



Environmental Protection Agency

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

May 3, 2011

RE: Pretreatment Compliance Inspection and Notice of Violation

Ms. Julie Cotrell
Agrana Fruits US, Inc.
P.O. Box 459
Botkins, OH 45306-0459

Dear Ms. Cotrell:

On April 7th I met with you to conduct a pretreatment compliance inspection of your facility. Looking back at your discharge monitoring report covering the period of July through December 2010, the only reported violation was for a failure to monitoring during the weekly period of July 1st through July 7th. I view the monitoring frequency violation a minor issue in light of the holiday period and that you conducted monitoring on July 8th. Weekly monitoring requires you to collect a sample sometime during days 1 through 7, 8 through 14, 15 through 21 and 22 through 28. Please ensure future monitoring around holiday periods considers these expectations.

At the time of the inspection the second of two new blowers was being made operational. These replacements were necessary because one blower broke down on February 24th and another broke down on March 7th. Both blowers were determined to be un-repairable which left only one blower to provide air to the entire lagoon. You indicated that a new blower was purchased and became operational on March 28th with the other new blower becoming operational on April 7th. I would greatly appreciate information about the blowers (make, model, cost, technical specifications) to support their appropriateness.

The loss of the two blowers caused both very low dissolved oxygen levels and inadequate mixing in the lagoon which has led to a period of now four consecutive weeks that Agrana has violated its Biochemical Oxygen Demand (BOD) concentration limit of 218 mg/l and loading limit of 136 kilograms per day. It appears that violations will likely continue into early May.

The only other know violation for this current reporting period was for a Total Suspended Solids (TSS) violation in January which you attributed to an estimated 4,000 gallons of high fructose corn syrup that spilled into a drain leading to the treatment lagoon. Although it is unknown how this spill led to a TSS violation or why there wasn't an equal jump in the discharge BOD, the lagoon recovered quickly.

A summary of the known violations, based on information you have provided, is as follows:

Table with 4 columns: Parameter, Date (2011), mg/l, kg. Rows include Total Suspended Solids (Jan 25) and Biochemical Oxygen Demand (Mar 21, Mar 29, Apr 5, Apr 12, Apr 19).

Ms. Julie Cotrell
May 3, 2011
Page 2

Agrana appears to be working diligently with NALCO to re-establish an effective microbiological mass in the treatment lagoon. However, during this time you indicated that Agrana has not reduced production activity to reduce the organic load on the treatment lagoon to help it recover. Fortunately, I am not aware of your discharge violations causing the Village of Botkins WWTP to violate its discharge limits.

I believe Agrana needs to develop a plan that avoids serious equipment breakdowns from happening again. Preventative maintenance and equipment monitoring (vibration, heat and/or load sensors) are steps that can be taken to help avoid breakdowns of critical components. Please review all the equipment associated with the conveyance and treatment of wastewater and develop a prioritized list of preventative maintenance activities designed to avoid the loss of functions critical to compliance. In addition to this preventative maintenance list, please give strong consideration to the use of sensors to detect equipment operating conditions outside established limits. I request the list of preventative maintenance items be provided to me by August 1st.

Finally, I believe the likelihood of the remaining original blower to fail in the same manner as the first two is high and, therefore, believe that Agrana should be planning now to purchase its replacement in the near-term instead of waiting for it to fail.

Odors in the DAF Treatment Building

A strong objectionable odor was present in the DAF building that is likely attributable to the residual solids observed in the trench drain. Odors may also be emanating from the sludge storage tank because of a lack of venting from the tank to outside the building. Please consider making the spraying down of the trench drain a daily practice and the installation of a flapper valve on the drain line in the trench drain lift station as ways to reduce odors in this building. Please also consider venting the sludge storage tank outside. Temporary venting could be tried if you have concerns about the possibility of causing odor issues in the vicinity of your neighbors.

