

Campbells Gold



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

Re: Henry County  
Campbell Soup Company  
NPDES Permit

March 25, 2008

Mr. Geoff Sans  
Manager, Services & Utilities  
Campbell Soup Supply Company  
12-773 State Route 110  
Napoleon, Ohio 43545

Dear Mr. Sans:

On February 25, 2008, Tanushree Courlas conducted an inspection at the Campbell Soup Company. Mr. Aaron McCoy and you were present and provided operation and maintenance information regarding the wastewater treatment plant. The Campbell Soup Company currently has an Ohio National Pollutant Discharge Elimination System (NPDES) (Number 2IH00021) permit. We received your complete NPDES permit renewal application on February 12, 2008. The inspection included a tour of the facility and completion of the enclosed inspection form.

**Compliance at the time of inspection**

During our visit, all major treatment units were in operation. The effluent was being discharged to the Maumee River. The final effluent was visually clear. Samples were not taken to verify compliance with permit limits.

**Violations since the last inspection**

Since the last inspection, there have been some permit limit violations. Mr. Mike Maringer, your operator of record, has provided written documentation explaining these violations.

**NPDES Renewal**

The next permit cycle will include language regarding the new Mercury monitoring requirements. You should receive a draft permit within the next few months. Please make any comments within the allotted time.

**Cooling Water Additive**

We briefly discussed the requirements of changing or adding new boiler water or cooling water treatment additive(s). Due to the nature of these additives, requests need to be made prior to changing or adding new additives to your process. Your NPDES permit Part II, Item F reads:

Mr. Geoff Sans  
March 25, 2008  
Page 2

*"In the event that the permittee's operation required the use of cooling or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the director of the Ohio EPA prior to use. Reporting and testing requirements to apply for permission to use additives can be obtained from the Ohio EPA, Central Office, Division of Surface Water, Water Resources Management Section. Reported information will be used to evaluate whether the use of the additive(s) at concentrations expected in the final discharge will be harmful or inimical to aquatic life."*

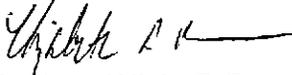
The Ohio Administrative Code Chapter 3745-33-07 reads in part:

*"The director shall establish permit conditions and/or other requirements for the additives or their ingredients that ensure that Ohio water quality standards are attained."*

In order to be in compliance with your NPDES permit, you must submit a request to change or add boiler water or cooling water treatment additives to our Columbus Office.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please call Tanushree Courlas at (419) 373-3053.

Yours truly,



Elizabeth A. Wick, P.E.  
District Engineer, Unit Supervisor  
Division of Surface Water

/llr

Enclosure

pc: Robert Zimmerman, Environmental Project Manager  
☛DSW-NWDO-File w/all enclosures☛

# NPDES COMPLIANCE INSPECTION REPORT

## Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
<u>2IH00021</u>	<u>OH0003298</u>	<u>08/02/25</u>	<u>S</u>	<u>S</u>	<u>1</u>

## Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Campbell Soup Supply, Co. 12-773 SR 110 Napoleon, Ohio 43545 Henry County	1300	January 1, 2004
	Exit Time	Permit Expiration Date
	1530	July 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mr. Geoff Sans, Manager - Services and Utilities	419-599-6637

Name, Address and Title of Responsible Official	Phone Number
Mr. Geoff Sans, Manager - Services and Utilities Campbell Soup Supply, Co. 12-773 SR 110 Napoleon, Ohio 43545	419-599-6637

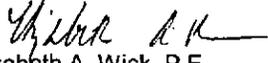
## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>N</u> Other
<u>S</u> Collection System		

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)


3-25-08  
Tanushree Courlas, Ohio EPA, Northwest  
 Name(s) and Signature(s) of Inspector(s) Date District Office


3/26/08  
Elizabeth A. Wick, P.E., Ohio EPA, Northwest  
 Name and Signature of Reviewer Date District Office

Sections E thru K: Complete on all inspections as appropriate. N/A - Not Applicable N/E - Not Evaluated

<b>Section E: Permit Verification</b>				
	Yes	No	N/A	N/E
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<u>X</u>	___	___	___
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	<u>X</u>	___	___	___
(c) PRODUCT(S) AND PRODUCTION RATES CONFORM WITH PERMIT APPLICATION (INDUSTRIES)	<u>X</u>	___	___	___
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT PERMIT APPLICATION/BRIEFING MEMO	<u>X</u>	___	___	___
(e) TREAT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION/BRIEFING MEMO	<u>X</u>	___	___	___
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION	___	<u>X</u>	___	___
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES	___	___	<u>X</u>	___
(h) ALL DISCHARGES ARE PERMITTED	<u>X</u>	___	___	___
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT	<u>X</u>	___	___	___

