



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

July 24, 2008

RE: CASE FARMS INC.
3IH00103 *FD
HOLMES COUNTY

Randy Mattisson
Wastewater Manager
Case Farms Inc.
P.O. Box 185
Winesburg, Ohio 44690

Dear Mr. Mattisson:

On July 23, 2008, this writer met with you to discuss compliance with the above referenced NPDES permit and inspect the treatment plant. At the time of the inspection, the plant was generally in good operation. Noted was the following:

- 1) One of the chlor/dechlor tanks was down for maintenance, the other contained floating materials.
- 2) The refrigerator used for composite sampling did not contain a thermometer, therefore, the proper temperature could not be verified.
- 3) The final effluent was clear.
- 4) Reportedly approximately 200 gpm are being recycled back to the processing plant.
- 5) No visual problems were noted with the receiving stream.

Your facility has been identified as being in significant non-compliance for the time period of December 2007 thru June 2008, by our compliance monitoring system. The following is a summary of those violations:

Numeric Violations

Station	Parameter		Limit Type	Limit	Reported Value	Violation Date
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	9.54	12/19/2007
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	10.	12/20/2007
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	16.0105	12/20/2007
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	8.43	1/7/2008

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001	Nitrogen, NH3	Ammonia	1D Conc	8.0	8.83	1/8/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	13.	1/9/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	19.0915	1/9/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	12.	1/10/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	17.6229	1/10/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	10.	3/5/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	18.8493	3/5/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	10.	3/6/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	18.6979	3/6/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	10.22	3/10/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	9.39	3/11/2008
001	Nitrogen, NH3	Ammonia	30D Conc	5.0	6.05389	4/1/2008
001	Nitrogen, NH3	Ammonia	30D Qty	9.5	10.3690	4/1/2008
001	Phosphorus, Total (P)	Ammonia	30D Qty	1.89	1.92533	4/1/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	9.2	4/2/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	9.59	4/3/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	17.8223	4/3/2008
001	Total Solids	Suspended	1D Conc	30	48.	4/10/2008
001	Total Solids	Suspended	1D Qty	56.8	82.1193	4/10/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	22.5680	4/15/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	11.4	4/16/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	17.087	4/16/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	12.1	4/17/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	24.6395	4/17/2008

001	Nitrogen, NH3	Ammonia	1D Conc	8.0	13.	4/23/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	18.5994	4/23/2008
001	Nitrogen, NH3	Ammonia	1D Conc	8.0	13.	4/24/2008
001	Nitrogen, NH3	Ammonia	1D Qty	15.1	25.0453	4/24/2008
001	Nitrogen, NH3	Ammonia	1D Conc	4.5	6.75	5/21/2008
001	Nitrogen, NH3	Ammonia	1D Qty	8.5	10.7560	5/21/2008
001	Nitrogen, NH3	Ammonia	1D Conc	4.5	13.	5/22/2008
001	Nitrogen, NH3	Ammonia	1D Qty	8.5	23.8152	5/22/2008

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
002	pH	1/Month	1	0	02/01/2008
002	Water Temperature	1/Month	1	0	02/01/2008

In addition, our files do not contain non-compliance notifications as required in Part III, Section 12, for a majority of the above listed violations. This is considered a separate violation of your permit. We request that you provide a written response to address the above listed violations no later than August 8, 2008. The response should include an explanation for their occurrence and plans for returning to compliance as soon as possible. Please be advised that a continuance of significant non-compliance may subject your company to an enforcement action in accordance with Ohio Revised Code 6111.

Reasons given for the above violations as well as past violations previously noted were that the treatment plant is constantly operating at peak design performance. For example, the DAF unit is operating at above its design capacity. Standby pumps are in constant use to handle peak flows and there are no spares kept on-site. Frequent power outages, cause a gravity flow thru situation, which is somewhat handled by moving portable pumps around the plant. This is not a desired operational procedure. A permanent generator should be installed at the plant to handle power outages. Rain events cause the plant to become hydraulically overloaded, a reason given for the numerous ammonia violations. Sludge storage is still inadequate as currently there is only 12 days of storage time. If the belt press goes down, there will be a crisis. An additional Class III Operator has not been hired to fill in for vacation or unplanned absences. There are no other operators with a license employed on-site by Case Farms.

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If you should have any questions concerning any of the above, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Engineer
Division of Surface Water

PR:bo

pc: Bob Knipmeyer, Ohio EPA, Directors Office
Paul Nelson, Case Farms Inc.
Chuck McDaniel, Case Farms Inc.
Tom Shelton, President, Case Farms

File: Industrial/Permit Compliance