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Permit Fact Sheet

(Note: This Fact Sheet prepared for the Public Notice of this permit has not been revised to explain changes to the public noticed permit. An Addendum to Fact Sheet Dated December 2003 explains changes to the Public Noticed Permit.)

1 General Information

Permit Number:	WI-0037389-07-0
Permittee Name:	SCA Tissue North America LLC
Address:	PO Box 2400
City/State/Zip:	Neenah WI 54957-2400
Discharge Location:	190 3rd St., Menasha
Receiving Water:	Little Lake Butte Des Morts
StreamFlow ($Q_{4,30}$):	790 cfs
Stream Classification:	Warmwater Sportfish and Public Water Supply

2 Facility Description

SCA Tissue manufactures a full product line for the commercial and industrial tissue market from deinked pulp made from recycled waste paper. SCA produces a full product line for commercial and industrial markets consisting of napkins, tissue, tablecovers, bathroom tissue and toweling. SCA treats process wastewater in two parallel activated sludge treatment systems and discharges via two separate outfalls to Little Lake Butte Des Morts. Approximately 3.2 MGD is discharged (via Outfall 002) from an activated sludge treatment system constructed in conjunction with the last significant production expansion (in 1989). Approximately 2.7 MGD is discharged (via Outfall 001) from an activated sludge treatment system which existed prior to the last significant production expansion (in 1989). Primary effluent is partially recycled to production processes. Wastewater treatment sludge is disposed of in SCA's landfill. An outfall location map and water balance diagram are attached for reference. The source of water used at SCA is from Little Lake Butte Des Morts. The attached water quality based limits recommendations by the Water Quality Standards Section (WQS) for this permit reissuance dated September 24, 2002 contains additional information on SCA, nearby dischargers and Little Lake Butte Des Morts.

Flow of untreated wastewater is distributed to the two treatment plants to maintain effluent discharge velocity for both outfalls at greater than 10 fps to satisfy one of the requirements for a zone of initial dilution (ZID) included in the previous permits. Flow through Outfall 002 may also be supplemented with uncontaminated river water at a point after the WPDES monitoring station to ensure that effluent discharge velocity is maintained at greater than 10 fps.

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, WasteType/sample Contents and Treatment Description (as applicable)**
001	2.67 MGD Annual Avg.	Treated process wastewater from WW Treatment Plant 1(the first of two parallel activated sludge treatment systems) discharging thru Outfall 001

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, WasteType/sample Contents and Treatment Description (as applicable)**
002	3.17 MGD Annual Avg.	Treated process wastewater from WW Treatment Plant 2 (the second of two parallel activated sludge treatment systems) discharging thru Outfall 002
003 DMR Sample Point		A DMR sample point for tracking WLA limits and reporting requirements for the combined discharge from Outfalls 001 and 002
007 DMR Sample Point		A DMR sample point for tracking compliance with categorical Limits for TSS, BOD_5 and Phosphorus applying to the sum of discharges from Outfalls 001 and 002
104	0.24 MGD Annual Avg.	Outfall 001 ZID makeup flow from newer treatment plant (which discharges thru 002)
105	0.22 MGD Annual Avg.	Outfall 002 ZID make-up water from river
106	2.95 MGD Annual Avg.	Outfall 002 flow without ZID makeup river water

3 Inplant - Proposed Monitoring and Limitations

3.1 Sample Point Number: 104- OUTFALL 001 - ZID MAKE-UP

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	

3.1.1 Changes from Previous Permit:

None.

3.1.2 Explanation of Limits and Monitoring Requirements

Flow monitoring documents continuing augmentation of flow of wastewater to Outfall 001 diverted from Outfall 002 to comply with a requirement to maintain 10 feet/sec discharge velocity to be eligible for a zone of initial dilution.

3.2 Sample Point Number: 105- OUTFALL 002 - ZID MAKE-UP

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	

3.2.1 Changes from Previous Permit:

None.

