

**From:** [Pennington, Aaron](#)  
**To:** "Kim Lute"  
**Cc:** [Atwood, Brandon](#); [Cycyk, Allison](#); [aaron.a@uspapermill.us](mailto:aaron.a@uspapermill.us)  
**Subject:** BMP Plan COD Testing discontinuation written acceptance  
**Date:** Monday, March 16, 2026 12:16:00 PM  
**Attachments:** [image001.png](#)

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Kim,

Given that the current state of pulp mill operation is in "idle" status and that the potential sources for leaks/spills of black liquor, soap, and/or turpentine have been emptied and flushed/rinsed, Ohio EPA accepts the discontinuation of daily COD testing as requested. Please keep this written acceptance with your BMP plan maintained at the site. As noted, if pulping operations or another process with a high COD stream operates in the future, the BMP plan and COD sampling will be updated and re-implemented

*Aaron Pennington*

Environmental Specialist 3  
Division of Surface Water - Southeast District Office  
740-380-5272



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**From:** Kim Lute <[kim.l@uspapermill.us](mailto:kim.l@uspapermill.us)>  
**Sent:** Monday, March 16, 2026 11:44 AM  
**To:** Pennington, Aaron <[Aaron.Pennington@epa.ohio.gov](mailto:Aaron.Pennington@epa.ohio.gov)>  
**Cc:** Atwood, Brandon <[Brandon.Atwood@epa.ohio.gov](mailto:Brandon.Atwood@epa.ohio.gov)>; Cycyk, Allison <[Allison.Cycyk@epa.ohio.gov](mailto:Allison.Cycyk@epa.ohio.gov)>; [aaron.a@uspapermill.us](mailto:aaron.a@uspapermill.us)  
**Subject:** Re: Request re: BMP Plan COD Testing

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Aaron,

Black liquor, soap, and turpentine are not currently stored or used at this site. When Pixelle shut down the pulping systems, the equipment, tanks, and piping in the Recovery Furnace, Evaporators, and Pulp Mill areas that contained black liquor, soap, and/or turpentine were emptied, flushed with boilout water, and flushed with mill process water. This was part of the Cessation of Regulated Operations that Pixelle is completing.

Please let me know if you have any additional questions.

Thanks,  
Kim

On Mon, Mar 16, 2026 at 8:36 AM [Aaron.Pennington@epa.ohio.gov](mailto:Aaron.Pennington@epa.ohio.gov)  
<[Aaron.Pennington@epa.ohio.gov](mailto:Aaron.Pennington@epa.ohio.gov)> wrote:

Kim,

In review of permit [01A00002.pdf](#), the respective BMP plan is shown Part Item, Item K. You have identified that “The pulping operations, including any use of black liquor, soap, and turpentine, are currently idled.” Furthermore, “US Paper Mill requests to discontinue daily COD load monitoring for the BMP Plan. If pulping operations or another process with a high COD stream operates in the future, the BMP plan and COD sampling will be updated and re-implemented.”

*K. The permittee shall implement the Best Management Practices (BMP) Plan for spent pulping liquor, soap and turpentine management, spill prevention and control as required by 40 CFR 430.03. The primary objective of the BMPs is to prevent leaks and spills of spent pulping liquors, soap and turpentine. The secondary objective is to contain, collect and recover at the immediate process area, or otherwise control, those leaks spills and intentional diversions of spent pulping liquor, soap and turpentine that do occur.*

*The BMP Plan shall be based on a detailed engineering review of the pulping and chemical recovery operations that would result in procedures that achieve the objectives of the BMP.*

*Whenever the influent monitoring results exceed an action level identified in the BMP, the permittee shall take the appropriate investigative or corrective action as defined in 40 CFR 430.03(i)(2). Failure to take such appropriate action is a violation of this permit. Annual reprotos required by 40 CFR 430.03(i)(4) shall be submitted to the Ohio EPA Southeast District Office by March 1 of each year for the previous calendar year.*

*The permittee shall review and evaluate the BMP Plan every five years after the initial preparation of the Plan. The permittee shall maintain on-site a complete copy of the current BMP Plan and at least three years of monitoring records. The plan must be amended and re-submitted to the Ohio EPA Southeast District Office whenever there is a change in mill operations that affects the potential for leaks or spills.*

Can you confirm that these sources(**black liquor, soap, and turpentine**) associated with the pulping operations are no longer present at the site (i.e. tanks were emptied, lines flushed, etc.)?

*Aaron Pennington*

Environmental Specialist 3

Division of Surface Water - Southeast District Office

740-380-5272



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**From:** Kim Lute <[kim.l@uspapermill.us](mailto:kim.l@uspapermill.us)>  
**Sent:** Friday, March 13, 2026 3:13 PM  
**To:** Pennington, Aaron <[Aaron.Pennington@epa.ohio.gov](mailto:Aaron.Pennington@epa.ohio.gov)>  
**Subject:** Fwd: Request re: BMP Plan COD Testing

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Sorry...typed the "ohio" in your email incorrectly when I sent this!

----- Forwarded message -----

**From:** **Kim Lute** <[kim.l@uspapermill.us](mailto:kim.l@uspapermill.us)>  
**Date:** Fri, Mar 13, 2026 at 3:09 PM  
**Subject:** Request re: BMP Plan COD Testing  
**To:** <[aaron.pennington@epa.oh.gov](mailto:aaron.pennington@epa.oh.gov)>  
**Cc:** Brandon Atwood <[Brandon.Atwood@epa.ohio.gov](mailto:Brandon.Atwood@epa.ohio.gov)>, Aaron Anders <[aaron.a@uspapermill.us](mailto:aaron.a@uspapermill.us)>

Aaron,

Thank you for speaking with me today. As discussed, US Paper Mill took ownership of the Pixelle Chillicothe facility in October 2025. The pulping operations, including any use of black liquor, soap, and turpentine, are currently idled. NPDES permit (Part II.K.) requires implementation of a Best Management Practices (BMP) Plan for spent pulping liquor, soap, and turpentine management, spill prevention, and control as required by 40 CFR 430.03. The facility conducts daily composite sampling and testing of Chemical Oxygen Demand (COD) loading to the wastewater treatment plant's biological side. A lower action level of 214,000 pounds COD per day and an upper action level of 230,000 pounds COD per day are set in the plan based on historical data from the waste treatment plant. The lower action level triggers an investigation into the cause of increased wastewater loading. The upper action level triggers corrective actions to reduce influent loading below the lower action level as quickly as practicable.

Since January 2026, the average COD loading has been approximately 3,100 lb COD/day. US Paper Mill requests to discontinue daily COD load monitoring for the

BMP Plan. If pulping operations or another process with a high COD stream operates in the future, the BMP plan and COD sampling will be updated and re-implemented.

Please let us know if this is acceptable or if you need any further information to evaluate the BMP Plan monitoring request.

Thanks,  
Kim

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Kim Lute  
Environmental Manager  
US Paper Mill Company, LLC  
[Kim.L@uspapermill.us](mailto:Kim.L@uspapermill.us)



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Kim Lute  
Environmental Manager  
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Kim Lute  
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