From:	Yach, James A - DNR
To:	Kipper, Ann M - DNR; Antonuk, Connie J - DNR
Cc:	Ryzak, Arthur C - DNR; DeVenecia, Eric R - DNR; Balk Ludwig, Michelle M - DNR; Paddock, Jeffrey J - DNR
Subject:	Re: Follow-up as Requested: Rhinelander papermill Ahlstrom
Date:	Thursday, October 26, 2023 9:08:30 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png

Yes thank you all!

From: Kipper, Ann M - DNR <Ann.Kipper@wisconsin.gov>
Sent: Wednesday, October 25, 2023 11:32 AM
To: Antonuk, Connie J - DNR <Connie.Antonuk@wisconsin.gov>; Yach, James A - DNR <JamesA.Yach@wisconsin.gov>
Cc: Ryzak, Arthur C - DNR <arthur.ryzak@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>; Balk Ludwig, Michelle M - DNR <michelle.balkludwig@wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Subject: RE: Follow-up as Requested: Rhinelander papermill Ahlstrom

Thank you all! A concerned citizen who lives across the river from the WWTP sent me the photo and asked me what was going on. This summary is very helpful.

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Ann Kipper
she, her, hers
Administrator – External Services Division
Wisconsin Department of Natural Resources
Phone: 608-733-1336
Ann.Kipper@wisconsin.gov

dnr.wi.gov

From: Antonuk, Connie J - DNR <Connie.Antonuk@wisconsin.gov>
Sent: Tuesday, October 24, 2023 7:09 PM
To: Kipper, Ann M - DNR <Ann.Kipper@wisconsin.gov>; Yach, James A - DNR <JamesA.Yach@wisconsin.gov>
Cc: Ryzak, Arthur C - DNR <arthur.ryzak@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>; Balk Ludwig, Michelle M - DNR <michelle.balkludwig@wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Subject: Follow-up as Requested: Rhinelander papermill Ahlstrom

Ann and James:

Here is the summary of the investigative work that was done to determine why the city of Rhinelander's wastewater treatment plant outflow appeared to be uncharacteristically foaming upon discharge. Please read the summary emails below. Our wastewater and spill response staff, Ryzak and Paddock, are determining if any further action is needed with Lake States Yeast or the city of Rhinelander sewage treatment plant. As you can see in the summary emails below, the liquid waste that was being sent to the city WWTP that was potentially causing the foaming is no longer being processed at the city WWTP. If you have any further questions, please follow up directly with our technical staff. Connie

---

From: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Sent: Tuesday, October 24, 2023 6:21 PM
To: Ryzak, Arthur C - DNR <arthur.ryzak@wisconsin.gov>
Cc: Douglas, Richard W - DNR <richard.douglas@wisconsin.gov>; Ryan, Tim M - DNR <Tim.Ryan@wisconsin.gov>; Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>; Balk Ludwig, Michelle M - DNR <michelle.balkludwig@wisconsin.gov>; Antonuk, Connie J - DNR <Connie.Antonuk@wisconsin.gov>; Marti, Aaron M - DNR1 <aaronm.marti@wisconsin.gov>
Subject: RE: Rhinelander papermill Ahlstrom

Hi Arthur,

FYI, Aaron Marti received a complaint about foam on the river on October 18th and sent an e-mail asking for information (see attached). Ahlstrom had a power outage on October 13th, which led to a 77,000-gallon process water release. The release was not reported to the hotline until October 17th. I went to Hat Rapids on October 18 and saw no indication of foam or impacts to the river. I also talked to two fishermen, who had not seen any foam on the river. The papermill has submitted documentation regarding the spill, which is being reviewed. Based off your e-mail it seems that the foam that was observed is associated with the WWTP. Please let me know if you need any assistance.

Thank you.

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Jeff Paddock
Phone: 715-828-8544
Jeffrey.Paddock@Wisconsin.gov

From: Ryzak, Arthur C - DNR <arthur.ryzak@wisconsin.gov>
Sent: Tuesday, October 24, 2023 5:31 PM
Cc: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Douglas, Richard W - DNR <richard.douglas@wisconsin.gov>; Ryan, Tim M - DNR <Tim.Ryan@wisconsin.gov>; Popieluch,

Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>; Balk Ludwig, Michelle M - DNR <michelle.balkludwig@wisconsin.gov>; Antonuk, Connie J - DNR <Connie.Antonuk@wisconsin.gov>
Subject: FW: Rhinelander papermill Ahlstrom

Hi everyone, copying you all to make sure no one is left out of the loop on this.
Please let me know if you have any questions or would like to discuss.

