the design and operation of the closed-cycle recirculating system and addresses the potential adverse environmental impact and impingement reduction by the closed-cycle recirculating system.
2. Facility should improve maintenance and resolve leaks, corrosion, and vegetation on the mill water reservoir tank and structures.
3. Facility will provide additional information (180 days after permit approval) connected to the public comments (colors in effluents discharged from outfalls 002, 003, 004, and 005 and results above the MQL for Total Aluminum outfall 401) regarding the impact of discharges on water quality from Graphic Packing new permit 2024 approval requirements.
4. Facility will update labels and provide any needed photos above the missing labels at the facility outfalls.
5. Facility will provide updates (180 days after permit approval) about the SWPP3 and SPCC plans.

Section IV – FOLLOW UP

- EPA will provide a copy of the inspection report and hold any necessary meetings to discuss inspection report results, observations, and potential corrective actions.
- Facility will provide and discuss information connected with the observed areas of concern.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 25 photos taken 4/22/2024 to 4/23/2024.
Appendix 2 – 2 diagrams 4/22/2024 to 4/23/2024.

Appendix 1

Photograph Log and

Significant Photo Locations

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010826.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.485205, -92.149951
Orientation:	E
Map Datum:	WGS-84
Time of Photo:	09:35 AM
Photographer:	Jack Arias
Description:	This image shows the name and entrance of the facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010835.JPG
Date of Photograph:	04/23/2023
Latitude and Longitud:	32.488572 -92.125388
Orientation:	E
Map Datum:	WGS-84
Time of Photo:	11:42 AM
Photographer:	Jack Arias
Description:	This image shows the Water Intake Structure that intake fresh water from Quachita River for the cooling and industrial processes at the facility. The facility actual intake inflow and withdraws from a freshwater river (Quachita River) is 8.7 MGD.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010831.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.488572 -92.125388
Orientation:	E
Map Datum:	WGS-84
Time of Photo:	11:37 AM
Photographer:	Jack Arias
Description:	This image shows the water pumps #1, #2, and #3 that are used to intake fresh water from Quachita River for the cooling and industrial processes at the facility. The water passes through intake units through traveling pipes and screens (approximately 3/8-inch square steel mesh each) being pumped by circulating water pumps.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010833.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.488572 -92.125388
Orientation:	E
Map Datum:	WGS-84
Time of Photo:	11:41 AM
Photographer:	Jack Arias
Description:	This image shows screens (approximately 3/8-inch square steel mesh each) being pumped by circulating water pumps at the Water Intake Structure.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010844.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.481707 -92.155541
Orientation:	W
Map Datum:	WGS-84
Time of Photo:	12:21 PM
Photographer:	Jack Arias
Description:	This image shows the Mill River Water Clarifier Tank system (primary and secondary clarification treatment). This system removes solids/sludge from the river water (water intake procedure from Quachita River) prior to mill operations.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010846.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.481707 -92.155541
Orientation:	W
Map Datum:	WGS-84
Time of Photo:	12:24 PM
Photographer:	Jack Arias
Description:	This image shows inside the Mill River Water Clarifier tank system (primary clarification treatment).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010853.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.483716 -92.15419
Orientation:	NW
Map Datum:	WGS-84
Time of Photo:	12:35 PM
Photographer:	Jack Arias
Description:	This image shows the Mill Water Tank Reservoir. Also, this shows a water leak on the containment wall of the tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010851.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.483716 -92.15419
Orientation:	NW
Map Datum:	WGS-84
Time of Photo:	12:34 PM
Photographer:	Jack Arias
Description:	This image shows corrosion on tank structures and growing plants on surface water of the reservoir tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	WaterValve.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.483563 -92.154557
Orientation:	NW
Map Datum:	WGS-84
Time of Photo:	12:45 PM
Photographer:	Jack Arias
Description:	This image shows a water valve's leak that form part of the transfer system of process water at the resevoir tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	SwimmingPoolSystem.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.483807 -92.150182
Orientation:	SE
Map Datum:	WGS-84
Time of Photo:	1:20 PM
Photographer:	Jack Arias
Description:	This image shows a concrete holding pond referred to as the “swimming pool” is filled with chlorinated well water that feeds various mill process operations.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	MillPit.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.479947 -92.15037
Orientation:	SW
Map Datum:	WGS-84
Time of Photo:	1:42 PM
Photographer:	Jack Arias
Description:	This image shows the mill pit which is a wastewater treatment system that collects all process wastewater through a system that drain to the mill effluent pit where the wastewater is then pumped through a pipe to the primary clarifier (basin processing area).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	MillPit.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.479947 -92.15037
Orientation:	SW
Map Datum:	WGS-84
Time of Photo:	1:44 PM
Photographer:	Jack Arias
