



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Putnam County  
IAMS Company  
Pretreatment

March 31, 2009

Mr. Mike George  
Health Safety and Environmental Program Leader  
IAMS Pet Food Manufacturing  
P. O. Box 87  
3700 State Route 65  
Leipsic, Ohio 45856-0087

Dear Mr. George:

On February 10, 2009, an inspection was conducted of the pretreatment system serving IAMS Company in Leipsic. Dana Martin Hayden, Michael Selyak and I represented the Ohio EPA. You and Rob Niese were present and provided operation and maintenance information regarding industrial wastewater pretreatment discharges to the Village of Leipsic sanitary sewer system. Our inspection included a tour of the facility and completion of the enclosed inspection form.

The Village of Leipsic is continuing to collect and analyze process wastewater samples taken at the pump station on IAMS's property. The pump station has a flow meter and lighted alarm system, which is visible and inspected by IAMS staff. All repairs and spare parts for the pump station are maintained by the Village of Leipsic at this time.

As part of this inspection, we also inspected the Sequencing Batch Reactor (SBR) treatment unit at the Village of Leipsic's Wastewater Treatment Plant. During our inspection there was grease observed on the SBR's surface during the settling cycle. Review of your Discharge Monitoring reports from May 2007, to February 2009, indicate that your average oil and grease discharge was 463 mg/L. There is concern that you are contributing a significant amount of oil and grease to the Village of Leipsic. It is recommended that the depth of grease and fat in the grease interceptor be monitored frequently. A depth, protective of the sewer system, should be established for when the tank needs to be pumped. Further pretreatment may be necessary to reduce the amount of fat and grease leaving the facility.

IAMS had two limit violations for pH greater than 9.0 since the last inspection. The cleaner that is used for the clean in place equipment has a high pH of 13.9 at 100% concentration and 12.3 at 1%. IAMS is continuing to monitor the pH. The chemical supplier Ecolab tested the dispersal system to ensure that the cleaning chemicals are being applied at the appropriate concentration. At this time, IAMS does not have a means to adjust the pH prior to discharge.

Mr. Mike George  
March 31, 2009  
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IAMS has requested that the PH limit in their indirect discharge permit be adjusted to a higher maximum limit. Since we have documented issues at the Village of Leipsic WWTP regarding oil and grease, we are not comfortable raising the pH limit unless it can be demonstrated that the higher pH does not increase the concentration of oil and grease discharged to the Leipsic WWTP.

Your draft Indirect Discharge Permit (IDP) renewal will have a compliance schedule that requires the installation of a continuous pH monitor. If you are unable to meet the effluent limit you will need to submit a permit to install (PTI) for a pH adjustment system.

It was recommended during the inspection that a sign be placed at the drain in the caramel room. The sign should state that the reason for the plug in the drain is spill containment and the plug should not be removed.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please call me at (419) 373-3053 or Dana Martin Hayden at (419) 373-3067

Sincerely,



Ryan Gierhart  
Division of Surface Water

//lr

Enclosure

pc w/enclosure: Jim Russell, Village of Leipsic,  
Ryan Laake, DSW, CO  
DSW-NWDO FILE



# PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME <i>The Iams Company</i>	PERMIT NUMBER <i>2DP00057</i>	FACILITY NUMBER <i>OHP000190</i>	
INSPECTION TYPE <i>IU-IDP</i>	INSPECTOR <i>Ryan Gierhart Dana Martin-Hayden</i>	FACILITY TYPE <i>Significant Industrial User</i>	DATE CONDUCTED <i>2/10/2009</i>

<b>GENERAL INFORMATION</b>
NAME AND LOCATION OF FACILITY <i>The Iams Company, 3700 State Route 65, Leipsic, Ohio 45856</i>
MAILING ADDRESS OF FACILITY <i>The Iams Company, 3700 State Route 65, Leipsic, Ohio 45856</i>
CONTACT (NAME/TITLE/PHONE) <i>Mike George/HS&amp;E Program Leader/419-943-4253</i>

<b>FACILITY EVALUATION</b>				
(S = Satisfactory, M = Marginal, U = Unsatisfactory)				
		Pretreatment		
	U	Have not been adequately monitoring PH or waste water generated onsite.		
* See inspection letter				

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
Ryan Gierhart	Ohio EPA, NWDO, 419-373-3053	March 10, 2009
Dana Martin-Hayden	Ohio EPA, NWDO, 419-373-3067	March 10, 2009
Signature of Reviewer		Date

## INDUSTRIAL USER INSPECTION CHECKLIST

Facility: The Iams Company  
OH Number: OHP000190  
Facility Representative:  
Mike George

Date of inspection: 2-9-2009  
IDP Number: 2DP00057\*AP  
Inspector(s): Dana Martin-Hayden, Ryan Gierhart,

