



# Application for Modification of Ohio NPDES Permit

## Division of Surface Water

### Permits and Compliance Section

Complete the modification form below.

**A. Permit number for which modification is being requested:** 4IA00002\*BD

**B. Name of organization responsible for facility:** Sofidel America Corp.

**C. Address, location, and telephone number of facility producing the permitted discharge:**

**1. Facility Name:** Sofidel America Corp. Circleville

**2. Location: Street:** 25910 US 23

<b>City:</b> Circleville	<b>State:</b> OH	<b>Zip:</b> 43113
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**3. Mailing Address: Street:** 25910 US 23

<b>City:</b> Circleville	<b>State:</b> OH	<b>Zip:</b> 43113
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**Country:** USA

<b>First Name:</b> Randy	<b>Last Name:</b> Kuhner	<b>Title:</b> Health & Safety Manager
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**Email Address:** Randy.Kuhner@sofidel.com

**4. Telephone(area code & no.):** (740) 500-1914

**D. Describe in detail the provision(s) of the permit the applicant wished to modify. (Attach additional pages as necessary)**

With the proposed increase in production capacity it is requested that the allowable wastewater discharge be increased from 0.500 MGD to 0.800 MGD and the pollutant loading (lbs/day) for each parameter within the existing NPDES permit also be increased in direct correlation with this flow increase. The proposed treatment process will be able to meet the same concentration limits within the NPDES permit. Proposed loadings are requested to be increased as shown on Table 1.

**E. Describe in detail the reason(s) a modification is desired. (Attach additional pages as necessary)**

See Ohio Administrative Code 3745-33-04(D) for grounds for modification.

The Sofidel America, Corp. proposes to expand their manufacturing operations to include a third paper machine in order to meet the increased demand for their tissue paper products. The existing NPDES permit provides for wastewater discharge capacity associated with the two existing paper machines and this facility expansion will increase production capacity by approximately 50 percent over current levels.

With this additional paper machine in operation, the plant will subsequently see an increase in process related wastewater discharges from the current permitted level of 0.500 MGD to approximately 0.800 MGD. Sanitary wastewater, including the increase in sanitary wastewater associated with the 100 new employees to be hired by the plant, will continue to be discharged to Earnhart-Hill Regional Water and Sewer District.

To accommodate this increase in wastewater flow Sofidel proposes to construct a new Membrane Bioreactor Treatment process that will supplement the existing activated sludge process to treat the combined wastewater flow.

**F. Name of receiving water or waters:**

Scioto River  
Sciippo Creek

**G. Describe requested modification in sufficient detail to allow Ohio Environmental Protection Agency to process your request.**

If a Permit to Install is required under regulation OAC 3745-42, attach a completed application for a Permit to Install and make no other entries in this section. If a Permit to Install is not required and additional space is needed, provide the additional information on attached sheets.

The requested increase in allowable hydraulic and pollutant loading (Attached Table 1) to the Scioto River under Outfall 001 of the NPDES permit that will accompany the proposed increase in site production capacity is described in the responses above and the attached anti-degradation addendum report.

A permit to install for the proposed preferred alternative of adding a new MBR treatment process to supplement the existing activated sludge process will be submitted for approval upon review and approval of this NPDES permit modification.

**H. Was a Permit to Install Required?(Attach PTI requirement document.)**

YES.

See Attachment: Ohio\_EPA\_PTI\_5-25-17.pdf

**Antidegradation Information:**

open this application to view its antidegradation information.

**Fee**

**Application Fee:** \$200.00

**Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

<b>Applicant Name (print or typed):</b>	<b>Phone No.(area code &amp; no):</b>
<b>Title:</b>	<b>Date:</b>

**ADDITIONAL INFORMATION**

*Please add any additional comments or attachments below.*

Only requesting modification for the discharge to Scioto River via xisting Outfall 001 of the NPDES permit.  
No requested change in the industrial stormwater discharges to Scippo Creek via Outfall 002 in the NPDES permit.  
PTI will be submitted after the NPDES permit is issued.

Additional Information attachment(s): Table 1 Proposed Permit Limit Revisions.pdf

## Division of Surface Water Antidegradation Addendum

In accordance with Ohio Administrative Code 3745-1-05 (Antidegradation), additional information may be required to complete your application for a permit to install or NPDES permit. For any application that may result in an increase in the level of pollutants being discharged (NPDES and/or PTI) or for which there might be activity taking place within a stream bed, the processing of the permit(s) may be required to go through procedures as outlined in the antidegradation rule. The rule outlines procedures for public notification and participation as well as procedures pertaining to the levels of review necessary. The levels of review necessary depend on the degradation being considered/requested. The rule also outlines exclusions from portions of the application and review requirements and waivers that the Director may grant as specified in Section 3745-1-05(D) of the rule. Please complete the following questions. The answers provided will allow the Ohio EPA to determine if additional information is needed.

