



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

February 11, 2008

RE: Pretreatment Compliance Inspection and  
Notice of Violation / Significant Non-Compliance

Mr. Doug Duerr  
Agrana Fruits US, Inc.  
P.O. Box 459  
Botkins, OH 45306-0459

Dear Doug:

Back on November 28, 2007 I met with you to conduct a pretreatment compliance inspection of your facility. I apologize for the very long delay in providing you this response.

A review of your self-monitoring reports since my previous inspection on February 24, 2005 revealed violations for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Flow Rate (GPM) and Total Flow (GPD). I've presented these violations in the attached table. Agrana also failed to report monitoring for the month of June 2007 that was required to be included with the report due December 15, 2007. You indicated that monitoring was conducted and that you would submit a report soon to include the missing monitoring results. It would be acceptable for you to report only the missing data on a new reporting form. Please send me a copy of the report.

Agrana met both the chronic and technical review criteria for significant non-compliance (SNC) for TSS during the six-month period of December 2005 through May 2006. Although not meeting the SNC criteria, 48% of the reported BOD results also exceeded the discharge limits. Except for one occasion associated with an operational mishap, the installation of the expanded and upgraded pretreatment system has vastly improved the effluent quality beginning in August 2006. Since the installation of this system has always been viewed as the necessary solution to your facility's high-strength wastewater, it is not necessary for you to address these past violations.

From the time that your current Indirect Discharge Permit became effective on December 1, 2007, you have reported both flow rates and volumes in violation of the permit conditions of 125 gallons per minute and 165,000 gallons per day. Although the one reported exceedence of the daily volume was very small, it is necessary for you to work to keep your discharge below 165,000 gpd. Contrary to this minor exceedence, every reported maximum flow rate (gpm) has exceeded the limit. Since you are required to monitor flow rate continuously and report the maximum weekly value, I need you to indicate how often and for how long discharge flow rates exceed 125 gpm. If the maximum flow rate occurs for very short durations, it may be necessary to modify the monitoring requirements or, alternately, establish an allowable amount of time that flow can be in excess of 125 gpm without triggering the requirements in Part II D of your permit. Please provide me your perspective on this issue so that we can address any necessary permit changes quickly.

Mr. Doug Duerr  
February 11, 2008  
Page 2

Agrana's manufacturing operations and products are essentially unchanged since my previous inspection. CIP operations are now automated which would seem allow for a high level of control over this source of wastewater. Out at the treatment lagoon, you informed me that you now add phosphoric acid from a 300-gallon tote to provide a source of phosphorous which is a necessary nutrient for the microbes in the treatment lagoon. The DAF treatment system appeared to be running very well. You showed me some improvements you have made in the way polymer is fed to the waste stream prior to the DAF and to the air induction system of the DAF to enhance its performance. The belt filter press continues to dewater the DAF solids very well. Solids are no longer being hauled to a sanitary landfill and are instead being sent to a permitted composting facility in Mercer County.

Finally, I strongly encourage you to consider subscribing to Ohio EPA's new e-DMR reporting system. It is replacing the current SWIMware system and it is proving to be very popular and successful. One of the many benefits is that there is no software involved on your end. You just log onto our web site using your internet service provider, pull up your report and enter monitoring data. If you get called away or aren't ready to submit the report, you can save it and when you log back in at another time you pick up where you left off. Please check out our website to learn more and get registered to participate. The address is: <http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

I appreciate the effort you have made to establish a very well-run pretreatment system. If you have any questions concerning this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,



**Matt Walbridge**  
Pretreatment Coordinator  
Division of Surface Water

ENCLOSURE

CC: Michael VanBrocklin - Village of Botkins (w/o attachments)  
Julia Zhang, PE - Ohio EPA / Central Office / DSW

**Agrana Fruits US, Inc.**  
**Reported Self-Monitoring Violations**  
**January 2005 through December 2007**

Date	<i>Reported TSS Values Exceeding 300 mg/l Limit Effective through 11-30-07</i>	<i>Reported BOD Values Exceeding 300 mg/l Limit Effective through 11-30-07</i>	<i>Reported Exceedences of 165,000 gpd Flow Limit Effective 12-1-07</i>	<i>Reported Exceedences of 125 gpm Flow Limit Effective 12-1-07</i>
2005	March 3	320		
	March 22	380		
	March 31	380		
	April 6	433		
	April 12	650		
	April 19	683		
	April 27	1250		
	May 10	1000		
	August 10	830		
	August 18	560		
	October 25	1200		
	November 10	1540		
	November 15	733.3		
	November 26	1020		
	November 29	1040		
December 13	530			
December 20	2860	352		
December 29	540			
2006	January 3	440	370	
	January 13	500		
	January 17	567		
	January 24	750	335	
	January 31	1260	792	
	February 7	600	340	
	February 14	440	681	
	February 21	700		
	February 28	333	805	
	March 10	2620	864	
	March 14	4800		
	March 28	2640	417	
	April 4	3120	415	
	April 11	1840	394	
	April 18	2180	383	
	May 9	2540		
	May 23	720		
	May 31	1820		
	June 6	1600		
	June 15	422		
	July 6	2280		
	July 11	1360		
	July 18	740		
September 21	1350			
October 3	342			
2007	January 31	364		
	March 20	410		
	December 4			145
	December 11			143
	December 18			143
December 27			132	
			165,918	



