



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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

June 9, 2009

RE: WAYNE COUNTY  
OHIO FARMS PACKING  
3IH00074

**NOTICE OF VIOLATION**

Mr. Jim Fisher, Facility Manager  
Ohio Farms Packing  
2416 W. Salem Road  
Creston, Ohio 44217

Dear Mr. Fisher:

On May 27, 2009 this writer met with you, Mr. Dave Pitsenbarger and Mr. Tom Nolan to conduct an inspection of the above referenced facility. The intent of the inspection was to evaluate the operations and maintenance of the upgraded wastewater treatment plant and discuss the noncompliance with your NPDES permit.

Our records indicate a Permit-to-Install (PTI) for upgrades to the wastewater treatment plant was approved by Ohio EPA in December 2005. The upgrades consisted of an 8-inch sanitary sewer line followed by a raw wastewater pumping station, preliminary screening, a 64,000 gallon flow equalization tank and a 15,400 gallon sludge holding tank.

The existing wastewater treatment plant consists of a trash trap, followed by a 16,500 gallon extended aeration treatment plant, a 5,400 gallon aerated sludge tank, dosing chamber, surface sand filter, a chlorine contact tank and a polishing pond which discharges to the Killbuck Creek. At the time of the inspection, the wastewater treatment plant was producing a satisfactory quality effluent. Below are the findings and recommendations from the inspection:

- 1) At the time the PTI was approved by Ohio EPA, the plant was to operate at the NPDES permitted flow of 16,500 gpd. The upgrades completed were Phase 1 of a two phase wastewater treatment plant upgrade. The Phase 2 wastewater treatment plant upgrades are projected to include advanced wastewater treatment technology and would assist the facility in meeting the effluent limits in your NPDES permit. You indicated the Phase 2 improvements are in the design phase with your engineering firm, Engineering Associates, Inc. The PTI is expected to be submitted to our office for approval in the next few months.
- 2) During the inspection, it was mentioned that the flow equalization tank is hydraulically overloaded and therefore overloading the existing 16,500 gpd treatment plant. A few items could be contributing to the hydraulic overload problem. In 2006, a fire damaged a large portion of the facility. The newly constructed facility is slightly larger than the older facility and allows for more washwater to be generated. It is understood the kill schedule has not increased since the new building was constructed.

It was also brought to our attention that the water treatment plant backwash water is directed to the wastewater treatment plant. This water treatment plant backwash water proposal was submitted to this office in December 2007. According to our records, the backwash water would generate approximately 471 gpd. At that time, we did not object to the proposal but rather wanted the facility to be aware that it could contribute to a



dilution problem and a hydraulic capacity problem for the wastewater treatment plant. This office is concerned the combination of washwater /cleanup water and the backwash water from the water treatment plant is overloading the flow equalization tank and therefore the wastewater treatment plant.

- 3) The mixed liquor in the aeration tank was a chocolate brown color and was provided with adequate rollover and good air circulation throughout the tank. The sludge return line was in operation and was returning a concentrated solid. There was minimal foam visible in the tank. The clarifier portion of the tank was in operation and some floating solids were visible on the surface of the tank. The skimmer was visible and was in operation and was returning a clear liquid. The weirs and influent baffle had solids accumulating in them. It is understood the sidewalls of the clarifier are scraped down every week.
- 4) The sand filters were flooded at the time of the inspection but did not appear to have overflowed the sidewalls of the filter bed. It was mentioned during the inspection that this was a normal operation mode for the filters. Mr. Pitsenbarger indicated the underdrains had been checked to ensure the filters were draining properly and the underdrains looked adequate. The water from the filters is periodically removed from the top and taken to the sludge holding tank, along with the solids removed from the sand itself. The filters are alternated every week. This office is concerned the sand filters would overflow if the flooding over the media was too high. Our records indicate this did occur in the past. As such, we recommend the PTI for the Phase 2 upgrades be submitted as soon as possible.
- 5) The chlorinator and dechlorinator appeared to be in good working condition with no deficiencies noted. The effluent from the dechlorination point to the lagoon was clear.
- 6) The pond had a significant amount of duckweed growth present. The outlet pipe from the pond was visible and was in good condition. The final outfall from the pond to the Killbuck Creek was clear and in good condition. There was some minor weed growth around the final outfall.
- 7) The solids removed from the wastewater treatment plant are taken to the City of Rittman Wastewater Treatment Plant. The animal solids collected from the preliminary screening effluent are collected in a dumpster and are taken to a landfill. The blood collected in the blood pit is hauled off site by a private company. The animal solids collected from processing are taken to a rendering facility.
- 8) During the inspection, the updated interior drain system was examined and revealed the following:
  - There are 3 drains in the wash down / processing area which drain to the north.
  - There are 6 drains in the older portion of the building in the rail cooler.
  - There are 3 drains in the newer portion of the building in the rail cooler.
  - Trench drains are located in the kill floor and drain to the wastewater treatment plant.