**All projects that require both an NPDES and PTI should submit both applications simultaneously to avoid going through the antidegradation process separately for each permit.**

**A. Applicant:** Randy Kuhner

**Facility Owner:** Sofidel America Corp.

**Facility Location (city and county):** 25910 US 23, Circleville, OH 43113 County: Pickaway

**Application or Plans Prepared By:**

**Project Name:** Sofidel America Corp. Circleville

**NPDES Permit Number (if applicable):**

**B. Antidegradation Applicability**

**Is the application for? (check as many as apply):**

- Application with no direct surface water discharge (Projects that do not meet the applicability section of 3745-1-05(B)1, i.e., on-site disposal, extensions of sanitary sewers, spray irrigation, indirect discharger to POTW, etc.). (Complete Section E)
- Renewal NPDES application or PTI application with no requested increase in loading of currently permitted pollutants. (Complete Section E, Do not complete Sections C or D).
- PTI and NPDES application for a new wastewater treatment works that will discharge to a surface water. (Complete Sections C and E)
- An expansion/modification of an existing wastewater treatment works discharging to a surface water that will result in any of the following (PTI and NPDES) (Complete Sections C and E).
  - addition of any pollutant not currently in the discharge, or
  - an increase in mass or concentration of any pollutant currently in the discharge, or
  - an increase in any current pollutant limitation in terms of mass or concentration.
- PTI that involves placement of fill or installation of any portion of a sewerage system (i.e., sanitary sewers, pump stations, WWTP, etc.) within 150 feet of a stream bed. Please provide information requested on the stream evaluation addendum (i.e., number of stream crossings, fill placement, etc.) (Complete Section E)
- Initial NPDES permit for an existing treatment works with a wastewater discharge prior to October 1, 1996. (Complete Sections D and E)
- Renewal NPDES permit or modification to an effective NPDES permit that will result in any of the following: (Complete Sections C and E)
  - a new permit limitation for a pollutant that previously had no limitation, or
  - an increase in any mass or concentration limitation of any pollutant that currently has a limitation.

### C. Antidegradation Information

1. Does the PTI and/or NPDES permit application meet an exemption as outlined by OAC 3745-1-05(B)(2) of the Antidegradation rule?

Yes (Provide exemption(s) and justification for each exemption)  
 No

Does the PTI and/or NPDES permit application meet an exclusion as outlined by OAC 3745-1-05(D)(1) of the Antidegradation rule?

Yes (Complete Question C.2)  
 No (Complete Questions C.3 and C.4)

2. For projects that would be eligible for exclusions provide the following information:

- a. Provide justification for the exclusion.
- b. Identify the substances to be discharged, including the amount of regulated pollutants to be discharged in terms of mass and concentration.
- c. A description of any construction work, fill or other structures to occur or be placed in or near a stream bed.

3. Are you requesting a waiver as outlined by OAC 3745-1-05(D)(2-7) of the Antidegradation rule?

Yes  
 No

4. For all projects that **do not qualify** for an exclusion a report must accompany this application evaluating the preferred design alternative, non-degradation alternatives, minimal degradation alternatives, and mitigative techniques/measures for the design and operation of the activity. The information outlined below should be addressed in this report. If a waiver is requested, this section is still required.

- a. Describe the availability, cost effectiveness and technical feasibility of connecting to existing central or regional sewage collection and treatment facilities, including long range plans for sewer service outlined in state or local water quality management planning documents and applicable facility planning documents.
- b. List and describe all government and/or privately sponsored conservation projects that may have been or will be specifically targeted to improve water quality or enhance recreational opportunities on the affected water resource.
- c. Provide a brief description below of all treatment/disposal alternatives evaluated for this application and their respective operational and maintenance needs. (If additional space is needed please attach additional sheets to the end of this addendum).

Alternative Evaluation Report:

Upload File Name(s): FINAL-Sofidel-Antideg-Addendum-Report-9-25-2023.pdf

**At a minimum, the following information must be included in the report for each alternative evaluated.**

- d. Outline of the treatment/disposal system evaluated, including the costs associated with the equipment, installation, and continued operation and maintenance.
- e. Identify the substances to be discharged, including the amount of regulated pollutants to be discharged in terms of mass and concentration.
- f. Describe the reliability of the treatment/disposal system, including but not limited to the possibility of recurring operation and maintenance difficulties that would lead to increased degradation.
- g. Describe any impacts to human health and the overall quality and value of the water resource.
- h. Describe and provide an estimate of the important social and economic benefits to be realized through this proposed project. Include the number and types of jobs created and tax revenues generated.
- i. Describe environmental benefits to be realized through this proposed project.
- j. Describe and provide an estimate of the social and economic benefits that may be lost as a result of this project. Include the impacts on commercial and recreational use of the water resource.
- k. Describe the environmental benefits lost as a result of this project. Include the impact on the aquatic life, wildlife, threatened or endangered species.
- l. A description of any construction work, fill or other structures to occur or be placed in or near a stream bed.
- m. Provide any other information that may be useful in evaluating this application.

### D. Discharge Information

1. For treatment/disposal systems constructed pursuant to a previously issued Ohio EPA PTI, provide the following information:

PTI Number:

PTI Issuance Date:

Initial Date of Discharge:

2. Has the appropriate NPDES permit application form been submitted including representative effluent data?

Yes (go to E)  
 No (see below)

**If no, submit the information as applicable under a or b as follows:**

- a. For entities discharging process wastewater attach a completed 2C form.
- b. For entities discharging wastewater of domestic origin attach the results of at least one chemical analysis of the wastestream for all pollutants for which authorization to discharge is being requested and a measurement of the daily volume (gallons per day) of wastewaters being discharged.

Is a permit to install or plan approval application required for construction of WWTP as per OAC 3945-42?

Yes  
 No

Anticipated date of PTI Application Submission: 12/01/2023

**E.** Based on my inquiry of the person or persons who manage the system of those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete.

**This section must be signed by the same responsible person who signed the accompanying permit application or certification as per 40 CFR 122.22.**

Signature:\_\_\_\_\_

Date:\_\_\_\_\_