Thanks,

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Arthur Ryzak, P.E.
Mobile: (715) 403-2924
arthur.ryzak@wisconsin.gov

From: Ryzak, Arthur C - DNR
Sent: Tuesday, October 24, 2023 5:06 PM
To: Antonuk, Connie J - DNR <Connie.Antonuk@wisconsin.gov>
Subject: RE: Rhinelander papermill Ahlstrom

Hi Connie,
I contacted the Rhinelander Paper Mill at 3:07 PM today and they confirmed that the outfall in the picture was not associated with their facility. I then contacted the City of Rhinelander WWTF at 3:55 PM and spoke with Curtis Johnson, Operator in Charge and Jody Flannery, Lab Director. I asked if they have had any recent foaming at their outfall. They confirmed that they have had recent foaming within their treatment facility and at the outfall, and that they believe this foaming is associated with an industrial waste from Lake States Yeast that they began receiving on Oct 13, 2023. As described by Curtis and Jody, Lake State Yeasts had been sending their wastewater to the paper mill, but on October 13 the mill experienced a transformer outage and temporarily could not accept the wastewater from Lake State Yeasts. Lake State Yeasts asked City of Rhinelander WWTF if they could accept their wastewater, and on October 13 the City began receiving the wastewater. On Sunday, Oct 22 City of Rhinelander stopped accepting the waste from Lake State Yeasts, and this waste is now once again being sent to the papermill.

I asked Curtis and Jody if they have had any effluent exceedances since they began accepting the wastewater from Lake States Yeast, and they indicated that so far there have been no effluent exceedances, and that they sample the effluent daily, although they have not received all their sample results back yet. They also indicated that Lake States Yeast had sent samples of their own wastewater to Northern Lakes Laboratory for analysis. I asked Curtis and Jody what measures they have taken to correct the situation. They indicated that in addition to no longer accepting the industrial waste, they have increased their sludge wasting rate in order to get the industrial waste out of their system as soon as possible. When asked, Curtis indicated he believed the foaming was biological in nature as opposed to chemical in nature. I suggested that that the facility inspect their

activated sludge for filamentous bacteria, which can cause foaming problems. They indicated they would do so. I told them I would call them back tomorrow afternoon (Wednesday) to follow-up.

In brief, City of Rhinelander WWTF acknowledges the foaming at their outfall and believes it is due to a waste they began receiving from Lake State Yeasts on 10/13/2023. They are no longer accepting the waste. City of Rhinelander WWTF has been sampling their effluent daily, and so far no samples have come back from the lab exceeding effluent limits, although not all samples have been analyzed by the lab yet. I do not believe a spill response is needed at this time, but I will follow-up with City of Rhinelander WWTF tomorrow afternoon to further investigate, which may include inspecting the waters downstream of the outfall for signs of dead fish.

Please let me know if you have any questions or would like to discuss further.

Thanks,

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Arthur Ryzak, P.E.
Mobile: (715) 403-2924
arthur.ryzak@wisconsin.gov

From: Antonuk, Connie J - DNR <Connie.Antonuk@wisconsin.gov>
Sent: Tuesday, October 24, 2023 1:57 PM
To: Ryzak, Arthur C - DNR <arthur.ryzak@wisconsin.gov>
Subject: FW: Rhinelander papermill Ahlstrom

Hi Arthur – I sent this to Eric D yesterday and rang him. No response. This complaint is in from a Div Adm. Can you help? Thanks much. Connie

---

From: Antonuk, Connie J - DNR
Sent: Monday, October 23, 2023 1:16 PM
To: DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>
Subject: Rhinelander papermill Ahlstrom

Hi Eric – here is the picture of their wastewater discharge pipe out into the river. Can you give the papermill a call and find out what is going on so we can respond to this complainant? He indicates that it has been white and foamy like this for 2 weeks and that it usually is not like this at all. Thanks Eric and let me know what you find out. Connie

Connie Antonuk
Field Integration Leader
Wisconsin Department of Natural Resources

