



FILE COPY

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

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Columbus, Ohio 43215

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

December 4, 2008

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

Re: Facility Pretreatment Reconnaissance Inspection (4DP00010)

Dear Mr. Cashman:

Thank you for taking time to meet with Jan Rice and myself on Tuesday, November 25, 2008. The purpose of the site visit was to evaluate your compliance with the Ohio EPA indirect discharge permit conditions and pretreatment requirements. During the site visit, we also reviewed and discussed industrial storm water items.

Attached you will find my report and observations from the site visit. **The following actions are required by National Fruit & Vegetable Technology:**

1. There was no monthly reporting for May 2008. Monthly operating reports need to be submitted per your current indirect discharge permit. Please explain why the monthly monitoring report was not submitted for May 2008 and provide copies of these reports.
2. Please submit a detailed schematic of all sanitary and storm lines in the building, under the building and on the plant property. All lines shall be labeled. Please also include various production lines such as the brown and white water process lines.
3. You must submit a land application management plan for the land application of starch filter waste. This management plan must be submitted to Jacob Howdyshell in the Division of Surface Water in Central Office at the Ohio Environmental Protection Agency. You must obtain approval of this management plan prior to further land application of starch filter waste.
4. You must submit a request to land apply potato peels to Phil Farnlarcher in the Division of Solid and Infectious Waste Management in Central District Office at the Ohio Environmental Protection Agency. You must obtain approval prior to further land application of potato peels.

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

5. The storage of the chemical drums must be enclosed inside of a dike or other containment facility. There are sanitary sewer floor drains within close proximity of the drum storage area. If a drum leaked or was spilled, it could cause interference with the Village's wastewater treatment plant. You may also permanently plug the floor drains.

Ohio EPA looks forward to working with National Fruit & Vegetable Technology to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. Please submit the above action items within 30 days from the date of this letter. If you need additional information or assistance, please feel free to contact me by e-mail at: greq.sanders@epa.state.oh.us or phone at (614) 728-3851.

Sincerely,



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

Enclosure

c: Dennis Rose, Utilities Director, Village of Baltimore
Ryan Laake, Ohio EPA/DSW/CO

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OhioEPA

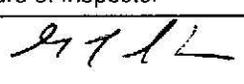
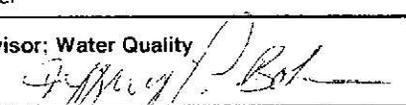
State of Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

NPDES PERMIT NUMBER OHP000110		FACILITY PERMIT NUMBER 4DP00010*DP		DATE CONDUCTED 11-25-2008	
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 1	TIME IN 10 AM	TIME OUT 12:50 PM	

GENERAL INFORMATION	
Name and Location of Facility National Fruit & Vegetable Technology Corporation 210 Water Street Baltimore, OH 43105	POTW Receiving Discharge Village of Baltimore
Mailing Address of Facility same	Categorical Standard(s) or other Classification Non-Categorical Significant User
Contact (Name/Title/Phone) Rick Cashman - 740.862.6300 office & 614.562.0400 cell Mitch Adams - CEO	Other Notes: Name changing to Fresh Vegetable Technology Plant not in operation during inspection

FACILITY EVALUATION (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
M	General Facility Operation - Facility well maintained at time of site visit. Chemical storage area needs a dike or floor drains plugged.	S	Pretreatment System -- appeared satisfactory at time of site visit.
S	Permit Compliance (Effluent Limitations) - No deficiencies noted. Village stated loading is elevated at times.	U	Self-Monitoring and Reporting - No monthly operating reports were submitted for May 2008.

Name and Signature of Inspector	Agency / Office / Telephone	Date
Greg Sanders  Jan Rice	OEPA/DSW/CDO/(614)728-3851 OEPA/DSW/CDO/(614)728-3850	12-4-08
Signature of Reviewer	Agency / Office	Date
Jeff Bohne, Supervisor, Water Quality 	OEPA/DSW/CDO/(614)728-3841	12-8-08

INDUSTRIAL USER INSPECTION CHECKLIST

National Fruit & Vegetable

Tuesday, November 25, 2008

1.0 COMPLIANCE

- * Does the facility have an effective permit? **Yes, issued August 24, 2007 and expires September 30, 2012.**
- * Since the last inspection, is the facility in compliance with its permit limits? If no, explain: **No, did not submit monthly monitoring reports from May 2008.**

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

Sampling procedure	Y / N / NA
Reporting (late reporting, failure to report, etc.)	Y / N / NA
Compliance Schedule	Y / N / NA
Submitted BMR	Y / N / NA
Any other requirement	Y / N / NA

If any of the above five answers were no, explain:
Did not report results for May 2008.

- * Was the facility required to perform any action as a result the previous inspection? **Y / N**
If yes, has the facility completed those action(s)

If no, explain: **Monthly reporting was not submitted for all reporting periods.**

2.0 FACILITY OPERATIONAL CHARACTERISTICS

General Facility Description and Operations: Fence making

Number of Employees: **12 to 40** Shifts/Day: **1** Production Days/Year: **5 days/wk or 260 days/yr**

- Any production changes since the last inspection? **Y / N**

If Yes, explain: **Production of wedge slices instead of dices due to client demand. The process of wedge slices generates less potato peel waste and starch waste. Added 4,000 lineal feet of racks for heat exchanging and a freezer to the facility, however, this does not add new process flow.**

- Any expansion or production increase expected within the next year? **Y / N**

If Yes, explain: It will depend on future contracts.

