



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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Columbus, Ohio 43215

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**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

November 3, 2010

Rick Cashman  
National Fruit & Vegetable Technology  
210 Water Street  
Baltimore, OH 43105

**Re: Facility Pretreatment Reconnaissance Inspection (4DP00010)  
National Fruit & Vegetable Technology Corporation**

Dear Mr. Cashman:

Thank you for taking time to meet with me on Tuesday, September 21, 2010. The purpose of the meeting was to conduct a facility pretreatment inspection to evaluate compliance with the current Ohio EPA Indirect Discharge Permit conditions and pretreatment requirements. An illicit discharge complaint prompted the inspection. Attached you will find my report and observations from the inspection. The following actions were identified.

- Monitoring reports need to be submitted per your current indirect discharge permit.
- There should be no discharge of wastewater (industrial or domestic sanitary) to your private sanitary lateral until the "cross-connection" between the sanitary sewer and storm sewer is discovered and repaired. This may involve pumping directly to the metering manhole or pumping to a "frac" tank and having it hauled off-site. Please be aware that continuing to discharge to your failing sanitary sewer lateral could be considered a potential criminal case as it is known that there is a "cross-connection" between the sanitary sewer line and waters of the state.
- Please continue efforts to replace old floor drains in the facility.
- The ownership and maintenance responsibility of the storm sewer lines serving your facility need to be discussed with the Village of Baltimore. The Village of Baltimore has stated that your private sanitary sewer lateral ends at the yellow manhole upstream of the metering pit.

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

Rick Cashman  
National Fruit & Vegetable Technology  
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Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please provide this office with a written response and schedule to address the issues listed in this report within 30 days from the date of this letter. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: [greg.sanders@epa.state.oh.us](mailto:greg.sanders@epa.state.oh.us).

Sincerely,



Gregory L. Sanders  
Environmental Specialist  
Division of Surface Water  
Central District Office

Enclosure

c: Marsha Hall, Village of Baltimore

GLS/nsm 21September2010coverletter\_National Fruit & Vegetable.doc

# OhioEPA

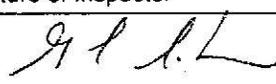
## PRETREATMENT INSPECTION REPORT

State of Ohio Environmental Protection Agency

NPDES PERMIT NUMBER <b>OHP000110</b>	FACILITY PERMIT NUMBER <b>4DP00010*DP</b>	DATE CONDUCTED <b>9-21-2010</b>	
INSPECTION TYPE <b>I</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>2</b>	TIME IN <b>9:30 am</b> TIME OUT <b>3:00 pm</b>

<b>GENERAL INFORMATION</b>	
Name and Location of Facility <b>National Fruit &amp; Vegetable Technology Corporation 210 Water Street Baltimore, OH 43105</b>	POTW Receiving Discharge <b>Village of Baltimore</b>
Mailing Address of Facility <b>same</b>	Categorical Standard(s) or other Classification <b>Non-Categorical Significant User</b>
Contact (Name/Title/Phone) <b>Rick Cashman, CEO 740.862.6300</b>	Other Notes: <b>Inspection prompted by white substance in Paw Paw Creek. The east and west storm water outfalls were also inspected. No discharge from east outfall. Dye tested sanitary line and found to discharge to creek.</b>

<b>FACILITY EVALUATION</b> (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
<b>U</b>	<b>General Facility Operation – A lot of sewer separation work appears to have been done in facility, but sanitary system still has a connection to storm sewer.</b>	<b>U</b>	<b>Pretreatment System – Sanitary sewer system has cross-connection with storm sewer system. Discharge of wastewater to stream.</b>
<b>U</b>	<b>Permit Compliance (Effluent Limitations) – No monitoring reports submitted since June 2009.</b>	<b>U</b>	<b>Self-Monitoring and Reporting – No monitoring reports submitted since June 2009.</b>

Name and Signature of Inspector	Agency / Office / Telephone	Date
<b>Greg Sanders</b> 	<b>OEPA/DSW/CDO/(614)728-3851</b>	<b>October 19, 2010</b>
Signature of Reviewer	Agency / Office	Date
<b>Jeff Bohne, Supervisor; Water Quality</b> 	<b>OEPA/DSW/CDO/(614)728-3841</b>	<b>Nov. 1, 2010</b>

# INDUSTRIAL USER INSPECTION CHECKLIST

National Fruit & Vegetable Technology Corporation

Tuesday, September 21, 2010

## 1.0 COMPLIANCE

\* Does the facility have an effective permit? **Yes, Indirect Discharge Permit (IDP) #4DP00010\*DP. Effective October 1, 2007 and expires September 30, 2012.**

\* Since the last inspection, is the facility in compliance with its permit limits? If no, explain: **No. Monitoring reports have not been submitted since June of 2009 to determine compliance with permit limits.**

\* Is the facility in compliance with all other requirements?