Ohio Environmental Protection Agency

# PRETREATMENT INSPECTION REPORT

PERMIT NUMBER <b>1DP00022*CP</b>	FACILITY NUMBER <b>OHP000126</b>	DATE CONDUCTED <b>November 28, 2007</b>
INSPECTION TYPE <b>I</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>2</b>
		TIME IN <b>0900</b>
		TIME OUT <b>1145</b>

## GENERAL INFORMATION

NAME AND LOCATION OF FACILITY <b>Agrana Fruit US, Inc. 16197 North County Road 25-A Botkins, OH 45306</b>	POTW RECEIVING DISCHARGE <b>Village of Botkins WWTP</b>
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MAILING ADDRESS OF FACILITY <b>Agrana Fruit US, Inc. P.O. Box 459 Botkins, OH 45306</b>
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CONTACT (NAME/TITLE/PHONE) <b>Mr. Doug Duerr / Regulatory Coordinator / (937) 693-3821</b>
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## FACILITY EVALUATION (See Inspection letter for more complete description)

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

<b>S</b>	Sampling Procedures	<b>NA</b>	Compliance schedule requirements
<b>U</b>	Reporting ( <i>failure to report June 2007 monitoring</i> )	<b>S</b>	Notification
<b>*</b>	Compliance with effluent limits	<b>-</b>	Other -

**\* Compliance was unsatisfactory up until August 200, marginal from that time until April 2007, satisfactory from that time until December 2007 and marginal up to the time of this evaluation.**

Name and Signature of Inspector(s)  <b>Matt Walbridge</b>	Agency / Office / Telephone <b>Ohio EPA / Southwest District Office / (937) 285-6095</b>	Date <b>2-11-08</b>
Signature of Reviewer  <b>G. S. ...</b>	Agency / Office / Telephone <b>Ohio EPA / Southwest District Office / (937) 285-6034</b>	Date <b>2/11/08</b>

## INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Agrana Fruits US, Inc.**

Date of inspection: **November 28, 2007**

Facility Number: **OHP000126**

IDP Number: **1DP00022\*CP**

Facility Representative: **Doug Duerr**

Inspector(s): **Matt Walbridge**

### COMPLIANCE

1. Date of last pretreatment inspection: **February 24, 2005**
2. Has the facility been in compliance with its permit limits since the last inspection? Y/N  
If no, explain:

**Numerous violations of daily concentration limits for TSS and BOD  
– see tabulation in inspection letter.**

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:

**The next self-monitoring report will be due on January 20<sup>th</sup> instead of December 15<sup>th</sup> so they will need to include 7 months of data instead of six.**

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

**They were required to submit a PTI for proposed pretreatment improvements. They complied.**

### FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~160**
6. Shifts/Day: **3**  
*(sanitation shifts depend on equipment run times)*
7. Production Days/Year: **~252**  
*(5-day work weeks)*
8. Hours/shift: **8**

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

**Installed a hot water loop to all lines.  
CIP equipment upgrade on double batch lines. Equipment is now dedicated to these lines.  
Automation installed on production (agitation specs., cook temps, times, etc.)**

10. General facility description and operations:

**Fruit preparations for use in the dairy industry. Sole supplier to Dannon Yogurt.**

**Frozen Fruit → Thaw → Portioning → Cooker → Cool → Packaging → Cool → Ship**

↑  
starch, sweeteners, flavor, etc.