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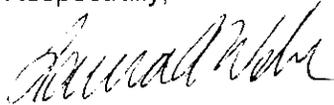
- There is a blood tank located in the shackle area. It is understood the blood goes to the blood pit during kill and the drain is switched over to the wastewater treatment plant discharge during clean up and processing.
- 9) A summary of the wastewater treatment plant discharge violations for the period of August 1, 2007 to May 1, 2009 has been attached to this letter. Please review all plant data to determine which violations are accurate or if there was a reporting error by the lab or our data collection program. Any reporting errors or eDMR errors must be reported to this office so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

This office has the following recommendations:

Submit a timeline for submitting the PTI for the Phase 2 wastewater treatment plant upgrades. Please be aware, this office requests the PTI be submitted no later than 60 days from the date of this letter.

If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.  
Environmental Engineer  
Division of Surface Water

LAW/mt

Enclosure: Violation List

cc: Dave Pitsenbarger  
Wayne County Health Department

File: Industrial/Permit Compliance/GoldenVeal

## Discharge Monitoring Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September2008	601	Biochemical OxygenDem	30D Qty	0.62	.72324	9/1/2008
September2008	601	Biochemical OxygenDem	1D Qty	0.94	.98432	9/19/2008
October 2008	601	Biochemical OxygenDem	30D Qty	0.62	.82	10/1/2008
November 2008	601	Biochemical OxygenDem	30D Conc	10	40.115	11/1/2008
November 2008	601	Biochemical OxygenDem	30D Qty	0.62	5.01056	11/1/2008
November 2008	601	Biochemical OxygenDem	1D Conc	15	64.05	11/14/2008
November 2008	601	Biochemical OxygenDem	1D Qty	0.94	8.00017	11/14/2008
November 2008	601	Biochemical OxygenDem	1D Conc	15	16.18	11/21/2008
November 2008	601	Biochemical OxygenDem	1D Qty	0.94	2.02096	11/21/2008
December 2008	601	Biochemical OxygenDem	30D Conc	10	17.52	12/1/2008
December 2008	601	Biochemical OxygenDem	30D Qty	0.62	2.18834	12/1/2008
December 2008	601	Biochemical OxygenDem	1D Conc	15	24.03	12/12/2008
December 2008	601	Biochemical OxygenDem	1D Qty	0.94	3.00147	12/12/2008
December 2008	601	Biochemical OxygenDem	1D Qty	0.94	1.3752	12/19/2008
January 2009	601	Biochemical OxygenDem	30D Conc	10	41.	1/1/2009
January 2009	601	Biochemical OxygenDem	30D Qty	0.62	4.14849	1/1/2009
January 2009	601	Biochemical OxygenDem	1D Conc	15	65.	1/9/2009
January 2009	601	Biochemical OxygenDem	1D Qty	0.94	7.10274	1/9/2009
January 2009	601	Biochemical OxygenDem	1D Conc	15	17.	1/22/2009
January 2009	601	Biochemical OxygenDem	1D Qty	0.94	1.19424	1/22/2009
February 2009	601	Biochemical OxygenDem	30D Conc	10	14.	2/1/2009
February 2009	601	Biochemical OxygenDem	30D Qty	0.62	1.37396	2/1/2009
February 2009	601	Biochemical OxygenDem	1D Conc	15	16.	2/19/2009
February 2009	601	Biochemical OxygenDem	1D Qty	0.94	1.99848	2/19/2009
March 2009	601	Biochemical OxygenDem	30D Conc	10	50.5	3/1/2009
March 2009	601	Biochemical OxygenDem	30D Qty	0.62	6.3077	3/1/2009
March 2009	601	Biochemical OxygenDem	1D Conc	15	79.	3/12/2009
March 2009	601	Biochemical OxygenDem	1D Qty	0.94	9.8675	3/12/2009
March 2009	601	Biochemical OxygenDem	1D Conc	15	22.	3/19/2009
March 2009	601	Biochemical OxygenDem	1D Qty	0.94	2.74791	3/19/2009
April 2009	601	Biochemical OxygenDem	30D Qty	0.62	1.12415	4/1/2009
April 2009	601	Biochemical OxygenDem	1D Qty	0.94	1.37396	4/16/2009
June 2008	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	1.605	6/1/2008
June 2008	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	.11523	6/1/2008
June 2008	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.1542	6/27/2008
August 2008	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	2.76	8/1/2008
August 2008	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	.09123	8/1/2008
August 2008	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	2.84	8/8/2008
August 2008	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	2.68	8/22/2008
September2008	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	1.835	9/1/2008
September2008	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	.2273	9/1/2008
September2008	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	2.78	9/12/2008
September2008	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.34724	9/12/2008
October 2008	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	3.96	10/1/2008

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2008	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	.49462	10/1/2008
October 2008	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	3.22	10/10/2008
October 2008	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.40219	10/10/2008
October 2008	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	4.7	10/17/2008
October 2008	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.58705	10/17/2008
January 2009	601	Nitrogen, Ammonia (NH3	30D Qty	0.19	.19319	1/1/2009
February 2009	601	Nitrogen, Ammonia (NH3	30D Conc	3	3.85	2/1/2009
February 2009	601	Nitrogen, Ammonia (NH3	30D Qty	0.19	.46215	2/1/2009
February 2009	601	Nitrogen, Ammonia (NH3	1D Conc	4	7.1	2/19/2009
February 2009	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	.88683	2/19/2009
March 2009	601	Nitrogen, Ammonia (NH3	30D Qty	0.19	.331	3/1/2009
March 2009	601	Nitrogen, Ammonia (NH3	1D Conc	4	4.8	3/12/2009
March 2009	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	.59954	3/12/2009