COMMENTS/STATUS:

<b>Section F: Compliance Schedules/Violations</b>				
	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE THE LAST INSPECTION	<u>X</u>	___	___	___
(b) PERMITTEE IS TAKING ACTIONS TO RESOLVE VIOLATIONS	<u>X</u>	___	___	___
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	___	___	<u>X</u>	___
(d) COMPLIANCE SCHEDULE CONTAINED IN <u>NPDES Permit</u>	___	___	<u>X</u>	___
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE	___	___	<u>X</u>	___

COMMENTS/STATUS:

Researching ways to remove ammonia - Poggemeyer to do a full study - the lagoons are still aerated. Some limit, code, and frequency violations.

**Section G: Operation and Maintenance**

**TREATMENT WORKS:**

	Yes	No	N/A	N/E
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED				
(a) STANDBY POWER AVAILABLE GENERATOR <u>  </u> DUAL FEED	<u>  </u>	<u>X</u>	<u>  </u>	<u>  </u>
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(d) SUFFICIENT OPERATING STAFF PROVIDED # SHIFTS <u>3</u> DAYS/WEEK <u>7</u>	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS REQUIRED BY PERMIT CLASS: <u>III</u> (Will be Class IV)	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(f) ROUTINE AND PREVENTIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(h) OPERATION AND MAINTENANCE MANUAL PROVIDED AND MAINTAINED	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION	<u>  </u>	<u>X</u>	<u>  </u>	<u>  </u>
(j) REGULATORY AGENCY NOTIFIED OF BYPASSES <u>  </u> ON MORS <u>  </u> 800 NO.	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECTION	<u>  </u>	<u>X</u>	<u>  </u>	<u>  </u>

**COLLECTION SYSTEM:**

	Yes	No	N/A	N/E
(a) PERCENT COMBINED SYSTEM <u>  </u> %				
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSO_ SSO_)	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(d) CSO O AND M PLAN PROVIDED AND IMPLEMENTED	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(g) LIFT STATION ALARM SYSTEMS PROVIDED AND MAINTAINED	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(h) ARE LIFT STATIONS EQUIPPED WITH PERMANENT STANDBY POWER OR EQUIVALENT	<u>  </u>	<u>X</u>	<u>  </u>	<u>  </u>
(i) IS THERE AN INFLOW INFILTRATION PROBLEM (SEPARATE SEWER SYSTEM) OR WERE THERE ANY MAJOR REPAIRS TO COLLECTION SYSTEM SINCE LAST INSPECTION	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(j) ANY COMPLAINTS RECEIVED SINCE LAST INSPECTION OF BASEMENT FLOODING	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	<u>  </u>	<u>  </u>	<u>X</u>	<u>  </u>

**COMMENTS/STATUS:**

Mike Merringer - Class IV, Shifts 1 and 2 = Class 1 each, Shift 3 = Class 3  
If power goes out, then plant is chut down = no discharge



**Part 2. Sampling**

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED BY PERMIT	<u>X</u>	___	___	___
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	<u>X</u>	___	___	___
(c) PERMITTEE USES REQUIRED SAMPLING METHOD	<u>X</u>	___	___	___
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE	<u>X</u>	___	___	___
(i) SAMPLES REFRIGERATED DURING COMPOSITING	<u>X</u>	___	___	___
(ii) PROPER PRESERVATION TECHNIQUES USED	<u>X</u>	___	___	___
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3	<u>X</u>	___	___	___
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records)	<u>X</u>	___	___	___
(f) ADEQUATE RECORDS MAINTAINED OF SAMPLING DATE, TIME, EXACT LOCATION, ETC.	<u>X</u>	___	___	___

COMMENTS/STATUS:

Samples sent to MASI/Alloway, Brookside (sludge)

**Part 3. Laboratory**

	Yes	No	N/A	N/E
<b>GENERAL</b>				
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)	<u>X</u>	___	___	___
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED	___	___	<u>X</u>	___
(c) ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT	___	<u>X</u>	___	___
(d) IF (c) IS YES, ARE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT	___	___	<u>X</u>	___
(e) COMMERCIAL LABORATORY USED	<u>X</u>	___	___	___
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB <u>pH, D.O., and Alkalinity - in house, sludge parameters - Brookside, rest of parameters - MASI/Alloway</u>				