Description:	This image shows the mill pit collecting process wastewater and transferring wastewater through a pipe to the primary clarifier (basin processing area).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	PClarifier.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.473638 -92.146516
Orientation:	S
Map Datum:	WGS-84
Time of Photo:	2:00 PM
Photographer:	Jack Arias
Description:	This image shows the primary clarifier. It removes heavy solids such as ash, grit, fiber, and lime and skim any oils from the surface.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	Basin.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.472344 -92.145314
Orientation:	S
Map Datum:	WGS-84
Time of Photo:	2:10 PM
Photographer:	Jack Arias
Description:	This image shows the aerated stabilization basin (ASB). The ASB is used for the biological treatment of soluble organics in the water from sources such as black liquor, starch, turpentine, methanol, and foul condensate.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	Basin2.JPG	
Date of Photograph:	04/23/2024	
Latitude and Longitud:	32.472344	-92.145314
Orientation:	S	
Map Datum:	WGS-84	
Time of Photo:	2:15 PM	
Photographer:	Jack Arias	
Description:	This image shows the east part of aerated stabilization basin (ASB).	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	Sampling.JPG	
Date of Photograph:	04/23/2024	
Latitude and Longitud:	32.473438	-92.144849
Orientation:	S	
Map Datum:	WGS-84	
Time of Photo:	2:20 PM	
Photographer:	Jack Arias	
Description:	This image shows the sampling point at the aerated stabilization basin (ASB).	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	SettlingPond.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.449731 -92.13325
Orientation:	SE
Map Datum:	WGS-84
Time of Photo:	3:00 PM
Photographer:	Jack Arias
Description:	This image shows a settling pond. Solids are removed from the effluent through a serious of three settling ponds before the effluent is discharged into the Ouachita River. Effluent is monitored to ensure compliance with LPDES Permit limits for pH, total suspended solids, and biochemical oxygen demand.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	Outfall401.JPG
Date of Photograph:	04/01/2023
Latitude and Longitud:	32.448768 -92.130944
Orientation:	SE
Map Datum:	WGS-84
Time of Photo:	3:10 PM
Photographer:	Jack Arias
Description:	This image shows outfall 401. This outfall includes continuous discharge of process area storm water, excess storm water, and settleable solids from settling ponds.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	UnnamedTribuary.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.448908 -92.130109
Orientation:	SE
Map Datum:	WGS-84
Time of Photo:	3:20 PM
Photographer:	Jack Arias
Description:	This image shows the Outfall 401 discharging into an unnamed tributary, thence to Outfall 001, thence to the Quachita River.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	R0010843.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.45243 -92.121169
Orientation:	SE
Map Datum:	WGS-84
Time of Photo:	12:08 PM
Photographer:	Jack Arias
Description:	This image shows outfall 001 which receives and includes an intermittent discharge of previously monitored combined treated mill wastewater and settleable solids from settling ponds from Internal Outfall 401 and unnamed tributary.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	Outfall002.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.477947 -92.147732
Orientation:	SE
Map Datum:	WGS-84
Time of Photo:	03:25 PM
Photographer:	Jack Arias
Description:	This image shows outfall 002 which receives and includes intermittent discharges of runoff from the rail car and tank truck loading, unloading areas, chips, plat roads, employee parking lots, solid waste and scrap metal containers, maintenance shop, storage tanks, roof run offs, and treated sanitary wastewater.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name:	Outfall003.JPG
Date of Photograph:	04/23/2024
Latitude and Longitud:	32.47546 -92.149779
Orientation:	SW
Map Datum:	WGS-84
Time of Photo:	03:35 PM
Photographer:	Jack Arias
Description:	This image shows outfall 003 which receives and includes intermittent discharges of non-process area stormwater runoff, and storm water that accumulates within the undeveloped wooded area in the southernmost portion of the West Monroe Paper Mill site discharges.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name: Outfall004.JPG
Date of Photograph: 04/23/2024
Latitude and Longitud: 32.485181 -92.14545
Orientation: NE
Map Datum: WGS-84
Time of Photo: 03:45 PM
Photographer: Jack Arias
Description: This image shows outfall 004 which receives and includes intermittent discharge of non-process area stormwater runoff from the Plant 70 area and warehouse areas including roof runoff and employee parking, and solid waste and scrap metal containers.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name: Outfall005.JPG
Date of Photograph: 04/23/2024
Latitude and Longitud: 32.486318 -92.14619
Orientation: NE
Map Datum: WGS-84
Time of Photo: 04:05 PM
Photographer: Jack Arias
Description: This image shows outfall 004 which receives and includes intermittent discharges of non-process area stormwater runoff from the Plant 70 area and warehouse areas including roof runoff and employee parking, and solid waste and scrap metal containers.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

1000 Jonesboro Road Quachita Parish (32.485205, -92.149951)		
West Monroe	County: Quachita Parish	State: Louisiana

Photograph File Name: CoolingTowers.JPG
Date of Photograph: 04/23/2024
Latitude and Longitud: 32.481999-92.15324
Orientation: NW
Map Datum: WGS-84
Time of Photo: 12:50 PM
Photographer: Jack Arias
Description: This image shows outfall 004 which receives and includes intermittent discharges of non-process area stormwater runoff from the Plant 70 area and warehouse areas including roof runoff and employee parking, and solid waste and scrap metal containers.