↑  
mostly totes (~99%)

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/~~Y~~/N

If yes, explain:

*(Basic ingredients include fruit, starch, pectin, sweeteners and flavorings)*

12. Any expansion or production increase expected within the next year? Y/~~Y~~/N

If yes, explain:

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WASTEWATER TREATMENT

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

*Please see attached diagram.*

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

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

*New Biolac aeration system in treatment lagoon, new DAF system (including sludge belt filter press) and a new pretreatment building. (There are (4) 25-HP gun-type aerators and (2) 25 HP donut-type aerators on-site, but they are not hooked up.)*

*Micro-nutrients are no longer being added. In addition to the ~100 gpd of ammonia being added, approximately 10 gpd of phosphoric acid is being added to the treatment lagoon as a source of P.*

If yes, was a PTI obtained? Y/~~Y~~/N

PTI Number: 05-13851 (subsurface aeration and DAF system) Date: 8-4-05

PTI Number: 05-14293 (modification of 05-13851) Date: 1-06

16. What is the treatment mode of operation? Batch/~~Batch~~/Continuous/~~Continuous~~/Combination

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

*Doug Duerr is the supervisor. The treatment lagoon operates 24/7. The DAF/belt filter press system is operated Monday through Friday. Tim Wombold operates the DAF/belt filter press during 1<sup>st</sup> shift and it is his primary responsibility. Other staff in the maintenance department operate the system during 2<sup>nd</sup> and 3<sup>rd</sup> shifts.*

18. How often is the treatment system checked?

*Throughout the day.*

*Operational targets are ~1,500 to 2,000 MLSS which is checked weekly. An Imhoff cone is used daily to check for settlability.*

*The dissolved oxygen of the large lagoon is checked at the surface and the bank in the spring to determine the need to turn on the aerators.*

**WASTEWATER TREATMENT CONTINUED**

19. Is there an alarm system for the system? Y/N  
 Explain:  
*There is an autopager for the aeration power system and a high and low-level alarm on the lift station. There is also a relay to shut off discharge pump if daily flow exceeds permitted flow at the DAF and at the monitoring location.*  
  
*There are set points for flow for the DAF influent and effluent. There are set points for pH on the effluent from the DAF. There is also an alarm for diversion of flow to the treatment lagoon.*
20. Is there an operations and maintenance manual? Y/N  
*The equipment maintenance manuals have been inserted into the preventive maintenance scheduler. The maintenance manual was generated in-house*
21. Is an inventory of critical spare parts maintained? Y/N  
 If yes, list:  
*They have an automated inventory management system (keeps track of when inventory is tapped and notifies when its time to order new parts).*  
  
*Belts and oil for the blowers.*  
*Actuator and cylinders for belt filter press, extra belt for press, rebuild kits for pumps.*  
*Motors for pumps can be fixed in a few days.*
22. Are there any bypasses diversions in the system? Y/N  
 If yes, describe the location:  
  
 Have bypasses diversions occurred since the last inspection? Y/N  
  
 Was the POTW notified? Y/N
23. Are residuals or sludges generated? Y/N  
  
 Method of disposal: *Sludge from DAF filter press goes into a trailer and then is hauled to Wennings (located in Mercer County) for composting.*  
  
*Residues from the micro screen, from C.I.P. and tote washing and any off-spec materials are collected in a tanker kept on-site. Agrana pays hog farmers to come and pick it up for use as animal feed.*  
  
 Frequency and amount of disposal:  
  
*-5,000 gallons of residues from the micro screen, C.I.P., tote washing and any off-spec materials are generated from weekly to monthly (depends on how much off-spec material is generated).*  
  
*20 to 25 tons of DAF solids (pressed) are generated twice a week.*  
  
 Name of hauler/landfill/disposal facility:  
  
*Jay Holman out of the Maria Stein area (hog farmer) takes the residues - Ringler Feeds is a back-up taker. Wennings takes the DAF solids - believe they're land applying the sludge after composting.*
- Is any sludge generated subject to RCRA regulations? Y/N
- If land applying sludge, is there a sludge management plan? N.A. Y/N  
*Composting facilities are not covered by surface water rules*

**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. Clean in place (C.I. P.)	N.A.	-	Not determined	N.A.	N.A.
2. Tote Washing	N.A.	-	Not determined	N.A.	N.A.
3. Floor Wash Downs	N.A.	-	Not determined	N.A.	N.A.
<i>(These 3 are in order of water usage)</i>					
4.					
5.					
<b>Total Regulated Process Flow</b>	<i>Monitoring Station</i>	165,000	165,000		
Noncontact Cooling	-	-	-		
Boiler Condensate	(3)	-	-		
Reverse Osmosis	(3)	-	-		
Demineralizer Regeneration	-	-	-		
Softener Backwash	-	-	-		
Filter Backwash	-	-	-		
Compressor Condensate	-	-	-		
Storm water	-	-	-		
<b>Total of Dilute Flows</b>	N.A.	N.A.	N.A.		
Unregulated Flows	N.A.	-	-		
Sanitary	N.A.	N.A. (3)	N.A. (3)		
<b>TOTAL FLOW</b>	(1)	N.A.	~165,000		

(1) Can be higher if O.K. 'd by Village of Botkins and Ohio EPA.

