



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 5, 2011

RE: PBM Covington, LLC
Pretreatment Compliance Inspection

Mr. Kent Mowry
PBM Covington
400 Hazel Street
Covington, OH 45318

Dear Mr. Mowry:

On March 21st I met with you and Mr. Eric Matovich to conduct a wastewater pretreatment inspection and to discuss PBM's plans to expand and improve its pretreatment system to accommodate increased production expected this summer. You showed me the plans for the expansion and improvements which call for a second DAF unit that will mirror the existing unit along with new suction lift pumps to replace the submersible pumps in the influent sump. You indicated that this installation is expected to occur during the plant shut down scheduled for May 9th through June 9th. Please work to submit a Permit to Install (PTI) application for this project as soon as possible. Along with the PTI application, it is necessary to submit an application for a Indirect Discharge Permit modification. Based on the increased flow and load to the Village of Covington's WWTP, I anticipate an increase in your self-monitoring frequencies.

Findings from my inspection are as follows:

Log Book

Please ensure that the temperature of the sampler refrigerator is recorded at least at the beginning and end of a compliance sampling event. If the refrigerator's integral thermometer is accurate to 0.5° Celsius (don't rely on the numerical display – go to the technical specifications), it needs to be checked against an NIST-traceable thermometer at least annually. If it is not sufficiently accurate, then the stick thermometer you have inside the refrigerator needs to be checked annually against an NIST-traceable thermometer. This check, along with any compensation value, needs to be recorded in the log book and the correction value needs to be posted with the thermometer reading. If you don't have an NIST-traceable thermometer on-site, you may want to check with the village to see if they have one you could use.

The thermometer log book is also where calibrations of the pH meter are recorded. Please note that only the calibration activity itself needs to be recorded and not pH readings prior to calibration that indicate how much drift occurred since the meter was last used.



Non-Compliance Notification

A review of your monitoring results since my previous inspection revealed an Oil and Grease violation of 272 mg/l on May 21, 2010 (permit limit is 100 mg/l). Although you did not provide notification to this office as required by Part III, Item 3.E of your Indirect Discharge Permit effective at that time, subsequent monitoring on June 24, 2010 revealed compliance with a result of 41.78 mg/l. Please be aware of the notification requirement now in Part III, Item 3.H of your current permit should there be future violations of your daily maximum limits.

Flow-Proportional Sampling

Although the flow meter in the manhole is functional and is used to report process wastewater discharge flow, it is my understanding that sample collection is time-proportional with the automatic composite sampler being activated when the DAF feed pump is activated. Because flows through two DAF units may not always be equal, I believe PBM will need to plan to start collecting composite samples from the discharge manhole and make sure the composite sampler is programmed to collect flow-proportional samples based on the flow meter reading. This will need to be addressed as soon as possible.

Grab Samples

Oil & Grease samples are currently collected at the effluent weir of the DAF unit as a matter of convenience in filling the jar. With two DAF units possibly contributing unequal flow rates, I believe grab samples will need to be collected at the discharge manhole. This will necessitate establishing a collection technique that allows the discharge to be collected directly into the sample jar subsequently used during sample preparation and analysis.

It is fortunate that a secure sampling location with an accurate flow measuring device is available and I believe it will be important to utilize its full functions. Please let me know if you identify any issues with its use for sampling performed after the plant shut down period.

Please provide a written response to this letter by May 2nd addressing the items I've presented. If you have any questions concerning this letter or the attached inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ATTACHMENT

CC: Ray Kimmel – Village of Covington
Ryan Laake – Ohio EPA / Central Office / DSW





PRETREATMENT INSPECTION REPORT

Southwest District Office

PERMIT NUMBER
1DP00011*DP

FACILITY NUMBER
OHP000090

DATE CONDUCTED
March 21, 2011

INSPECTION TYPE
I

INSPECTOR
S

FACILITY TYPE
2

TIME IN
1145

TIME OUT
1300

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY

**PBM Covington, LLC
400 Hazel Street
Covington, OH 45318**

POTW RECEIVING DISCHARGE

Village of Covington WWTP

MAILING ADDRESS OF FACILITY

**PBM Covington, LLC
400 Hazel Street
Covington, OH 45318**

CONTACT (NAME/TITLE/PHONE/E-MAIL)

**Kent Mowry - Maintenance Manager & Safety Coordinator
(937) 473-2050 / kmowry@pbmnutritionals.com**

FACILITY EVALUATION (See Inspection letter for a more complete description of findings)

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable)

S	Sampling Procedures	NA	Compliance schedule requirements
S	Reporting	M	Notification
S	Compliance with effluent limits		Other