3.2.2 Explanation of Limits and Monitoring Requirements

Flow monitoring documents continuing augmentation of flow of river water to Outfall 002 after the WPDES monitoring station to comply with a requirement to maintain 10 feet/sec discharge velocity to be eligible for a zone of initial dilution.

3.3 Sample Point Number: 106- OUTFALL 002 - FLOW WTHOUT ZID

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	

3.3.1 Changes from Previous Permit:

None.

3.3.2 Explanation of Limits and Monitoring Requirements

Reporting of flow for Outfall 002 without ZID makeup is continued from the previous permit to document the flow of treated wastewater since uncontaminated river water is also added to maintain a 10 ft/sec discharge velocity.

4 Surface Water - Proposed Monitoring and Limitations

4.1 Sample Point Number: 001-WW TREATMENT PLANT 1 and 002 WW Treatment Plant 2

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		lbs/day	Daily	24-Hr Comp	Categorical limits of daily maximum=15,360 lbs/day and monthly avg.=8,087 lbs/day apply to the sum of the discharge of BOD5 from Outfalls 001 and 002.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					WLA limits and monitoring requirements in 2.2.1.4 and Table1 below also apply from May thru October.
Suspended Solids, Total		lbs/day	Daily	24-Hr Comp	Categorical limits of daily maximum=20,586 lbs/day and monthly avg.=10,954 lbs/day apply to the sum of the discharge of TSS from Outfalls 001 and 002.
Phosphorus, Total		mg/L	Weekly	24-Hr Comp	A 12 month rolling average limit of 1 mg/L applies to the combined discharge of total P from Outfalls 001 and 002.
Temperature		deg F	Daily	Continuous	
Chlorine, Total Residual		ug/L	Quarterly	Grab	TRC monitoring is required on a day when sodium hypochlorite is added directly to the treatment system. Monitoring is not required if chlorine is not added directly to the treatment system for a quarter.
Mercury, Total Recoverable		ng/L	Quarterly	Grab	Samples shall be collected and analyzed according to the requirements in ss. NR 106.145(9) and (10), Wis. Adm. Code.
Acute WET		rTUa	Quarterly	24-Hr Comp	WET testing is required once per year in the calendar quarters specified in 2.2.1.2 of the permit.
Chronic WET		rTUc	Quarterly	24-Hr Comp	WET testing is required once per year in the calendar quarters specified in 2.2.1.2 of the permit.
Dioxins & Furans (all congeners)			Quarterly	24-Hr Flow Prop Comp	Dioxins and Furans are specified in ch. NR 106.16, Wis. Adm. Code. Quarterly monitoring is

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					required for one year which may be reduced to annually thereafter if approved by the Department. See the compliance schedule requirements for Reports and a potential PMP.
pH (Continuous)			Daily	Continuous	See "Continuous pH Monitoring" below for categorical pH limits and allowed excursions

4.1.1 Changes from Previous Permit

The WET testing frequency has been changed to annually for acute and chronic tests (from 3 acute tests and one chronic test during the previous permit). The test method for Mercury monitoring has been specified as the low level test method in NR 106.145. TRC monitoring remains quarterly but is required only when and if sodium hypochlorite (or other form of chlorine) is added to each treatment system. Dioxins and Furans monitoring and data evaluation reporting has been added. Potentially a PMP is also required for Dioxins and Furans if added monitoring indicates a net addition of these parameters at a level of concern. Semiannual PCB monitoring has been completed and has not been retained based on evaluation of the data submitted. Monthly nitrogen (ammonia, total kjehldahl nitrate plus nitrite) monitoring from May thru October (WLA period) has not been retained.