3.0 PROCESS AND WASTEWATER INFORMATION

Provide a process schematic (including relevant dry processes):

- * 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.

PROCESS	WASTEWATER FLOW (gpd)		PRODUCTION DATA	
	AVG	MAX	permit	current
Brown water - cleaning water				
White water - starch from water (After peeled and sliced)				
Potato peels - to land application				
Plant cleaning done nightly				
TOTAL		60,000		

Are all the flows discharged to the POTW?

Y / N

Yes, to pretreatment system, water recycled and then to Baltimore's sewer system. NF&V believes that their sanitary lateral may have flow from another entity which increases their flow values.

Are all the flows present at the sampling location?

Y / N

If no, which flows are not present:

How does the current production rate compare with the production rate used to develop the facilities permit limits? **The organic loading should not be as high in the wastewater due to contract with wedge-type cuts in production versus the dicing production method.**

4.0 WASTEWATER TREATMENT

- * Describe the wastewater treatment system: **Plant recycles much of wastewater. It is screened, settled, and sent through filter press prior to discharge to the Village. Some of flow is continuous, however, most of flow in the treatment system operates as a batch system with most of flow discharging at the end of the shift.**
- * Was a PTI issued for the treatment system? **Y / N**
- What is the treatment mode of operation? **Batch / Continuous / Combination**
If batch, list frequency and duration:
- Is there a full-time wastewater treatment operator? **No, part-time, about 1/hr per day** **Y / N / NA**
If no, how often is treatment system checked?
- Is there an operations and maintenance manual? **Y / N / NA**
- Is an inventory of critical spare parts maintained? **Y / N / NA**
- Are there any bypasses in the system? **Y / N / NA**
If yes, location:
If yes, have bypasses occurred since last inspection? **Y / N**
If yes, was the POTW notified? **Y / N**
- Method of sludge disposal:
- Name of sludge hauler: **Potato peels and sometimes starch filter press waste is hauled to local farm for land application. A management plan will need to be submitted to authorize land application of an industrial waste produced by this facility.**
- Frequency and amount of disposal: **Approximately one ton of waste land applied daily.**
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? **May consider the need for a slug plan.** **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: **Yes, there is a storage areas for chemicals which are stored in 55 gallon drums. The drums are located near several sanitary sewer drains. It was requested to dike the drum storage area or plug the nearest sanitary sewer drains. The drums contain food additives & cleaning agents.**

6.0 SELF-MONITORING

* Sampling location described in their permit.

Is the facility sampling at the location described in their permit?

Y / N / NA

If no, described the sampling location:

Is the sampling location representative?

Y / N

NF&V installed their own flow meters and stated that their meters do not provide the same flow values as the Village's flow meter. A schematic of the location of the meters is provided. NF&V believes that there may be another connection to their sanitary lateral which contributes flow to the Village's flow meter. NF&V states that the Village's flow meter shows flow at the plant when they are not operating.

If no, indicate a representative location:

Are all connections to the sewer monitored?

Y / N

If yes, explain:

Is the flow measured or estimated?

M / E

If measured, when was flow meter last calibrated?

Is pH measured with a pH meter?

Y / N

If yes, how often is the meter calibrated?

Is pH continuously monitored?

Y / N

Does the facility collect its own samples?

Y / N

If no, who collects the samples?

Does the facility follow appropriate sampling procedures?

* Monitoring frequencies?

Y / N

* Sample collection (grab=pH, CN, VOC)

Y / N

Flow proportioned samples?

Y / N

Proper preservation techniques?

Y / N

Sample holding times?

Y / N

Chain-of-custody forms?

Y / N

Are samples analyzed according to 40 CFR 136?

Y / N

Laboratory conducting analyses: **Mitch Adams, CEO takes samples and sends to MASI labs.**

7.0 OTHER OBSERVATIONS/NOTES

New potato peeling system installed which uses little to no water, they no longer boil potatoes and discharge the high BOD/flow to Baltimore's WWTP. The old system used 2.5 gallons of water per 1 pound of product.

Three waste streams; domestic wastewater, brown water & white water. Brown water is from washing of potatoes. White water is from removing surface starches from potatoes and condensing starch to sell starch.

Potato peels and sometimes starch filter waste is land applied daily. A land application management plan will need to be submitted and approved prior to land application of the potato peels and starch filter waste.

Plastic trays going through microwave are used to turn off and on microwave system and also is a trigger to speed up or slow down process.

A pretreatment system is being stored outside and will be installed when new clients warrant the installation.

8.0 REQUIRED FOLLOW-UP ACTIONS

Must submit a land application management plan for land application of the starch filter waste.

You must request approval for the land application of potato peels.

Submit schematic of all sanitary and storm lines in building and on property. Lines should be labeled which show various production lines such as brown and white water process lines.

Please explain why May 2008 monthly reports were not submitted. Please provide copies of these reports.

Must submit all monthly reports.

Please provide dike around chemical storage drums or permanently plug floor drains near chemical storage area.