### COMPLIANCE

- |    |   |         |
|----|---|---------|
| 1. | Date of last pretreatment inspection:   | 5/17/07 |
| 2. | Has the facility been in compliance with its permit limits since the last inspection?<br>If no, explain: PH > 9.0 on 11/15/2007 and 2/14/2008 PH < 6.0 on 4/13/2008 | N       |
| 3. | Is the facility in compliance with all other requirements?  | Y       |
|    | Sampling procedures   | Y       |
|    | Reporting (late reporting, failure to report, etc)  | N       |
|    | Compliance schedules  | NA      |
|    | Submitted BMR and 90 day compliance reports   | Y       |
|    | Any other requirements  | NA      |
|    | If any of the above five answers is no, explain:<br>Several failure to report violations from January to June of 2008   |         |
| 4. | Was the facility required to perform any actions as a result of the last inspection?<br>Explain any unresolved actions:   | N       |

### FACILITY OPERATIONAL CHARACTERISTICS

- |     |   |   |    |                               |  |
|-----|---|---|----|-------------------------------|--|
| 5.  | Number of Employees: 157  |   | 6. | Shifts/Day: 2/7               |  |
| 7.  | Production Days/Year: 345   |   | 8. | Hours/shift: 12.5 Hour shifts |  |
| 9.  | Any production changes since the last inspection?<br>If yes, explain: Volume has increased                    | Y |    |                               |  |
| 10. | General facility description and operations: Manufacture Pet Food   |   |    |                               |  |
| 11. | Any change in materials used in production since the last inspection?<br>If yes, explain: Added caramel color | Y |    |                               |  |
| 12. | Any expansion or production increase expected within the next year?<br>If yes, explain:                       | N |    |                               |  |

## WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

14. Was a PTI issued for the treatment system? Y

15. Were there any modifications to the treatment system since the previous inspection? N

If yes, was a PTI obtained? N

PTI Number:

Date:

16. What is the treatment mode of operation? Continuous

If batch, list the frequency and duration: They clean each line on an alternating schedule which produces flow to the grease interceptor on a daily basis. The facility is not monitoring the variance in pH between different cleaners nor pH adjusting. The facility does not know what wastewater pH values tend to be associated with each cleaner.

17. Who is responsible for operating the treatment system?

P & G utilities and Facilities Dept. inspects the oil/water separator and Roberts Sewer pumps out as needed usually every week.

18. How often is the treatment system checked?

The oil/water separator is checked weekly and the alarm light on the pump station is visible to environmental and plant staff, checked by environmental staff daily.

19. Is there an alarm system for the system? Y

Explain: The pump station has an alarm light for notification of water level or pump problems. During the weekly environmental audit they check for evidence of grease interceptor backups.

20. Is there an operations and maintenance manual? N

21. Is an inventory of critical spare parts maintained? N

If yes, list: (The village maintains the pump station)

22. Are there any bypasses in the system? N

If yes, describe the location:

Have bypasses occurred since the last inspection? N

Was the POTW notified? N

**WASTEWATER TREATMENT CONTINUED**

23. Are residuals or sludges generated?

Y

Method of disposal: The grease which is collected in the grease interceptor is hauled to the Village of Leipsic weekly by Roberts Sewer Service.

Frequency and amount of disposal: Weekly ~1000 – 1500 gallons

Name of hauler/landfill/disposal facility: Roberts Sewer Service

Is any sludge generated subject to RCRA regulations?

N

If land applying sludge, is there a sludge management plan?

N

**PROCESS AND WASTEWATER INFORMATION**

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Process Wastewater	Pump Station	59,720			
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
<b>Total Regulated Process Flow</b>		59,720			
Non-contact Cooling					
Blowdown					
Reverse Osmosis Condensate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
<b>TOTAL FLOW</b>					

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

**SELF MONITORING**

26. Sample location(s) described in the facility's permit: 001 located at the pump station on SR 65 near the railroad tracks

27. Is the facility sampling at the location(s) described in the permit? Y  
If no, describe the actual location: Yes, however the village of Leipsic does the sampling

28. Is the location(s) where the facility is sampling representative? Y  
If no, indicate a representative location:

29. Is the flow measured or estimated? Measured  
If measured, how often is the meter calibrated? once per year

If estimated, describe method of estimation:

30. Is pH monitored continuously? N  
If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? N  
If no, specify the sample collector:

32. Are appropriate sampling procedures followed? Y  
Monitoring frequencies Y  
Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium) Y  
Flow proportioned samples Y  
Proper preservation techniques Y  
Sample holding times Y  
Chain-of-custody forms Y

33. Are samples analyzed in accordance with 40 CFR 136? Y

34. Laboratory conducting analyses: Village of Leipsic WWTP

**TOXICS MANAGEMENT**

35. Are any listed toxic organics used in the facility? N  
If yes, identify organics:
36. Does the facility have a current toxic organic management plan(TOMP)? N  
If yes, is it being implemented? N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: N
38. Does the facility need a spill prevention plan or slug discharge control plan? N  
If yes, does the facility have a written plan? N
39. Identify any potential slug load or spill areas: The plant has 4 12,000 gallon tanks of fat, 10 55 gallon drums of basic cleanser with high PH., and 12,000 gallon digest tanks of his with PH at 2.5 – 3.0. The storage room has spill containment and the valve leaving the containment area is shut off to prevent discharges to the grease interceptor. Weekly they check to make sure the valve is shut off. Maintenance has the key to open it should an emergency occur. A new room has been added on that houses the 10,000 gallons of caramel coloring and oil the room has spill containment with a valve shutoff to the drain.

**REQUIRED FOLLOW-UP ACTIONS**