4.1.2 Explanation of Limits and Monitoring Requirements

Water Quality Based Limits and WET Requirements

A detailed evaluation of the need for water quality based limits and whole effluent toxicity testing is presented in the attached Water Quality Standards Section (WQS) recommendations, dated September 24, 2002. Monitoring frequencies are recommended for chlorine, mercury, Dioxins and Furans and WET testing. Dioxin and Furans monitoring may be reduced from quarterly after one year to annually if data warrants. Reported levels of some dioxin and furan congeners were very low (as discussed in the attached WQS recommendations) and no intake water samples were collected to determine if these contaminants are in the intake water. The rationale for compliance schedules included in the permit for an annual mercury report and a report for Dioxin and Furan data evaluation and potentially a PMP is presented in 5 below.

BOD_5 Wasteload Allocation Limits

Water quality based limits for BOD_5 effective May through October included in 2.2.1.4 of the permit are identical to those contained in the previous permit from NR 212, Wis. Adm. Code.

Categorical Limits

Categorical effluent limits for BOD_5, TSS and pH are identical to the limits contained in the previous permit. Limits for BOD_5 and TSS apply to the combined total pounds discharged from both outfalls (see DMR reporting requirements below for an outfall designated as 007). The more restrictive of the water quality based BOD_5 WLA limits and categorical BOD_5 limits apply from May through October.

Categorical effluent limits for BOD_5, TSS and pH are based on NR 284, Wis. Adm. Code, and U.S. EPA categorical standards for the deinking tissue paper subcategory - 40 CFR Part 430 Subpart Q. A summary of applicable categorical limits calculations based on production appears in the table below. These limits for BOD_5 and TSS have been calculated using a production basis of 545 tons/day of tissue paper from deinked pulp based on production figures submitted to the Department in the previous permit application including previously existing production (288 tons/day) and a production expansion in 1989 of 257 tons/day. A limited increase in production reported to 568 tons per day with the 1997 permit application and 593 tons per day with the 2002 permit application will not be accounted for in this permit reissuance. Categorical limits for trichlorophenol and pentachlorophenol are not applicable since a certification of non-use of chlorophenolic containing biocides was submitted with the permit reissuance application.

Categorical Limits Calculations for Outfalls 001 and 002 (identical to the previous permit)

Parameter	Production Basis[1] (Tons/Day)	Conversion Factor[2] (Lbs/Ton)	Effluent Limitations (Lbs/Day)
BOD_5 - 30 Day Avg.	Existing - 288	18.8	8087
	1989 New Source Expansion - 257	10.4	
BOD_5 - Daily Max.	Existing - 288	36.2	15360
	1989 New Source Expansion - 257	19.2	
TSS - 30 Day Avg.	Existing - 288	25.9	10954
	1989 New Source Expansion - 257	13.6	
TSS - Daily Max.	Existing - 288	48.1	20586
	1986 New Source Expansion - 257	26.2	

1. The existing production basis of 288 T/D subject to BPT limits was documented in the permit reissuance application received in December 1987. The production basis for 257 T/D subject to NSPS was documented as part of a production expansion including a new paper machine in 1989 which was included in the permit issued in 1989. The permit reissuance applications received in 1997 and July 2000 reported similar production levels.

2. Effluent limitations are specified in NR 284, Wis. Adm. Code and 40 CFR-Part 430-Subpart Q (Deinking Subcategory - Tissue Paper).

4.2 WATER QUAL INFO FOR BOD_5 WLA Requirements(designated on the DMRs as Sample Point Number- Outfall 003)

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow River		cfs	Daily	Continuous	
WLA Previous 4 Day Avg River Flow		cfs	Daily	Calculated	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
WLA Previous Day River Temp		deg F	Daily	Continuous	
WLA Value		lbs/day	Daily	Calculated	
WLA Adjusted Value		lbs/day	Daily	Calculated	
BOD5, Total	Daily Max - Variable	lbs/day	Daily	24-Hr Comp	
WLA 7 Day Sum Of WLA Values		lbs/day	Daily	Calculated	
WLA 7 Day Sum Of BOD5 Discharged	Daily Max - Variable	lbs/day	Daily	Calculated	

4.2.1 Changes from Previous Permit

No changes are included to the monitoring and reporting requirements and limits for BOD_5 Wasteload Allocations.