Appendix 2

Photo No.1

Stormwater Drainage Map

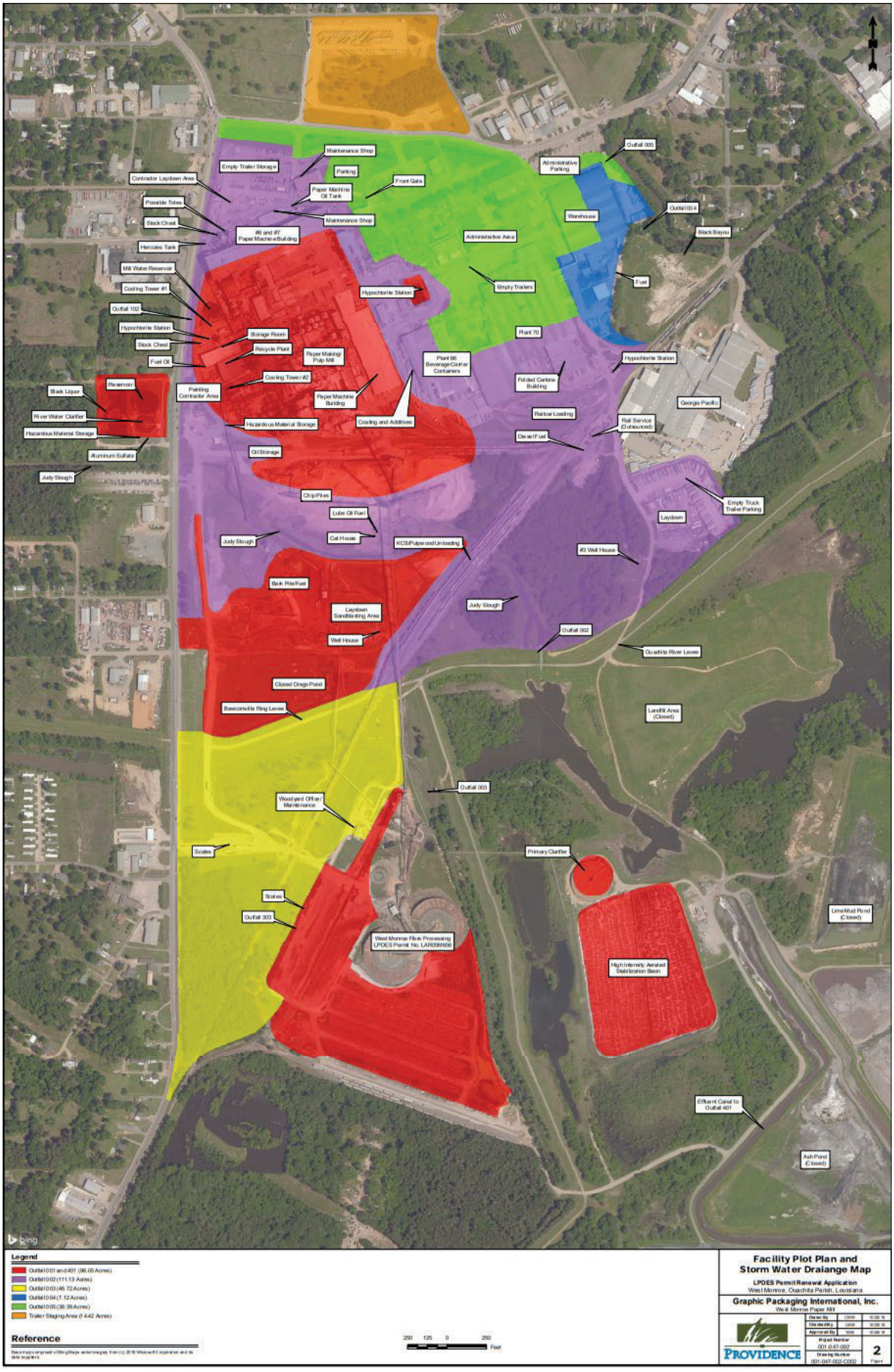

Photo No. 2
Groundwater Contour Map