107 Sutliff Avenue
Rhinelander, WI 54501
Phone: 715-401-9624
Connie.Antonuk@wisconsin.gov

dnr.wi.gov

From:	Popieluch, Andrzej W - DNR
To:	Paddock, Jeffrey J - DNR
Subject:	Ahlstrom Spill Report
Date:	Friday, October 20, 2023 8:44:22 AM
Attachments:	SpillReport.PNG PowerOutage.pdf image001.png image002.png image003.png image004.png image005.png

---

Hey Jeff,

Just wanted to follow up to see if the report they sent me is sufficient or if I should ask for more detail. I'm attaching the email Tom sent describing the event as well as the communication he received from WPS about the power outage.

Thanks,
Andrzej

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Andrzej Popieluch
Wastewater Engineer – Northern Region
Wisconsin Department of Natural Resources
107 Sutliff Ave, Rhinelander, WI 54501
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

dnr.wi.gov

From: Popieluch, Andrzej W - DNR
To: Paddock, Jeffrey J - DNR
Subject: FW: Ahlstrom (Rhinelander)
Date: Friday, October 20, 2023 1:24:47 PM
Attachments: 26b265-1 2015.pdf
Outfall012.PNG

Hi Jeff,

Forwarding Ahlstrom's response about the composition of the wastewater and outfall location. Also attaching a screenshot from the permit facts sheet that describes the outfall. Let me know if you need anything else/if the documentss provided are adequate.

Best,
Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

Andrzej

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Friday, October 20, 2023 12:52 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

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Andrzej,

Discharges 004, 011, and 012 are collocated in the tailrace of the hydroplant. See attached (26b265-1).

I was not able to get a sample during the 20 minute overflow event; air pressure was lost in the outage with the sample line isolation valves failing shut. Samples taken before the outage and after air pressure was restored, and operating data immediately preceding

and following the loss of power show the following.

Primary influent flow: 3850 gpm (flow immediately preceding power loss)
Duration of event: 20 minutes (data historian and Tom Emond observations)
Volume: 77,000 gallons (conservative estimate using 3850 gpm for the entire 20 minute event)
pH: 7.3 (WWTP influent pH immediately preceding and following overflow event)
BOD: 90 mg/L (post overflow sample – composite sample prior to overflow was 64 mg/L)
TSS: 125 mg/L (post overflow sample – composite sample prior to overflow was 226 mg/L)
Phosphorous: 0.46 mg/L (post overflow sample – phosphorous is not routine in the daily composite)
Temperature: 80 deg. F. (WWTP operator log for influent flow)

Tom

From:	Paddock, Jeffrey J - DNR
To:	Marti, Aaron M - DNR1; Polkinghorn, Michael A - DNR; Popieluch, Andrzej W - DNR
Cc:	DeVenecia, Eric R - DNR; Aartila, Tom P - DNR; Gorski, Patrick R - DNR
Subject:	RE: Foam on WI River between RHI WWTP and Hat Rapids
Date:	Thursday, October 19, 2023 7:54:00 AM
Attachments:	WI SPILL #19768 ID 20231017NO44-1 - PROCESS WATER WASTEWATER.msg image001.png image003.png

Hi Aaron,

As we discussed last night, Ahlstrom had a process water spill due to a power outage on Friday, October 13. Ahlstrom notified wastewater via e-mail late Friday afternoon and was arguing that this release did not need to be reported to the Spills Hotline because it was from a permitted outfall. Andrzej told Ahlstrom that the release should be reported to the Spills Hotline and I was notified of the spill by Andrzej on Tuesday October 17 (see attached SERTs report). I should have given you a heads up, I'll be sure to notify you of any spills to surface water in the future.

I notified Ahlstrom that this spill should have been reported to the Spills hotline immediately and will discuss potential action for failure to report a spill with my supervisor this afternoon. I'm waiting for a spill report from Ahlstrom. Wastewater may have had additional conservation with Ahlstrom and may be considering enforcement action. I'd like to discuss potential future actions with wastewater.

As we also discussed, I went to Hat Rapids last night and didn't see any foam or obvious impacts to the river upstream or downstream of the dam. I talked to two fishermen, one who had been on the river all day. They did not see any foam or obvious impacts to the river.

Thank you and let me know if you have any additional questions.