4.2.2 Explanation of Limits and Monitoring Requirements

This table identifies columns appearing on the DMRs for monitoring and reporting required by WLA narrative requirements in section 2.2.1.4 of the permit. For simplicity it does not appear in the permit since it is not an actual Outfall to the environment but is used in the Dept's. computer system for determining compliance with WPDES permits.

4.3 COMBINED DISCHARGE thru Outfalls 001 & 002 (designated on the DMRs as Sample Point Number-Outfall 007)

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
BOD5, Total	Monthly Avg	8,087 lbs/day	Daily	Calculated	
BOD5, Total	Daily Max	15,360 lbs/day	Daily	Calculated	
Suspended Solids, Total	Daily Max	20,586 lbs/day	Daily	Calculated	
Suspended Solids, Total	Monthly Avg	10,954 lbs/day	Daily	Calculated	
Phosphorus, Total	Rolling 12 Month Avg	1.0 mg/L	Weekly	24-Hr Comp	

4.3.1 Changes from Previous Permit

None.

4.3.2 Explanation of Limits and Monitoring Requirements

This table identifes columns appearing on the DMRs for reporting the calculated combined discharge of BOD and TSS thru Outfalls 001 and 002 to determine compliance with categorical limits which apply to the combined discharge. Reporting needed to demonstrate compliance with the Phosphorus 12 month rolling average limit applying to the combined discharge thru Outfalls 001 and 002 is also included. For simplicity this table does not appear in the permit since it is not an actual outfall to the environment but is used in the Dept's. computer system for determining compliance with WPDES permits.

5 Compliance Schedules

5.1 Annual Status Report Mercury Minimization Program

Required Action	Date Due
Submit Annual Status Reports: The permittee shall submit to the Department an annual status report to summarize and evaluate quarterly mercury effluent monitoring data and other relevant information such as intake water data voluntarily collected to document background levels of mercury. The report shall also document any continuing reasonable cost effective efforts to identify and reduce any potential sources of mercury in the effluent. The first annual report shall be due on December 31, 2003.	

5.2 Pollutant Minimization Program - Dioxins and Furans

Required Action	Date Due
Report Evaluating Additional Dioxin and Furan Monitoring Data: The permittee shall submit a report evaluating additional monitoring data for Dioxins and Furans on representative effluent samples and intake water samples as voluntarily monitored. If there is a net addition of Dioxins and Furans and if these pollutants are present at levels of concern, a PMP is required to be submitted as specified in the additional provisions below.	03/31/2004
Plan Development: If determined to be needed based on the report required above for evaluation of additional monitoring data, the permittee shall develop and submit to the Department a plan for a cost-effective pollutant minimization program (PMP) which has as its goal the reduction of Dioxins and Furans for the purpose of maintaining the effluent at or below the water quality based effluent limitation. The PMP plan shall specify actions to be taken that consist of investigation of treatment technologies and efficiencies, process changes, wastewater reuse or other pollution prevention techniques that are appropriate for that facility, taking account of the permittee's overall treatment strategies, facilities plans and operational circumstances. The plan shall also identify past pollution prevention or minimization efforts implemented by the permittee. Unless less frequent monitoring or no monitoring is approved by the Department based on information generated in the pollutant minimization plan, a PMP shall include: 1) An annual review and semi-annual monitoring of potential sources of the pollutant, which may include fish tissue monitoring and other bio-uptake sampling; 2) Quarterly monitoring for the pollutant in the influent to the wastewater treatment system; and 3) A control strategy designed to maintain potential sources of the pollutant at levels which will insure compliance with the water quality based effluent limitation.	12/31/2004

Past documented pollution prevention or treatment may be used to satisfy all or part of this PMP requirement. NOTE: The Department will notify the permittee of acceptance of or comments on the proposed PMP. If the Department has not notified the permittee within 90 days of the Department's receipt of the PMP, the permittee may assume the PMP has been accepted.	
Implementation: If determined to be needed, the permittee shall implement the pollutant minimization program as submitted or as amended by agreement of the permittee and the Department.	09/30/2005
Annual Status Report: If determined to be needed, the permittee shall submit to the Department an annual status report that provides: 1) All minimization program monitoring results for the previous year; 2) A list of potential sources of the pollutant; and 3) A summary of all action taken to reduce or eliminate the identified sources of the pollutant. Submittal of the first annual status report is required by the 12/31/2005.	

