



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Henry County  
Campbell Soup Company  
NPDES Permit

October 7, 2008

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

Dear Mr. Sans:

On August 27 2008, a compliance inspection was conducted at the Campbell Soup Supply Company's Napoleon Plant by Mr. Dave Barna and Ms. Anne Marie Vincent, US EPA. Representatives of Campbells included Mr. Bob Shober, Director of Infrastructure Engineer, Campbells World Headquarters New Jersey, Mr. Aaron McCoy, Chemist, Mr. Mike Maringer, Technical Specialist of Industrial Fluid Management, Inc. and yourself. I was in attendance representing Ohio EPA.

During this inspection, Campbell's increasing frequency of Ammonia violations was discussed and attributed to an increase in production of vegetable/fruit drinks (Fusion and Spalsh). Campbells contracted with Poggemeyer Design Group to look into this issue and prepare a plan. This plan was shared with us during the inspection. This plan was recently revised to include the effect of the new beverage waste stream.

We were told that the higher sugar content in the wastewater produces more biosolids production in the trickling filters which then collects in the aerated lagoon. During the summer months the increased biosolids in this unit lead to the ammonia violations. Last year the aerated lagoon was taken off line at a cost of \$750,000 dollars and the biosolids removed. Within a month the aerated lagoon was again filled with biosolids. Although Campbells had been proactive in the addition of diffused aerators into the aerated lagoon, it was determined that it would cost an additional \$250,000 a month to operate enough aerators to treat the increased wastewater load resulting from the beverage line.

Instead of increasing aeration in the basin, Poggemeyer's plan proposes to install settling tanks after the trickling filters, eliminating the aerated lagoon and installing aeration into the final DAF tanks. In addition, the plan considers different options for management of the biosolids in compliance with 503 biosolid regulations.

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From our discussion, we understand that Campbells was collecting additional cost data which would facilitate the preparation of a schedule of compliance. We discussed the need to include this schedule of compliance in your current NPDES permit renewal. Please submit to Ohio EPA your proposed schedule of compliance, to address your increased frequency of ammonia violations, and a copy of the engineering plan.

Mr. Tom Poffenbarger, Ohio EPA Northwest District Office, will be drafting your NPDES permit with the assistance of Mr. Raj Chakrabarti, Ohio EPA Central Office. You can reach them respectively at [tom.poffenbarger@epa.state.oh.us](mailto:tom.poffenbarger@epa.state.oh.us) (419)373-3008 and [raj.chakrabarti@epa.state.oh.us](mailto:raj.chakrabarti@epa.state.oh.us) (614)644-2027.

Yours truly,

  
Dana Martin-Hayden  
Division of Surface Water

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pc: ~~DSWINWDO~~ File  
DSW CO, Raj Chakrabarti  
Dave Barna, US EPA, Cleveland Field Office  
Anne Marie Vincent, US EPA, Cleveland Field Office