(2) This is the approximate flow generated during production days based on self-monitoring reports.

(3) Only process wastewater is present at sampling point. Other wastewaters are discharged to sewer via a separate line.

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

*(Storm water runoff is discharged to the roadside ditch in front of the facility)*

**SELF MONITORING**

26. Sample location(s) described in the facility's permit:  
*"Flow-proportional samples shall be collected from the wastewater treatment system flow monitoring station."*
27. Is the facility sampling at the location(s) described in the permit? Y / N  
 If no, describe the actual location:
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  
 If measured, how often is the meter calibrated?  
*ISCO came out to the facility in 2007 to calibrate the meter. They moved the bubbler.*  
*On a daily basis they look to see if the meter reads zero when there is no flow.*  
 If estimated, describe method of estimation:
30. Is pH monitored continuously? *(The lowest recorded value is reported)* Y / N  
 If yes, how often is the meter calibrated?  
*Every 3 to 4 months - it's part of the preventative maintenance program.*
31. Does the facility collect its own samples? Y / N  
 If no, specify the sample collector:  
*Doug sets up the automatic sampler to collect the sample. Mr. Swank picks up the sample and takes it to the lab.*  
*The autosampler collects a sample every day. Personnel from the Village of Botkins empty the sample jug every day after they pick up their sample.*  
*Agrana collects their weekly sample on Tuesdays*
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 (~750 ml aliquot collected every 5,000 gallons) Y / N  
 Proper preservation techniques Y / N  
 Sample holding times Y / N  
 Chain-of-custody forms Y / N
33. Are samples analyzed in accordance with 40 CFR 136? Y / N
34. Laboratory conducting analyses:  
*Brookside (Chain of Custody sheets are returned with analytical results)*

## TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y/N  
If yes, identify organics:
36. Does the facility have a current toxic organic management plan(TOMP)? Y/N  
If yes, is it being implemented? NA Y/N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y/N
38. Does the facility need a spill prevention plan or slug discharge control plan? Y/N  
If yes, does the facility have a written plan? NA Y/N
39. Identify any potential slug load or spill areas:

*There are two 300-gallon totes of aqua ammonia and one 300-gallon tote of phosphoric acid that are used to feed nutrients to the treatment lagoon. Chemical is fed using a small feed pump. The slug load potential from an upset of the treatment system is considered very low.*

## REQUIRED FOLLOW-UP ACTIONS

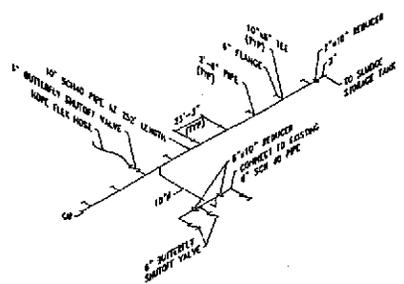
*See inspection letter.*

## OBSERVATIONS

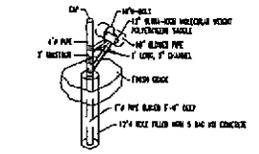
*Nitric acid-based cleaner used for CIPs is pumped to CIP cleaning tank.*

*A lot of the sterilization of the cookers and mixers is done with steam instead of chemicals.*

*Floor cleaning is done with chlorine-based cleaner (200 ppm Cl).*



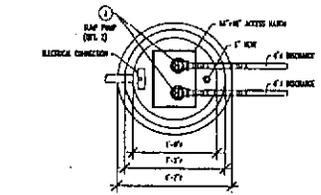
**BLOWER SYSTEM SCHEMATIC**  
 NO SCALE



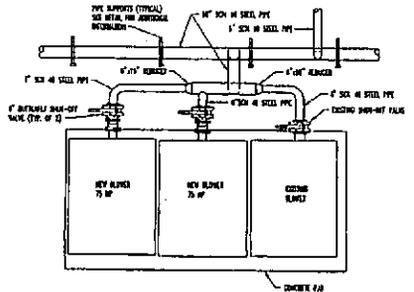
**BLOWER PIPE SUPPORT**  
 NO SCALE

- SUMP PUMP GENERAL NOTES**
1. ALL FIXTURES AND ACCESSORIES TO BE SHOWN ON THIS PLAN.
  2. MECHANICAL SHALL COMPLY TO AISC REQUIREMENT 5-104 - PULSED, IMPERFORATED, CONCRETE SECTION.
  3. DIMS TO CENTER UNLESS OTHERWISE NOTED.
  4. PIPE TO BE SCHEDULE 40 UNLESS OTHERWISE NOTED. USE WELDED OR FRAMING FULL LENGTH AS REQUIRED.
  5. CONCRETE SHALL BE 3000 PSI 40 CYLINDRICAL.
  6. FIELD JOINT FLANGE BEHIND IS REQUIRED FOR PROPER OPERATION.