5.3 Explanation of Compliance Schedules

Mercury

An annual status report has been retained from the previous permit to summarize and evaluate mercury quarterly low level monitoring data on effluent and other relevant data such as intake water voluntarily collected by SCA. The report will also document SCA's reasonable continuing efforts to identify and minimize any potential sources of mercury that are cost effective which was initiated during the previous permit. The permit requirement to use the approved low level test method in NR106.45 will provide further documentation of whether mercury is discharged above background levels in intake water. The first annual status report is due on December 31, 2003. These requirements are consistent with NR 106.45 Wis. Adm. Code.

Dioxins and Furans

A report on quarterly monitoring data for Dioxins and Furans during the first year of the permit will be used to determine whether a PMP will be needed. A PMP will be necessary if there is a net addition of Dioxins and Furans above intake water levels and they are present at levels of concern. The attached water quality based limit recommendations provide a detailed discussion of data for dioxins and furans and also contain levels of concern. There was no intake water monitoring for these contaminants submitted with the permit application. There may be changes to these provisions if more data is submitted prior to reissuance of the permit or if additional relevant information on the laboratory detection levels for these contaminants becomes available to the Department. An inspection by the Department of the laboratory which provided test results for dioxins and furans is scheduled during the next month.

6 Special Reporting Requirements

NA.

7 Other Comments:

A tier 1 General WPDES permit has been issued to SCA for storm water (WI-S067849) which includes but is not limited to requirements for implementation of BMPs, visual inspections and limited sampling during specified storm events. SCA also has storm water general permits for it's warehouse and converting facilities in Menasha.

Discharge report monitoring data from 1/99 to 7/02 is also attached (as an excel spreadsheet which is available as an electronic document).

8 Attachments:

Substantial Compliance Determination

Water Flow Schematic(s)

Map(s)

Water Quality Based Effluent Limits dated September 24, 2002

WET Checklist Summary

Public Notice

Discharge Monitoring Data from 1/99 to 7/02 (as an excel spreadsheet available as an electronic document)

9 Proposed Expiration Date:

December 31, 2007

Prepared By:

David Hantz, P.E.

Environmental Engineer

Date: November, 2002

cc: **Jim Savinski Oshkosh & Northeast Region**

General Information

Permit Number:	WI-0037389-07-0
Permittee Name:	SCA Tissue North America LLC
Address:	PO Box 2400
City/State/Zip:	Neenah WI 54957-2400
Discharge Location:	190 3rd St., Menasha
Receiving Water:	Little Lake Butte Des Morts
StreamFlow ($Q_{4,30}$):	790 cfs
Stream Classification:	Warmwater Sportfish and Public Water Supply

Changes to the Proposed Public Noticed WPDES Permit

Changes to the public noticed draft permit have been made based on evaluation of comments received during the public notice period from the WI Paper Council and SCA Tissue in a letter dated December 26, 2002 (attached). Comments questioned proposed permit requirements for dioxin and furan congeners based on serious problems identified with the validity of the lab data submitted, as discussed further below.

- **Change to Requirements for Dioxin and Furan Congeners**

  The requirement for quarterly monitoring for Dioxin and Furan congeners for Outfalls 001 and 002(in public noticed permit table 2.2.1, which could have potentially been reduced to annually thereafter) has been removed. A compliance schedule has been added (in the revised final permit condition 3.2 below) requiring retesting of these congeners and submittal of results by Dec. 31, 2004 (or participation in an equivalent study organized by the WI Paper Council with the technical assistance of NCASI). The requirement to perform a PMP if needed based on evaluation of the results of the first year of testing for Dioxin and Furan congeners (in public noticed permit condition 3.2) has been removed from the permit.