Name and Signature of Inspector(s)

Matt Walbridge

Agency / Office / Telephone

Ohio EPA / Southwest District Office / (937) 285-6095

Date

4-5-11

Signature of Reviewer

Ohio EPA / Southwest District Office / (937) 285-6034

Date

4/6/11



INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **PBM Covington, LLC**

Date of inspection: **March 21, 2011**

OH Number of receiving POTW: **OH0020761**

IDP Number: **1DP00011*DP**

Facility Representative: **Kent Mowry and Eric Matovich**

Inspector(s): **Matt Walbridge**

COMPLIANCE

1. Date of last pretreatment inspection: **April 22, 2010**

2. Has the facility been in compliance with its permit limits since the last inspection? Y / N
If no, explain:

Oil and grease violation on May 21, 2010 (272 mg/l reported versus the limit of 100 mg/l)

3. Is the facility in compliance with all other requirements?
Sampling procedures Y / N / NA
Reporting (late reporting, failure to report, etc) Y / N / NA
Compliance schedules Y / N / NA
Submitted BMR and 90 day compliance reports Y / N / NA
Any other requirements Y / N / NA

If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? Y / N
Explain any unresolved actions:

None.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~50**
6. Shifts/Day: **2 (14 on day shift, ~7 on third shift in production)**
7. Production Days/Year: **~260 (5-day work weeks)**
8. Hours/shift: **12**

9. Any production changes since the last inspection? Y / N
If yes, explain:

The facility is operating below capacity (approx. 40%)

10. General facility description and operations:

Processes include mixing (formulation), homogenization, pasteurization and spray drying of finished infant formula.

Production operations are five days/week but wastewater processing occurs over seven days.

Coagulant and flocculant feed rates are different depending on presence of normal or CIP wastewater.



WASTEWATER TREATMENT (CONTINUED

19. Is there an alarm system for the system? Y / ~~N~~
Explain:

There is an alarm that is activated if the flow rate is exceeded and there are many level alarms (such as pH) on the pretreatment system.
20. Is there an operations and maintenance manual? Y / ~~N~~
21. Is an inventory of critical spare parts maintained? Y / ~~N~~
If yes, list:

Spare pumps for EQ and DAF units, injection pumps, and air filter for air mixer blowers
22. Are there any bypasses in the system? Y / ~~N~~
If yes, describe the location:

All process waste waters only go to the treatment system. Floor drains in the treatment building all drain to the sump that feeds the treatment system.
- Have bypasses occurred since the last inspection? N.A. Y / ~~N~~
- Was the POTW notified? N.A. Y / ~~N~~
23. Are residuals or sludges generated? Y / ~~N~~
Method of disposal:

Hauled to lagoon treatment system operated by Mike's Sanitation. Hauling occurs on Fridays.
- Frequency and amount of disposal:

The treatment system generates approximately 2,500 gallons of wastewater at 3 to 5 % solids every week.
- Name of hauler/landfill/disposal facility:

Mike's Sanitation
- Is any sludge generated subject to RCRA regulations? Y / ~~N~~
- If land applying sludge, is there a sludge management plan? N.A. Y / ~~N~~



SELF MONITORING

26. Sample location(s) described in the facility's permit:

"The sampling point shall be the effluent from the dissolved air flotation (DAF) system either at the flow monitoring manhole located just outside the pretreatment building or the overflow weir of the DAF. Samples for Oil and Grease (reporting code 00050) should be collected at the overflow weir of the DAF unit."

27. Is the facility sampling at the location(s) described in the permit? Y / ~~N~~
If no, describe the actual location:

At the request of the Village of Covington, the sampler collects from the DAF overflow trough.

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

29. Is the flow measured or estimated? Measured / Estimated

They now use the discharge flow meter (flume) as the basis of reporting discharge flow. They used to use the DAF flow meter.

If measured, how often is the meter calibrated?

Calibrated by 'Master Leo' (a contracted firm).

If estimated, describe method of estimation:

30. Is pH monitored continuously? ~~Y~~ / N

However, there is a pH meter on the DAF feed tank that is controlled to 8.5 to 9.0

If yes, how often is the meter calibrated?

Prior to analysis. The meter appears to drift quite a bit between calibrations.

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

PBM delivers samples to Brookside Laboratories. pH is field-measured by PBM.

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

**** Sample collection is time-proportional (once every 20 minutes) but the sampler is only activated when the DAF feed pump is activated. This effectively results in flow-proportional samples since the flow rate is fairly constant when the DAF is operating.***

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

34. Laboratory conducting analyses: ***Brookside Laboratories out of New Knoxville***