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Jeff Paddock
Phone: 715-828-8544
Jeffrey.Paddock@Wisconsin.gov

From: Marti, Aaron M - DNR1 <aaronm.marti@wisconsin.gov>
Sent: Wednesday, October 18, 2023 4:51 PM
To: Polkinghorn, Michael A - DNR <michael.polkinghorn@wisconsin.gov>; Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Cc: DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>; Aartila, Tom P - DNR <Tom.Aartila@wisconsin.gov>; Gorski, Patrick R - DNR <patrick.gorski@wisconsin.gov>
Subject: Foam on WI River between RHI WWTP and Hat Rapids
Importance: High

Greetings Mike, Andrzej and Jeff (others CC'd as FYI),

I had a local resident call me to inquire about foam on the WI River on the stretch noted above from approximately the WWTP outfall down the Hat Rapids Flowage. Have you had any recent reports from point sources (e.g. Ahlstrom, RHI City WWTP) or anything regarding spills in/upstream of this area? Please respond at your nearest convenience in case further followup action is required.

This stretch is all private with no real nearby roads, so difficult to access, but I will try to stop at Hat Rapids Dam to check out the flowage and observe if/what foam exists on my way south for a meeting tomorrow and report back if I have anything noteworthy.

From the local resident: They have waterfowl hunted this stretch for 60+ years and apparently have not observed foam like this before on this stretch. Some of it appeared to be tall and raft-like (a foot or taller in spots—but on opposite shore) and some was surface skim. This has been occurring over the last 3 days and through today. Unfortunately they do not have a camera phone or access to a camera, so no photos.

I directed the resident to the PFAS and Foam on Waterways | | Wisconsin DNR webpage and explained that it may likely be from organic matter/dissolved organic material given the time of the year, recent weekend prevailing wind direction, etc. but out of due diligence am following up with you to see if you have had any reports/inquiries.

Thanks,
Aaron

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Aaron M. Marti
Streams Biologist (Water Resources Management Specialist- Senior)
North District/ Water Quality Bureau/ Environmental Management Division
Wisconsin Department of Natural Resources
107 Sutliff Ave. Rhinelander, WI 54501
Cell Phone: (715) 891-0160
NEW Email Address (please note middle initial): AaronM.Marti@wisconsin.gov

dnr.wi.gov

From: Popieluch, Andrzej W - DNR
To: Paddock, Jeffrey J - DNR; Tom Emond
Subject: RE: Ahlstrom (Rhinelander)
Date: Wednesday, October 18, 2023 1:23:47 PM

Hi all,

I believe all the follow up requirements that the wastewater department needed have been met.

Best,

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Sent: Tuesday, October 17, 2023 9:18 AM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>; Tom Emond <Tom.Emond@ahlstrom.com>
Subject: RE: Ahlstrom (Rhinelander)

Hello Tom & Andrzej,

Discharges or releases to waters of the state via outfalls that are covered by, and in compliance with WPDES permit limitations are exempt from the spills law and spills reporting requirements. This exemption is covered under 292.11(9). However, exceedances of permit limitations may be considered a hazardous substance spill and should be reported. This includes discharges due to a mechanical failure at a treatment plant and discharges due to unscheduled bypasses. Based off the e-mail below and discussion with Andrzej, 77,000 gallons of water with concentrations that potentially exceeded the permit limitations were released as an unscheduled bypass over a 20-minute period and may have impacted surface water. Based off that information, the discharge should have been reported to the Spills Hotline immediately. We recommend erring on the side of caution, we would rather have things over reported than under reported.

I will add this to the discharge SERTs database and we will need a closure report to consider closure. Andrzej, are there any follow up requirements for wastewater?

Thank you and please let me know if you have any questions.

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Jeff Paddock
Phone: 715-828-8544
Jeffrey.Paddock@Wisconsin.gov

From: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Sent: Tuesday, October 17, 2023 7:03 AM
To: Tom Emond <Tom.Emond@ahlstrom.com>
Cc: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

Good Morning,

Tom, thanks for the follow up. To the best of my knowledge, the incident being an unscheduled bypass takes precedence over the fact that 012 is an authorized overflow discharge, hence my belief the exemption criteria in 292.11(9)(a) and (c) don't apply.

As to your second point, I believe that it is because of 292.11(9)(a) that facilities in the State don't have to report their discharges as spills everyday.