Permit Compliance Schedule 3.2 - Dioxin and Furan Congeners Testing

Required Action	Date Due
Test Requirements: The permittee shall test a representative sample of effluent from Outfall 001 and Outfall 002 for the dioxin and furan congeners listed in s. NR 106.16, Wis. Adm. Code. The frequency of testing shall be at least once but additional testing may be performed. Effluent test results and results from the accompanying laboratory blank shall be submitted to the Department within one year of permit reissuance. Samples of mill intake water and wastewater treatment system sludge may also be analyzed. The Department highly recommends that the permittee inform its laboratory that test results must be reported for all detected congeners and limits of detection must be reported for congeners that are not detected. The permittee should also request that its laboratory take extra care to prevent contamination of samples. Such notification should take place prior to sample collection. The permittee may satisfy this permit requirement by participating in the study to measure dioxins and furans in effluents and receiving waters as organized by the Wisconsin Paper Council, in cooperation with the Department, and managed by the National Council for Air and Stream Improvement, Inc.	12/31/2004

Further evaluation of SCA data for dioxin and furan congeners by the Department occurred after submittal of the comment letter by the Wisconsin Paper Council and SCA. In its application for permit reissuance, SCA Tissue reported effluent test results for the seventeen congeners of 2,3,7,8-substituted polychlorinated dibenzo-*p*-dioxins (PCDDs or dioxins) and polychlorinated dibenzofurans (PCDFs or furans). Several congeners were detected. Intake water samples were not tested for dioxin and furan congeners.

From discussions with laboratories that perform dioxin testing, the Department has learned that laboratory contamination of effluent samples is not unusual, especially at levels near the limits of detection. Consequently, detects of dioxins and furans may reflect laboratory clean-up practices rather than effluent quality.

Laboratories also tell the Department that with extra care, contamination of effluent samples by sources within the laboratory can be reduced if not completely eliminated. To provide this level of care, however, the laboratory must be informed beforehand that the Department will be using test results near the limits of detection in its evaluation.

At this time, the Department concludes that most if not all detects of dioxins and furans in the SCA Tissue effluent sample are due to laboratory contamination. Therefore, the sample results are not representative of SCA Tissue's discharge.

The proposed permit reissuance requires SCA Tissue to retest its effluent for dioxins and furans and to report the test results to the Department by December 31, 2004. SCA Tissue should inform its laboratory that all detects must be reported and that extra care must be used to avoid laboratory contamination of the effluent sample.

After evaluation the new test results, the Department will modify the SCA Tissue discharge permit to impose water quality-based effluent limitations and monitoring requirements if necessary.

The Department encourages SCA Tissue to also test its untreated intake water and wastewater treatment system sludge for the seventeen 2,3,7,8-substituted dioxin and furan congeners. The Department will take test results for intake water and sludge into consideration when it evaluates effluent test results.

- **Addition of a Mercury Field Blank Requirement**

  Addition of a permit footnote on mercury testing requires submittal of results of testing a field blank (permit condition 2.2.1.2) when sampling is performed to be consistent with requirements in NR 106.145 Wis. Adm. Code. It is noted that the DMRs will have 2 new sample points for voluntary intake water monitoring for mercury (DMR sample point 701) and for reporting the mercury field results (DMR sample point 107).

Additional changes to update requirements of the proposed permit due to the time lapsed since public notice are listed below.

- **Change of WET Test Dates**

The Acute and Chronic WET testing dates were changed to eliminate the tests in the public noticed permit for April - June 2003 and to add tests for April to June 2008.

- **Change of Permit Effective and Expiration Date**

The permit effective date was changed from 02/01/03 to 01/01/04 and the expiration date was changed to from 12/31/07 to 12/31/08.

Prepared on December 19, 2003 by:

Dave Hantz, P.E.

cc: Permit File – Region and Central Office
James Savinski