Sampling procedure

Y /  / NA

Reporting (late reporting, failure to report, etc.)

Y /  / NA

Compliance Schedule

Y / N /

Submitted BMR

Y /  / NA

Any other requirement

Y / N /

If any of the above five answers were no, explain: **Monitoring reports have not been submitted since June 2009.**

\* Was the facility required to perform any action as a result the previous inspection?  / N

If yes, has the facility completed those action(s); **No, facility was to start submitting monitoring reports and prevent industrial wastewater discharge to storm water ditch. No monitoring reports received since June of 2009. The inspection was prompted by a storm water complaint of white foamy material in Paw Paw Creek. Dye testing and lab testing confirmed that the white foamy material was discharged from this facility.**

## 2.0 FACILITY OPERATIONAL CHARACTERISTICS

General Facility Description and Operations: **National Fruit & Vegetable Technology (NF&V) is a food manufacturer that currently only processes potatoes for commercial use. The process involves cleaning, cutting, separating and cooking potatoes. The process utilizes a clarifier tank, rotary screens and drum vacuum filters to separate the solid waste from the liquid waste. A waterless microwave cooking system is used to cook the potatoes. A single pass cooling water system is used to cool the electrical units for the microwave oven. The non-contact cooling water is discharged to Paw Paw Creek via the "west storm outfall." The system also includes a potato starch recovery system.**

Number of Employees: **48**

Shifts/Day: **1**

Production Days/Year: **104 / 2 days per week**

Any production changes since the last inspection?

/ N

If Yes, explain: **Production days per year down from 250 days per year to 104 days.**

Any expansion or production increase expected within the next year?

Y /

If Yes, explain:

### 3.0 PROCESS AND WASTEWATER INFORMATION

Provide a process schematic (including relevant dry processes): **See File for IDP and PTI applications.**

\* List all processes generating wastewater as well as their previous (those that the permit limits are based on) and current wastewater flows and production rates. **Below flows are estimated from previous reports/inspections.**

PROCESS	WASTEWATER FLOW (gpd)		PRODUCTION DATA	
	AVG	MAX	PERMIT	CURRENT
1. Peeler wastewater (gray pipe)	20,000			
2. Masher wastewater (white pipe)	1,000			
3. Washwater (equipment)	10,000			
4. Washwater (production area)	15,000			
5. Sanitary (domestic)	1,000			
6. Non-contact Cooling	10,000			
Total process flow (1 - 4)	46,000		kg/day	(same)
			kg/day	(same)
TOTAL	57,000			

Are all the flows discharged to the POTW?

Y /  N

If no, explain: **Non-contact cooling water (NCCW) discharges directly to Paw Paw Creek.**

Are all the flows present at the sampling location?

Y /  N

If no, which flows are not present: **Sanitary (domestic) & NCCW not present at NF&V's sampling location, but sanitary flow is present at Village's sampling station.**

How does the current production rate compare with the production rate used to develop the facilities permit limits? **Non-production based limits used for permit. Production not at expected level.**

Other items: **NF&V has replaced approximately 1/3 of plant floor drains and found several cross-connections between sanitary and storm sewers. The remaining 2/3 of floor drains will be completed when finances are available. The existing wide trench floor drains are being replaced with a narrow stainless steel floor drain. Dye testing and lab testing have revealed a cross-connection between sanitary and storm sewers.**

#### 4.0 WASTEWATER TREATMENT

\* Describe the wastewater treatment system (WWTS): **No, typical treatment system. The only pollutant parameter with a limit is pH, which is met without treatment or addition of chemicals.**

\* Was a PTI issued for the treatment system?

Y /  / N

What is the treatment mode of operation?  
If batch, list frequency and duration:

Batch /  /  / Combination

Is there a full-time wastewater treatment operator?

Y /  / NA

If no, how often is treatment system checked? **Sanitary line checked daily.**

Is there an operations and maintenance manual?

Y /  / NA

Is an inventory of critical spare parts maintained?

Y /  / NA

Are there any bypasses in the system?

