OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

October 27, 2008

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

Mr. Paul Nelson
Case Farms Inc.
P.O. Box 185
Winesburg, Ohio 44690

Dear Mr. Nelson:

On September 17, 2008, this writer conducted a compliance evaluation inspection for the purpose of determining compliance with the above referenced NPDES permit. Randy Mattisson, Operator, Case Farms accompanied me during the inspection. Below you will find a summary of the visit:

Outfall 002

- Outfall 002 is non-contact cooling water. The outfall location is west of the engine room. Sampling is inside the engine room building at a valve port and is considered representative. A small amount of compressor condensation also enters this outfall. There is no treatment of this water before it travels south within a ditch before turning east to eventually entering the route 160 ditch.
- At the time of the inspection there were no visual problems noted with this outfall.

Outfall 001

- Outfall 001 is the discharge of treated process waters, sanitary wastewater, and contaminated storm water from the chicken receiving areas. Treatment consists of Offal screening, Dissolved Air Floatation, Anoxic Tank, Flow Equalization, Aeration, Flocculation, Clarification, Chlorination/Dechlorination, and then discharge to the Route 160 ditch.
- At the time of the inspection there were no visual problems noted with this outfall.

Both outfalls 001 and 002 are conveyed across the Route 160 via a culvert and then flow down a steep hillside before entering an unnamed tributary to Indian Trail Creek. At the point of discharge to this unnamed tributary, outfalls 801 and 901 were added to the 2002 NPDES permit and continued with the renewal in August 2007. The unnamed tributary is a headwater stream which is continually fed by groundwater. Upstream/downstream outfalls 901/901 contain chemical sampling and with the 2007 permit renewal also contains biological monitoring.

Items noted during the inspection were:

1) Three drums located outside the engine room need to be stored inside.
2) The DAF receives a BOD of approximately 2500 mg/l and reduces to 500 mg/l BOD out to the treatment plant. Tests are done for in house information twice per week.
3) A sludge press has been installed at the DAF to dewater the rendering sludge. This was done without a permit-to-install.
4) In the DAF building a 5000 gallon storage tank receives treated 001 effluent used for polymer mixing, priming pumps and washdown waters.
5) Floor drains were observed in the maintenance garage. It was not known where they discharge.
6) A DR2000 is used to monitor for Cl2, NH3, Turbidity, Nitrates, and Phosphate. Results generated are for internal use only for operational control.
7) A ½ hour settling test is done on the sludge every day on the EQ and Aeration basins.
8) A flow weighted composite sample is taken on the discharge from outfall 001.

Your facility has been identified as being in significant noncompliance for the time period of December 2007 through September 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, Ammonia (NH3	1D Conc	8.0	9.54	12/19/2007
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	10.	12/20/2007
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	16.0105	12/20/2007
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	8.43	1/7/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	8.83	1/8/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	13.	1/9/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	19.0915	1/9/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	12.	1/10/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	17.6229	1/10/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	10.	3/5/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	18.8493	3/5/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	10.	3/6/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	18.6979	3/6/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	10.22	3/10/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	9.39	3/11/2008
001	Nitrogen, Ammonia (NH3	30D Conc	5.0	6.05389	4/1/2008
001	Nitrogen, Ammonia (NH3	30D Qty	9.5	10.3690	4/1/2008

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Phosphorus, Total (P)	30D Qty	1.89	1.92533	4/1/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	9.2	4/2/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	9.59	4/3/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	17.8223	4/3/2008
001	Total Suspended Solids	1D Conc	30	48.	4/10/2008
001	Total Suspended Solids	1D Qty	56.8	82.1193	4/10/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	22.5680	4/15/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	11.4	4/16/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	17.087	4/16/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	12.1	4/17/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	24.6395	4/17/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	13.	4/23/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	18.5994	4/23/2008
001	Nitrogen, Ammonia (NH3	1D Conc	8.0	13.	4/24/2008
001	Nitrogen, Ammonia (NH3	1D Qty	15.1	25.0453	4/24/2008
001	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.75	5/21/2008
001	Nitrogen, Ammonia (NH3	1D Qty	8.5	10.7560	5/21/2008
001	Nitrogen, Ammonia (NH3	1D Conc	4.5	13.	5/22/2008
001	Nitrogen, Ammonia (NH3	1D Qty	8.5	23.8152	5/22/2008
001	Chlorine, Total Residu	30D Conc	0.019	.08727	7/1/2008
001	Chlorine, Total Residu	30D Qty	0.04	.1721	7/1/2008
001	Phosphorus, Total (P)	30D Conc	1.0	2.16814	7/1/2008
001	Phosphorus, Total (P)	30D Qty	1.89	3.35247	7/1/2008
001	Chlorine, Total Residu	1D Conc	0.038	1.92	7/22/2008
001	Chlorine, Total Residu	1D Qty	0.07	3.78621	7/22/2008
001	Nitrogen, Ammonia (NH3	1D Conc	4.5	7.64	8/13/2008
001	Nitrogen, Ammonia (NH3	1D Qty	8.5	13.0706	8/13/2008

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 your August 7, 2008 response to this office's last letter dated July 24, 2008 you indicated that an engineering group was scheduled to visit the plant to evaluate and make recommendations for improvements. Please forward a copy of any reports or letters issued by the consultant to this office a soon as possible. Also, you indicated that it was anticipated that the problem of not having a Class III Operator available would be resolved by early October. Please update this office on this matter.

Your company continues to be in violation of the NPDES permit. It has been pointed out on several occasions that improvements to the treatment facilities are needed. Please be advised that we are nearing a point where we will have no choice but to recommend to our Central Office an enforcement action be taken to install necessary treatment and pursue a monetary penalty as allowed by Ohio Revised Code 6111. 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

cc: Randy Mattisson, Case Farms Inc.
Chuck McDaniel, Case Farms Inc.
Tom Shelton, President, Case Farms

File: Industrial/Permit Compliance