



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

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

Re: Henry County  
Cloverleaf Cold Storage  
Indirect Discharge Permit

June 3, 2010

Mr. Dale Lilleholm, General Manager  
Cloverleaf Cold Storage  
1165 Independence Drive  
Napoleon, Ohio 43545

Dear Mr. Lilleholm:

On May 19, 2010, I conducted an inspection at Cloverleaf Cold Storage. You, Mr. Joe Ogan and Ms. Ester Flores were present and provided information regarding industrial wastewater discharges to the City of Napoleon sanitary sewer system. Cloverleaf Cold Storage is considered a significant industrial user as defined in Ohio Administrative Code (OAC) 3745-36-02 and has an Ohio Indirect Discharge Permit (number 2DP00061).

Since the last inspection, an automatic sampler was installed. The sampler is housed in a building over a manhole, which is located due east of the northwest corner of your facility. The discharge to the city is estimated using the city water usage logs. From my observations, the City of Napoleon should have access to this manhole. In addition, there was a very thick film of oil and grease coating the inside of this manhole and it extended at least 3-4 feet above the pipe inverts. The amount and height of the oil and grease in this manhole causes me concern that very large volumes of water and grease are being released to the City of Napoleon sewer system. Clean the Manhole of all grease and inspect the manhole weekly to determine if high flows, high concentrations or blockages are contributing to this thick coating of grease in the manhole. The drains in the facility I inspected were screened and they appeared to be clean. Mr. Ogan stated that screens on the floor drains are cleaned several times a day and during the third shift which does clean up.

During our visit, a review of wastewater generating processes was conducted. You stated that approximately 30,000 to 40,000 gallons of wash water are produced when the plant is processing 30,000 lbs. of meat, which is the size of a typical load. You stated that September through December you receive approximately 3 loads and January through July you receive 1.5 loads per day.



Mr. Dale Lilleholm, General Manager  
June 3, 2010  
Page 2

In addition to the temper process water, the plant generates 2000-3000 gallons per day of clean up water and 5000 gallons of cooling tower blow down water.

An operations and maintenance manual is now on site. The manual has been sent to our office and includes procedures for cleaning the manhole and avoiding discharges during rain, since the City of Napoleon has combined sewer overflows (CSOs) prior to their wastewater treatment plant. During our inspection, you stated that rain has no effect on your operation. Please note this is not the case. It is very important to prevent discharges from your facility from reaching the Maumee River. Within 60 days, submit a revised operations and maintenance plan that includes your procedures and methods for communicating with the City of Napoleon WWTP in regards to minimizing your impact during CSO discharging events.

During our visit, we found that Cloverleaf Cold Storage has been monitoring all the parameters required under the Indirect Discharge Permit issued by Ohio EPA, however, due to a personnel change, the corporate office has not been submitting the data into the eDMR system, which is a violation of the indirect discharge permit. Another error is that all the samples have been taken as composite samples. The oil and grease test and the pH test should be taken as grab samples as indicated in the permit. Very high values for oil and grease once the sampler was installed may have been beneficial in indicating that oil and grease values from this facility vary greatly during the day and very high volumes are being released to the City of Napoleon. In addition, the placement of the automatic sampler probe was well below the sewer line water surface and oil and grease should have been more difficult to pick up. At the time of our visit, the discharge at the manhole where sampling takes place appeared to have a slight grey color; however, no samples were taken at that time.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please call Dana Martin-Hayden of our office at (419) 373-3067.

Sincerely,



Dana Martin-Hayden  
Environmental Specialist II  
Division of Surface Water

/llr

pc: Matt Bilow, City of Napoleon, attachment  
Ryan Laake, DSW-CO, attachment  
DSW-NWDO File, attachment

# IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry: <b>Cloverleaf Cold Storage, 1165 Independence Drive, Napoleon, Ohio 43545</b>	
Date of visit: <b>05/19/10</b>	Time of visit: <b>13:27-14:54</b>
Name(s) of inspector(s) <b>Dana Martin-Hayden</b>	
Provide Name(s) and titles(s) of industry representative(s):	
Name	Title
<b>Dale Lilleholm</b>	<b>General Manager</b>
<b>Joe Ogan</b>	<b>Manager</b>
<b>Ester Flores</b>	<b>Office Manager</b>
Classification assigned by CA: <b>Significant Industrial User</b>	
Did the CA inspector review/obtain the following as part of the industrial inspection?	
<ol style="list-style-type: none"> <li>1. Description of the products manufactured or the services provided by the IU.</li> <li>2. Verification of the IU's classification or discussion of any changes.</li> <li>3. Description of any significant changes in processes or flow.</li> <li>4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.)</li> <li>5. Description of the sample location and any differences in Ca and IU locations.</li> <li>6. Description of the treatment system which is in place.</li> <li>7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention.</li> <li>8. Discussion regarding whether hazardous wastes are stored or discharge and any related problems.</li> </ol>	
Notes:	
<p><b>Approximately 2000 gallons of wash/clean-up water is generated daily.</b></p> <p><b>Approximately 5000 gallons of cooling tower blowdown water is discharged daily.</b></p> <p><b>Seasonal meat (ham) tempering results in the daily discharge of wastewater during September to December and March to April.</b></p>	

(revised November 1996)

**IU SITE VISIT DATA SHEET (Continued)**IU Name: **Cloverleaf Cold Storage**Date: **05/27/10**

## Notes:

Approximately 30,000 to 40,000 gallons of wash water is produced when processing 30,000 lbs of meat, which is the size of a typical load.

