dhec
Healthy People. Healthy Communities.

July 7, 2021

Tony Hobson
New-Indy Catawba LLC
PO Box 7
Catawba, SC 29704

Re: June 25, 2021 New-Indy Catawba Mill CAP Revision 1

Dear Mr. Hobson,

Attached please find the Department's response to the New-Indy Catawba Mill Corrective Action Plan Revision 1 submitted on June 25, 2021. All comments shall be addressed and a final approvable CAP submitted by July 12, 2021.

Sincerely,

Renee G. Shealy, Chief
Bureau of Environmental Health Services

DHEC Comments to Revision 1 of New-Indy CAP

Submitted June 25, 2021

Please address the following and incorporate into the CAP by July 12, 2021. New-Indy shall implement all items in the CAP in accordance with timelines established therein.

General

- There is a typo on a guidance document date (December 2021) for "Mechanistic Approach for Estimating Hydrogen Sulfide Emissions from Wastewater Treatment Plants". It appears the correct date is December 2012. Please revise with the correct date.
- Please provide more information on the calcium nitrate addition. The Department has not yet received a pilot study request for that activity.

Section 4.4 Ambient Air Monitors

- The additional description of the pre-order monitoring does not provide the specific locations of the first two installed monitors prior to relocation to meet EPA requirements for fenceline monitoring.
- The Appendix C map does not indicate monitor locations prior to relocation.
- The Appendix D hourly H2S data does not include data from the initial monitoring prior to relocations or data for the current monitors prior to May 28, 2021.

Section 7.2.2 Adequacy and appropriateness of waste treatment that is occurring in the Aerated Stabilization Basin (ASB)

- The CAP states, "New-Indy has routinely collected samples from the ASB influent, effluent and within the ASB for process control parameters such as BOD5, TSS, pH and temperature. As part of preparations for full scale unbleached operations and foul condensate hard pipe loading, New-Indy revised the ASB sampling regimen to include methanol sampling as well as sampling of the foul condensate stream in January 2021." As requested in our previous comments, please provide a summary of the process control data collected for the ASB since January 2021.

7.3 Corrective Actions and Timeline

- For every corrective action provide a definite timeline, timeframe and/or deadline for when the action will be started and when it will be completed and any interim timeframes as needed to demonstrate a clear plan for implementation. This includes but is not limited to:

- *The long-term plan for pressing and removing the sludge from the primary clarifier;*
- *Reducing the non-wastewater loads to the primary clarifier; and*
- *Investigation of the proper handling method for the non-wastewater loads that will no longer be sent to the primary clarifier.* The CAP addresses the previous curtains and states they may not be replaced based on the anticipated changes at the WWTF. Are the old curtains still in the ASB? If so, could these curtains potentially dislodge and interfere with proper operation of the aerators or could their presence cause solids to build around them and interfere with flow?

Item 1

- The flow through the holding pond is referenced as a concern, but was not addressed. Flow appears to travel near the eastern and southern banks of the pond, leaving a portion of the pond that appears to be stagnant rather than moving through and out of the pond. How will this be addressed? "Fiber and liquor losses in production may have contributed to the formation of the floating fiber layer. The causes and remedies for these fiber and liquor losses will be investigated as a corrective action." Please provide a deadline for completion of this evaluation and the plan for implementation for needed remedies to include timeframe.

Item 2

- Page 7-17 of the CAP states that New Indy is performing a risk assessment to evaluate risks associated with dioxin in sludge. In a letter dated May 14, 2021, the Department requested a preliminary outline of New Indy's risk assessment assumptions by July 15, 2021.
- New Indy's proposed measures related to wastewater treatment/sludge management to reduce H2S emissions appear necessary, but are not fully consistent with the objectives of the voluntary oversight contract as noted below regarding wastewater treatment units where dioxin contaminated sludge is present:
  - Sludge Lagoon 1 continues to be used to accept backwash and river mud from raw water filtration;
  - Wastewater Lagoon 1 has been put into more active use with the installation of aerators which could disturb dioxins in sludge in this lagoon where the outfall to the Catawba River is located;
  - Sludge Lagoon 4 continues to be used for disposal of sludge. The CAP does not identify a time frame for closure of Sludge Lagoon 4.
- In accordance with the Voluntary Oversight Contract, New Indy was to have provided geotechnical studies with a Closure Plan for Sludge Lagoon 4. It appears that New Indy does not plan to complete closure of Sludge Lagoon 4 in the near future. Therefore, given the current sludge management activities onsite to remove solids and sludge to

address the hydrogen sulfide emissions created from the increased solids and sludge in the wastewater treatment system, please provide the following by August 30, 2021:

  - Current geotechnical studies that address capacity of Lagoon 4 that account for the increased amount of sludge and solids under the current and ongoing sludge and solids management onsite, and
  - Conduct a gas study of that includes H2S and methane emissions from Lagoon 4.

- The CAP states the ASB and H2S modeling were done using the 2015 solids survey. For the ASB modeling using up-to-date information, please confirm that an updated solids survey based on the current sludge/solids management will be performed to use in the up-to-date modeling.

Item 3

- The CAP references a long-term plan to manage non wastewater solids and states there is no timeline for this plan. Please provide a timeline that includes an analysis of options and timeframe for plan development and implementation.