Please provide a written response to the issues raised in this letter by June 1st. 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: Jesse Kent - Village of Botkins (w/o attachments, scanned copy via e-mail)
Ryan Laake - Ohio EPA / Central Office / DSW (scanned copy via e-mail)



Southwest District Office

PRETREATMENT INSPECTION REPORT

| | | | | |
|-------------------------------------|-------------------------------------|--|------------------------|-------------------------|
| PERMIT NUMBER 1DP00022*CP | FACILITY NUMBER OHP000126 | DATE CONDUCTED April 7, 2011 | | |
| INSPECTION TYPE I | INSPECTOR S | FACILITY TYPE 2 | TIME IN 1350 | TIME OUT 1630 |

| | |
|--|--|
| GENERAL INFORMATION | |
| NAME AND LOCATION OF FACILITY Agrana Fruit US, Inc. 16197 North County Road 25-A Botkins, OH 45306 | POTW RECEIVING DISCHARGE Village of Botkins WWTP |
| MAILING ADDRESS OF FACILITY Agrana Fruit US, Inc. P.O. Box 459 Botkins, OH 45306 | |
| CONTACT (NAME/TITLE/PHONE/E-MAIL) Ms. Julie Cotrell / Regulatory Coordinator / (937) 693-3821 / Julie.COTRELL@agrana.com | |

| | |
|--|--|
| FACILITY EVALUATION (See Inspection letter for more complete description) | |
| (S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable) | |
| S Sampling Procedures | NA Compliance schedule requirements |
| S Reporting | M Notification |
| U* Compliance with effluent limits | - Other - |
| <i>*see inspection letter for summary</i> | |

| | | |
|--|---|-----------------------|
| Name and Signature of Inspector(s) Matt Walbridge | Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095 | Date 5-3-11 |
| Signature of Reviewer Margy G Burr | Ohio EPA / Southwest District Office / (937) 285-6034 | Date 5/3/11 |

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? 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/N
If yes, explain:

Replaced two production lines with new equipment that allows for faster processing (new 'hot break' process that allows cook times to be reduced). Possible production increase if Dannon expansion increases their production.

WASTEWATER TREATMENT

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

Please see attached diagrams.

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

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

Two new blowers were recently purchased and installed to replace two that failed.

If yes, was a PTI obtained? ***Presumed to be in-kind replacement*** Y/N

PTI Number:

Date:

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

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

Julie Cotrell is the supervisor. The treatment lagoon operates 24/7. The DAF/belt filter press system is operated 24 hours per day, Monday through Friday. Tim Wombold operates the DAF/belt filter press during 1st shift and it is his primary responsibility. Other staff in the maintenance department operate the system during 2nd and 3rd shifts if needed to make up for lost time on 1st. System checks on 2nd and 3rd shifts are documented.

18. How often is the treatment system checked?

Throughout the day.

Operational targets are ~3,000 MLSS (up from 1,500 to 2,000) which is checked weekly. An Imhoff cone is used daily to check for settlability.

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? Y / ~~N~~
 Explain:
Ms. Cotrell has a web cam feed of the DAF to her desktop PC where she can see if surface solids get too close to the effluent end of the DAF. 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 the 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 – this included the blowers that recently failed. 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 it's 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:
(Although wastewater was diverted from the treatment lagoon up to the large lagoon.)

 Have bypasses diversions occurred since the last inspection? ~~Y~~ / N
 Was the POTW notified? NA ~~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 Kloepfel Farm beginning a few months ago. Ms. Cotrell believes they use it as part of their animal feed and compost.*

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 has hog farmers that 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).

Approx. 20 tons of DAF solids (pressed) are generated twice a week. About ten loads per month.

 Name of hauler/landfill/disposal facility:
Jay Holman out of the Maria Stein area (hog farmer) takes the residues - Ringler Feeds is the back-up. Kloepfel Farms takes the DAF solids and waste fruit – believe they're using it in animal feed.