(2) LAB NAME: MASI

**QUALITY CONTROL/QUALITY ASSURANCE**

(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED	<u>X</u>	___	___	___
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	<u>X</u>	___	___	___
(h) ADEQUATE RECORDS MAINTAINED	<u>X</u>	___	___	___
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM DATE : _____ <u>X</u> SATISFACTORY ___ MARGINAL ___ UNSATISFACTORY				

COMMENTS/STATUS:

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**Section J: Effluent/Receiving Water Observations**


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OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
001	None	None	None	None	None	Clear	

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COMMENTS/STATUS:

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**Section K: Multimedia Observations**


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	Yes	No	N/A	N/E
(a) ARE THERE INDICATIONS OF SLOPPY HOUSEKEEPING OR POOR MAINTENANCE IN WORK AND STORAGE AREAS OR LABORATORIES	___	<u>X</u>	___	___
(b) DO YOU NOTICE STAINING OR DISCOLORATION OF SOILS, PAVEMENT, OR FLOORS	___	<u>X</u>	___	___
(c) DO YOU NOTICE DISTRESSED (UNHEALTHY, DISCOLORED, DEAD) VEGETATION	___	<u>X</u>	___	___
(d) DO YOU SEE UNIDENTIFIED DARK SMOKE OR DUSTCLOUDS COMING FROM SOURCES OTHER THAN SMOKESTACKS	___	<u>X</u>	___	___
(e) DO YOU NOTICE ANY UNUSUAL ODORS OR STRONG CHEMICAL SMELLS	___	<u>X</u>	___	___
(f) DO YOU SEE ANY OPEN OR UNMARKED DRUMS, UNSECURED LIQUIDS, OR DAMAGED CONTAINMENT FACILITIES?	___	<u>X</u>	___	___

IF ANY OF THE ABOVE ARE OBSERVED, ASK THE FOLLOWING QUESTIONS:

- (1) WHAT IS THE CAUSE OF THE CONDITION?
- (2) IS THE OBSERVED CONDITION OR SOURCE A WASTE PRODUCT?
- (3) WHERE IS THE SUSPECTED CONTAMINANT NORMALLY DISPOSED?
- (4) IS THIS DISPOSAL PERMITTED?
- (5) HOW LONG HAS THE CONDITION EXISTED AND WHEN DID IT BEGIN?

COMMENTS/STATUS:

## F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	Company has their own water treatment plant
	Safety Features	S	
	Bypasses	---	Bypass available for units in parallel and in re-circulation valve
	Stormwater Overflows	---	Parking Lot stormwater run off pumped to lagoon
	Alternate Power Source	---	WWTP shuts down during power outage
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	3 influent grinder pumps
	Ventilation	---	
	Bar Screen	IN	1 unit
	Disposal of Screenings	S	landfill
	Comminutor	---	
	Grit Chamber	IN	1 unit
	Disposal of Grit	S	landfill
Primary	Settling Tanks		
	Scum Removal		
	Sludge Removal	IN	to digester
	Effluent	S	
	Primary DAF's	IN	3 units, #1, #2, & #3
Sludge Disposal	Digsters	IN	2 anaerobic, 1 sludge storage tank
	Temperature and pH	S	
	Gas Production	IN	Study being done for the use of methane gas in the facility
	Heating Equipment	IN	
	Sludge Pumps	IN	6 into digester; 3 out to sludge holding tank or 5 sludge storage lagoons
	Drying Beds		
	Vacuum Filter		
	Disposal of Sludge	S	Land apply; lagoons have storage for 1 year (Bob Schwab/Millers)
Other	Sludge Holding Tank	IN	1 unit
	Flow Meter and Recorder	IN	
	Records		
	Lab Controls	S	
Secondary-Tertiary List items as	Chemical Treatment	IN	Polymer 71303 feed in the final DAF tanks, installed on 12/12/2005 for BOD removal
	Roughing Towers	IN	2 units
	Settling Tanks	IN	2 units
	Trickling Filters	IN	2 primary units and 2 secondary units
	Aerated Lagoon	IN	Research being conducted to treat high ammonia levels.
	Final DAF's	IN	2 units #2 and #5
Disinfection	Spray Irrigation	OUT	Used in summer during peak flow months for vegetable wash waster and some process water (mid-July)
	Effluent	S	Clear
	Disinfection System	OUT	Out for season
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
Dechlorination	OUT	Out for season	