I've copied our spills coordinator Jeff Paddock on this email chain, hopefully he can help clear things up.

Best,
Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Monday, October 16, 2023 5:59 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

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Andrzej,

Just following up on our conversation.

I believe this bypass event falls under the exemption criteria in 292.11(9)(a) and (c).

012 is a permitted outfall irrespective of the characterization of an unscheduled event as a violation, and the discharge from there is included with the reporting, and associated discharge limits, for the total facility… i.e., 018 = 011 + 012 + 016 + 021. Conformance with the permit includes this outfall.

Additionally, if the criteria as presented were applied consistently, the facility would be reporting its discharge each and every operating day, irrespective of whether there was any discharge from 012.

Lastly, this type of event has not been characterized as a spill in the past.

Subsequently, I believe this is not a reportable event.

Happy to discuss directly with the Spills folks if you'd like to facilitate.

Tom

From: Tom Emond
Sent: Monday, October 16, 2023 1:24 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

Andrzej,

I have not called the spill line.

If it's a discharge covered in my permit, outfall 012, what is the regulatory obligation to do so?

Tom

From: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Sent: Monday, October 16, 2023 12:01 PM
To: Tom Emond <Tom.Emond@ahlstrom.com>
Subject: RE: Ahlstrom (Rhinelander)

***This email originated from the outside of Ahlstrom. Please, do not reply, click links or open attachments unless you recognize the sender and you are sure the content is safe ***

I appreciate the report, do you have any correspondence/information from wps regarding the weather event? Also, were you able to call the hazardous substance spills hotline (1-800-943-0003) Friday? If not, you should call it as soon as possible.

Thanks,
Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Monday, October 16, 2023 10:16 AM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

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Andrzej,

The mill experienced what WPS is characterizing as a weather related power event on Friday. With it, the lightning arresters on two of our main transformers failed. This caused a cascading failure through the mill which included the hydro turbines which normally provide emergency backup power.

With the loss of power we had no level control and no lift pumps for the effluent collection systems for a period of time. While we were proactively managing the situation and trying to restore power to critical systems, there was a period of approximately 20 minutes where we discharged from 012. I am estimating the discharge volume at 77,000 gallons.

Tom

From: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Sent: Monday, October 16, 2023 9:59 AM
To: Tom Emond <Tom.Emond@ahlstrom.com>
Subject: RE: Ahlstrom (Rhinelander)

*****This email originated from the outside of Ahlstrom. Please, do not reply, click links or open attachments unless you recognize the sender and you are sure the content is safe *****

Hi Tom,

Thanks for the heads up. Just to make sure, was the bypass to the back-up clarifier?

Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Friday, October 13, 2023 4:36 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Cc: Daniel McGreaham <daniel.mcgreaham@ahlstrom.com>
Subject: Ahlstrom (Rhinelander)

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Andrzej,

This afternoon the Rhinelander mill experienced a cascading power failure. The failure effects the entire mill.

As part of the failure we temporally lost control of the primary collection tank level and experienced approximately 20 minutes of bypass.

We currently have level control, but are having challenges in other areas. However, the mill is down and I anticipate the situation will stabilize as the millions of gallons of water in the system eventually drain down.

Please reach out if you have questions.

Tom

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This e-mail (including attachments) contains sensitive, proprietary and/or confidential information that is intended solely for the recipient. If you are not the intended recipient you are hereby notified that any use, dissemination, distribution or reproduction of this e-mail is prohibited. If you have received this e-mail in error you must delete this message. Any views expressed in this e-mail are of the sender and may not necessarily reflect the views of Ahlstrom.

From: Paddock, Jeffrey J - DNR
To: Popieluch, Andrzej W - DNR; Tom Emond
Subject: RE: Ahlstrom (Rhinelander)
Date: Tuesday, October 17, 2023 9:18:00 AM

Hello Tom & Andrzej,

Discharges or releases to waters of the state via outfalls that are covered by, and in compliance with WPDES permit limitations are exempt from the spills law and spills reporting requirements. This exemption is covered under 292.11(9). However, exceedances of permit limitations may be considered a hazardous substance spill and should be reported. This includes discharges due to a mechanical failure at a treatment plant and discharges due to unscheduled bypasses. Based off the e-mail below and discussion with Andrzej, 77,000 gallons of water with concentrations that potentially exceeded the permit limitations were released as an unscheduled bypass over a 20-minute period and may have impacted surface water. Based off that information, the discharge should have been reported to the Spills Hotline immediately. We recommend erring on the side of caution, we would rather have things over reported than under reported.