/ N / NA

If yes, location: **unknown cross-connection in sanitary sewer.**

If yes, have bypasses occurred since last inspection?

/ N

If yes, was the POTW notified?

/ N

Method of sludge disposal: **Potato peels taken to a farmer for land disposal. Permit pending through Division of Solid and Hazardous Waste Management. Starch recovered and sold to vendor.**

Name of sludge hauler: **local farmer.**

Frequency and amount of disposal: **Depends on production.**

Is any sludge generated subject to RCRA regulations?

Y /  / N

#### 5.0 TOXICS MANAGEMENT

Are any TTOs used in the facility?

Y /  / N

If yes, identify TTOs:

Does the facility have a current SPCC Plan?

Does the facility have a current TOMP?

Y / N /  / NA

If yes, is it being implemented?

Does the facility need a plan to control slug loads?

Y /  / N

\* If yes, does the facility have a plan?

Y / N

If yes, is it being implemented?

Y / N

Identify any potential spill areas: **In the chemical storage areas. Nearby floor drains plugged and drums stored in secondary containment.**

## 6.0 SELF-MONITORING

\* Sampling location described in their permit. **Catch basin following the potato processing pretreatment unit.**

Is the facility sampling at the location described in their permit?  / N / NA  
If no, described the sampling location:

Is the sampling location representative?  / N  
If no, indicate a representative location:

Are all connections to the sewer monitored?  / N  
If yes, explain: **Monitored by Village**

Is the flow measured or estimated? M /  E  
If measured, when was flow meter last calibrated? .

Is pH measured with a pH meter?  / N  
If yes, how often is the meter calibrated? **unknown**

Is pH continuously monitored? Y /  N

Does the facility collect its own samples? Y /  N  
If no, who collects the samples? **Masi Environmental Services.**

Does the facility follow appropriate sampling procedures? **Monitoring data not provided since June of 2009.  
Could not evaluate sampling procedures.**

\* Monitoring frequencies? Y /  N

\* Sample collection (grab=pH, CN, VOC) Y / N /  NE  
Flow proportioned samples? Y / N /  NE  
Proper preservation techniques? Y / N /  NE  
Sample holding times? Y / N /  NE  
Chain-of-custody forms? Y / N /  NE

Are samples analyzed according to 40 CFR 136? Y / N /  NE

Laboratory conducting analyses: **Masi Environmental Services.**

## 7.0 OTHER OBSERVATIONS/NOTES

During inspection, it was a sunny day, without rains for several days. East storm water outfall did not have flow. West storm water outfall was flowing in ditch about three inches deep.

Newly installed stainless steel drains were one inch wide and approximately three inches deep.

Plant divided into four sanitary sewer systems. System A consists of rear of building. System B consists of middle of building. System C consist of microwave area and hallway with floor drains. The discharge from system C can also contain "outdated" or "spoiled" milk. System C flows into system B. System D consists of two sets of restrooms in production area and one set in office area. Flow from systems A, B & C flow to sampling catch basin (stainless steel hatch outside machine shop).

The meter in the Village's metering mahole needs calibrated. Last calibration was three years ago.

The location of the NCCW outfall has changed from the east storm water outfall to the west storm water outfall. Also, the NCCW is now supplemented with well water to reduce the temperature of the NCCW. The Agency will conduct sampling on this discharge to determine if it needs to be permitted.

Dye tested sanitary line from plant twice, once with yellow dye and once with red dye. Both dye testing resulted in dye in west storm water outfall.

Lab testing of white foamy material in Paw Paw Creek was a 98% match to NF&V's process discharge.

Monitoring reports have not been submitted since June 2009.

The Village of Baltimore has stated that NF&V's private sanitary lateral ends at the manhole located upstream of the metering pit. The manhole is painted yellow and is located between two yellow protective barriers. NF&V shall have maintenance responsibility of its private sanitary lateral.

## 8.0 REQUIRED FOLLOW-UP ACTIONS

1. Submit monitoring reports per indirect discharge permit.
2. Do not discharge wastewater (industrial or domestic sanitary) to your private sanitary lateral until the "cross-connection" is discovered and repaired. This may involve pumping directly to the metering manhole or pumping to a "frac" tank and having it hauled off-site.
3. Continue efforts to replace old floor drains in the facility.
4. Discuss ownership and maintenance responsibility of storm sewer lines with the Village of Baltimore.
5. Provide this office with a written response with a schedule to address the issues listed above within 30 days from the date of this letter.