

**Environmental
Protection Agency**

Ohio Department of Public Safety
Governor
Lt. Governor
Director

September 2, 2011

RE: CASE FARMS, INC.
WASTEWATER
HOLMES COUNTY
NPDES PERMIT NO. 3IH00103

Mr. Paul Nelson, Plant Manager
Case Farms Inc.
P.O. Box 185
Winesburg, OH 44690

Mr. Nelson:

On August 23, 2011, this writer conducted an inspection of the Case Farms wastewater treatment plant to evaluate operations and maintenance of the system. In addition, the monthly compliance reports submitted by Case Farms were evaluated to determine compliance with the NPDES Permit. Representing Case Farms during the inspection was Mr. Randy Mattison.

Observations:

Following are observations made at the time of the inspection.

1. All treatment processes appeared to be operational. The treatment processes observed were screening, dissolved air floatation, anoxic pretreatment, aerated pretreatment, aeration, and clarification. The treatment system also has flow equalization available to store peak wastewater flows. It is understood from Mr. Mattison that Case Farms maintains an inventory of critical spare parts for treatment equipment.
2. The anoxic tank, the pre-aeration tank and the aeration tank all had good color and mixing. The medium brown color of the tank contents indicated a healthy biomass of microbes necessary for treatment.
3. The clarifier contents were clear at the time of the inspection. Duck weed was apparent on the surface of the clarifier, however, it did not appear to hinder treatment. The effluent discharging from the system was clear and had no odor or color.
4. The wastewater plant was well operated and maintained. The operators of the plant appear to have a good understanding of treatment processes and operational requirements.

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Concerns Noted During the Inspection

Following are concerns noted during the inspection.

1. It is understood that a second shift will be added to production in the near future. The increased flow of wastewater from the second shift will result in an increase in sludge production at the treatment plant.

Be advised that the sludge tank currently has a storage period of only 20 days for a single shift. The increased sludge production resulting from the additional shift will only add to the capacity problem. In addition, Case Farms will be prohibited from applying sludge to frozen ground in the near future which will further compound the problems associated with the plant's sludge storage capacity. The sludge storage facilities must be expanded to provide at least 180 days of sludge storage capacity. The 180 day minimum is necessary in order to account for the time period in northeast Ohio that ground could potentially be frozen.

Case Farms must provide a response identifying actions that will be taken to increase the sludge storage capacity to 180 days. Usually, the most economical option is to construct a shelter to house pressed sludge. However, other options exist that Case Farms may consider.

Changes to the sludge program discussed above, along with any significant increase in sludge production, may necessitate modification of the sludge management plan for the wastewater treatment plant. The NPDES Permit renewal scheduled for the first half of 2012 will address any required changes to the sludge management plan.

2. Plant personnel collect daily process control samples to monitor the condition of the treatment system. The samples are critical to operation of the treatment system and to maintaining compliance with the NPDES Permit.

The process control samples are analyzed in a small laboratory in the blower building. However, the condition of the laboratory is not conducive to providing consistently accurate results. Dust and other problems associated with the uncontrolled environment can create problems with sample analysis. In addition, the bench space and the floor space in the laboratory is inadequate. Because of these concerns, and because of the importance of accurate process control sample results, it is recommended that Case Farms consider improving the laboratory facilities by providing increased bench space and a controlled environment.

3. It is understood that construction will be initiated to relocate or increase parking facilities and/or to construct processing operations. Survey markers were apparent during the inspection; however, plans regarding future construction activities are unknown. Be advised that in the event one acre or more of soil is to be disturbed, Case Farms will be required to submit a Notice of Intent (NOI) to Ohio EPA for construction activities. In addition, Case Farms will be required to develop and have on site a Storm Water Management Plan to identify actions that will be taken to control sediment runoff during the construction activities. Further information regarding construction activities and storm water management options is available at the following web address: <http://www.epa.state.oh.us/dsw/storm/index.aspx>.

In the event construction activities will result in a change in the site plan, the Storm Water Pollution Prevention Plan (SWP3) for Case Farms will need to be updated per Part VI, Item C of the NPDES Permit. The revised SWP3 must be submitted to this office in order to keep the record current.

Compliance Review

The compliance record for Case Farms was reviewed as part of this inspection. The period of review includes July 2010 through July 2011. Following are violations reported over the review period.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2011	001	Total Suspended Solids	1D Conc	30	32	2/1/2011
February 2011	001	Total Suspended Solids	30D Conc	20	25.625	2/1/2011
February 2011	001	Total Suspended Solids	1D Conc	30	31	2/22/2011
July 2011	001	Nitrogen, Ammonia	30D Conc	1.49	1.77444	7/1/2011
July 2011	001	Nitrogen, Ammonia	30D Qty	2.8	2.93524	7/1/2011
July 2011	001	Nitrogen, Ammonia	1D Conc	4.5	13.62	7/6/2011
July 2011	001	Nitrogen, Ammonia	1D Qty	8.5	24.7963	7/6/2011
July 2011	001	Nitrogen, Ammonia	1D Conc	4.5	13.42	7/7/2011
July 2011	001	Nitrogen, Ammonia	1D Qty	8.5	20.2670	7/7/2011

A report identifying the causes for the violations was provided by Mr. Mattison as required by Part III, Item 12 of the NPDES Permit.

Permit to Install Requirements

As discussed previously in an August 4, 2010 letter from this office, it is understood that the pretreatment area will be modified in the future to add treatment for oil recovery. In

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addition, modifications to the sludge handling facilities will be made in order to provide 180 days of storage. Be advised that in accordance with Ohio Administrative Code 3745-42 and Ohio Revised Code 6111.45, a Permit to Install from the Director of Ohio EPA is required prior to the installation of additional treatment or modification of an existing system. The forms for submitting a Permit to Install application can be found at: <http://www.epa.state.oh.us/dsw/pti/PTIForms.aspx>.

Response Requested

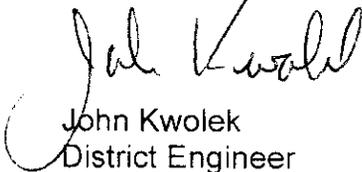
A response to this inspection report is requested to provide information regarding the concerns noted above. The following items must be addressed in the response.

- a) Actions that will be taken to increase sludge storage capacity to 180 days,
- b) Actions that will be taken to improve laboratory facilities at the treatment plant, and
- c) A description of construction activities associated with the survey markers observed during the inspection. The response must confirm that Case Farms understands the requirement for an NOI for construction activities and the requirement for the construction SWP3.

The response should be submitted to this office no later than September 30, 2011.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this inspection report.

Respectfully,


John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Randy Mattison, Treatment Plant Operator, Case Farms, Inc.