 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. <i>Clean in place (CIP)</i> | N.A. | - | <i>Flows from individual processes are not measured</i> | N.A. | N.A. |
| 2. <i>Tote Washing</i> | N.A. | - | | N.A. | N.A. |
| 3. <i>Floor Wash Downs</i> | N.A. | - | | N.A. | N.A. |
| <i>(These 3 are in order of water usage)</i> | | | | | |
| 4. | | | | | |
| 5. | | | | | |
| Total Regulated Process Flow | <i>Flow Monitoring Station</i> | 165,000 ⁽¹⁾ | ~142,000 ⁽²⁾ | <p>⁽¹⁾ Can be higher if O.K.'d by Village of Botkins and OEPA.</p> <p>⁽²⁾ This valued is based on reported discharge flows for 2010. The average flow for the last six months of 2010 is approximately 146,000 gpd.</p> <p>Higher flows on some production days/weeks are attenuated by the volume of the treatment lagoon.</p> <p>⁽³⁾ Only process wastewater is present at sampling point. Other wastewaters (sanitary, regeneration of small softener used for boiler feed) are discharged to the sewer via a separate line.</p> | |
| Noncontact Cooling | - | - | - | | |
| Boiler Condensate | (3) | - | - | | |
| Reverse Osmosis | | - | - | | |
| Demineralizer Regeneration | (3) | - | - | | |
| Softener Backwash | - | - | - | | |
| Filter Backwash | - | - | - | | |
| Compressor Condensate | - | - | - | | |
| Storm water | - | - | - | | |
| Total of Dilute Flows | N.A. | N.A. | N.A. | | |
| Unregulated Flows | N.A. | - | - | | |
| Sanitary | N.A. | N.A. ⁽³⁾ | N.A. ⁽³⁾ | | |
| TOTAL FLOW | <i>Flow Monitoring Station</i> | 165,000 ⁽¹⁾ | ~142,000 ⁽²⁾ | | |

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

(Storm water runoff is discharged through a swale to the roadside ditch in front of the facility – this runoff continues to appear to be of poor quality at the point of origination but is dispersed as it travels through the grassy lawn area prior to the roadside ditch.)

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 September 2010 to calibrate the meter. They indicated that they performed some type of repair; it would be good to know what that repair was.
Agrana often checks 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 what is required to be reported)** Y / ~~N~~
 If yes, how often is the meter calibrated?
Every month – it's part of the preventative maintenance program.
Done using 4 & 10 buffer solutions with a 7 buffer solution check.
31. Does the facility collect its own samples? Y / ~~N~~
 If no, specify the sample collector:
Tim 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 except Tuesdays.
Agrana collects their weekly sample on Tuesdays (the village won't dump if they're there first).
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)? (N) NA 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 300-gallon totes of aqua ammonia and 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

- Two new blowers for the treatment lagoon had just been installed when I arrived. The microbiology in the lagoon essentially died when one, and then another of the three treatment lagoon blowers broke down. The first stopped working on February 24, 2011. The second stopped working on March 7th. That left only one blower for the whole lagoon. One of the two broken blowers was replaced on March 25th (operational March 28th) and the second blower was installed and operational on April 7th.*
- Still looking into possibly sending DAF solids to composting through a by-products synergy project potentially to be located in Darke County.*
- In March 2011, they transferred approximately 800,000 gallons of waste water from Treatment Lagoon into the Large Lagoon because of the combination of high rainfalls and increased production that normally occurs at the beginning of the year (people eat more yogurt when they start new diets).*
- 25,000 gallons was transferred from the DAF unit to the Large Lagoon in October 2010. In January 2011, Agrana, at the request of the Village of Botkins - who was experiencing flooding conditions, diverted two days of DAF effluent to the Large Lagoon (based on normal flows, I estimate 300,000 gallons total, but actual volumes will be known when they submit their report in July).*
- Irrigation of wastewater from the Large Lagoon in 2011 is expected to increase from 2010 levels.*