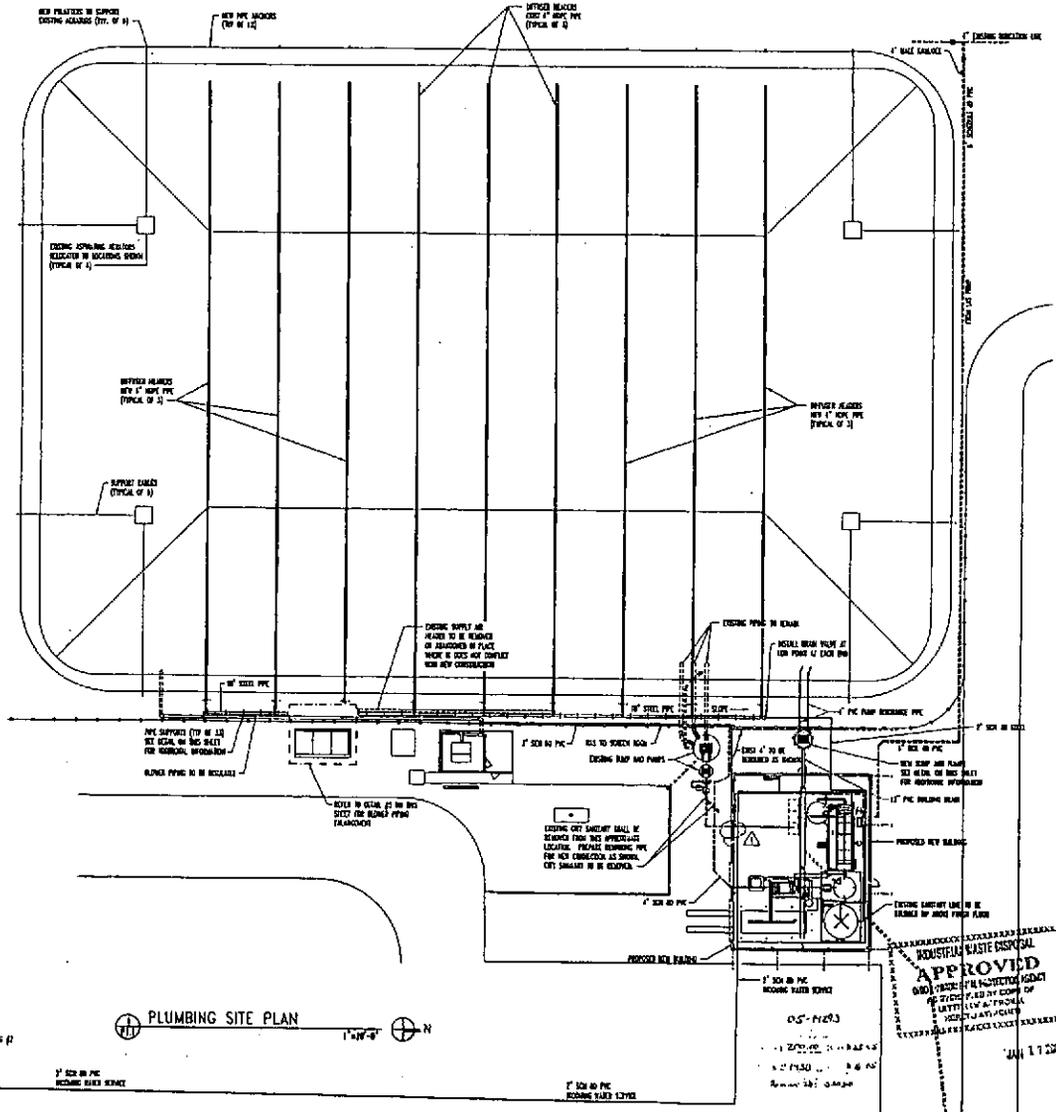
- EQUIPMENT NOTES**
1. CHECK WITH MANUFACTURER FOR ALL DIMENSIONS, WEIGHTS, AND CONNECTIONS. USE MANUFACTURER'S RECOMMENDATIONS FOR ALL CONNECTIONS.



**SUMP DETAIL**  
 1/4\"/>



**BLOWER ENLARGEMENT**  
 1/4\"/>



**PLUMBING SITE PLAN**  
 1\"/>