I will add this to the discharge SERTs database and we will need a closure report to consider closure. Andrzej, are there any follow up requirements for wastewater?

Thank you and please let me know if you have any questions.

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Jeff Paddock
Phone: 715-828-8544
Jeffrey.Paddock@Wisconsin.gov

From: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Sent: Tuesday, October 17, 2023 7:03 AM
To: Tom Emond <Tom.Emond@ahlstrom.com>
Cc: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

Good Morning,

Tom, thanks for the follow up. To the best of my knowledge, the incident being an unscheduled bypass takes precedence over the fact that 012 is an authorized overflow discharge, hence my belief the exemption criteria in 292.11(9)(a) and (c) don't apply.

As to your second point, I believe that it is because of 292.11(9)(a) that facilities in the State don't have to report their discharges as spills everyday.

I've copied our spills coordinator Jeff Paddock on this email chain, hopefully he can help clear things

up.

Best,
Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Monday, October 16, 2023 5:59 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

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Andrzej,

Just following up on our conversation.

I believe this bypass event falls under the exemption criteria in 292.11(9)(a) and (c).

012 is a permitted outfall irrespective of the characterization of an unscheduled event as a violation, and the discharge from there is included with the reporting, and associated discharge limits, for the total facility… i.e., 018 = 011 + 012 + 016 + 021. Conformance with the permit includes this outfall.

Additionally, if the criteria as presented were applied consistently, the facility would be reporting its discharge each and every operating day, irrespective of whether there was any discharge from 012.

Lastly, this type of event has not been characterized as a spill in the past.

Subsequently, I believe this is not a reportable event.

Happy to discuss directly with the Spills folks if you'd like to facilitate.

Tom

From: Tom Emond
Sent: Monday, October 16, 2023 1:24 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

Andrzej,

I have not called the spill line.

If it's a discharge covered in my permit, outfall 012, what is the regulatory obligation to do so?

Tom

From: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Sent: Monday, October 16, 2023 12:01 PM
To: Tom Emond <Tom.Emond@ahlstrom.com>
Subject: RE: Ahlstrom (Rhinelander)

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I appreciate the report, do you have any correspondence/information from wps regarding the weather event? Also, were you able to call the hazardous substance spills hotline (1-800-943-0003) Friday? If not, you should call it as soon as possible.

Thanks,
Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Monday, October 16, 2023 10:16 AM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Subject: RE: Ahlstrom (Rhinelander)

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Andrzej,

The mill experienced what WPS is characterizing as a weather related power event on Friday. With it, the lightning arresters on two of our main transformers failed. This caused a cascading failure through the mill which included the hydro turbines which normally provide emergency backup power.

With the loss of power we had no level control and no lift pumps for the effluent collection systems for a period of time. While we were proactively managing the situation and trying to restore power to critical systems, there was a period of approximately 20 minutes where we discharged from 012. I am estimating the discharge volume at 77,000 gallons.

Tom

From: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Sent: Monday, October 16, 2023 9:59 AM
To: Tom Emond <Tom.Emond@ahlstrom.com>
Subject: RE: Ahlstrom (Rhinelander)

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Hi Tom,

Thanks for the heads up. Just to make sure, was the bypass to the back-up clarifier?

Andrzej

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Andrzej Popieluch
Cell Phone: (715) 495-1336
andrzej.popieluch@wisconsin.gov

From: Tom Emond <Tom.Emond@ahlstrom.com>
Sent: Friday, October 13, 2023 4:36 PM
To: Popieluch, Andrzej W - DNR <andrzej.popieluch@wisconsin.gov>
Cc: Daniel McGreaham <daniel.mcgreaham@ahlstrom.com>
Subject: Ahlstrom (Rhinelander)

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Andrzej,

This afternoon the Rhinelander mill experienced a cascading power failure. The failure effects the entire mill.

As part of the failure we temporally lost control of the primary collection tank level and experienced approximately 20 minutes of bypass.

We currently have level control, but are having challenges in other areas. However, the mill is down and I anticipate the situation will stabilize as the millions of gallons of water in the system eventually drain down.

Please reach out if you have questions.

Tom

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