September through December you receive approximately 3 loads and January through July you receive 1.5 loads per day.

In addition to the temper process water, you generate 2000-3000 gallons per day of clean up water and 5000 gallons of cooling tower blow down water.

Clean the Manhole of all grease and inspect the manhole weekly to determine if high flows, high concentrations or blockages are contributing to coating of grease in the manhole.

Operator should start keeping a calibration log for the pH probe, in accordance with manufactures guidelines.

Manual for procedure to avoid discharge during rain, keeping solids out of sewer system and cleaning of manhole. Facility stated that rain has no effect on your operation, however, this is not the case it is extremely important discharges of waste water reaching the Maumee River are minimized. O and M plan should be revised with procedures and methods for communicating with the City of Napoleon WWTP in regards to minimizing impact to river during CSO discharging events.

Due to a personnel change, their corporate office has been responsible for entering sampling data into the eDMR system. I reviewed the data during my inspection and monitoring did occur during the 2008 and 2009, although not all the data was submitted to Ohio EPA as required by the permit. This is a violation of your Indirect Discharge Permit.

All the samples have been taken as composites. The oil and grease test and the pH test should be taken as grab samples as indicated in your permit. Very high values for oil and grease once the sampler was installed may have been beneficial in indicating that oil and grease values from this facility vary greatly during the day and very high volumes are being released to the City of Napoleon.

Since the last inspection, an automatic sampler has been installed and is housed over a manhole, which is located due east of the northwest corner of your facility. From my observations, I am concerned that the City of Napoleon does not have access to this manhole. In addition, there was a very thick film of oil and grease coating the inside of this manhole and it extended at least 3-4 feet above the pipe inverts.

**INDUSTRIAL USER INSPECTION CHECKLIST**

Facility:	<b>Cloverleaf Cold Storage</b>	Date of inspection:	<b>05/19/10</b>
OH Number:	<b>OHP000052</b>	IDP Number:	<b>2DP00061</b>
Facility Representative:	<b>Dale Lilleholm, Joe Ogan</b>	Inspector(s):	<b>Dana Martin-Hayden</b>

**COMPLIANCE**

- |   |         |
|---|---------|
| 1. Date of last pretreatment inspection:  | 05/6/08 |
| 2. Has the facility been in compliance with its permit limits since the last inspection?<br>If no, explain: | N       |

*Due to a personnel change, their corporate office has been responsible for entering sampling data into the eDMR system. I reviewed the data during my inspection and monitoring did occur during the 2008 and 2009, although not all the data was submitted to Ohio EPA as required by the permit. This is a violation of your Indirect Discharge Permit.*

- |   |    |
|---|----|
| 3. Is the facility in compliance with all other requirements? | Y  |
| Sampling procedures   | Y  |
| Reporting (late reporting, failure to report, etc)            | N  |
| Compliance schedules  | NA |
| Submitted BMR and 90 day compliance reports                   | NA |
| Any other requirements  | NA |

If any of the above five answers is no, explain:

*Due to a personnel change, their corporate office has been responsible for entering sampling data into the eDMR system. I reviewed the data during my inspection and monitoring did occur during the 2008 and 2009, although not all the data was submitted to Ohio EPA as required by the permit. This is a violation of your Indirect Discharge Permit.*

*All the samples have been taken as composites. The oil and grease test and the pH test should be taken as grab samples as indicated in your permit. Very high values for oil and grease once the sampler was installed may have been beneficial in indicating that oil and grease values from this facility vary greatly during the day and very high volumes are being released to the City of Napoleon.*

- |  |   |
|--|---|
| 4. Was the facility required to perform any actions as a result of the last inspection?<br>Explain any unresolved actions: | Y |
|--|---|

*Yes, they were reminded to conduct composite and grab samples as appropriate. They did not accomplish this although they did install an automatic sampler for composite samples. However, they used the automatic sampler for grabs too.*

**FACILITY OPERATIONAL CHARACTERISTICS**

- |  |                          |
|--|--------------------------|
| 5. Number of Employees: <b>60-80</b>                                     | 6. Shifts/Day: <b>2</b>  |
| 7. Production Days/Year: <b>5 – 5.5 Days/Week</b>                        | 8. Hours/shift: <b>8</b> |
| 9. Any production changes since the last inspection?<br>If yes, explain: | N                        |

10. General facility description and operations:  
**Packaging, blast freezing, storage, and tempering of fresh meat.**  
**Non-contact tempering (installed 1999) flow range 120000-200000 gpd.**  
**Wash Water (installed 2004) flow is 2000 gpd.**  
**10% wastewater is from contact tempering of pork bellies.**

- |   |   |
|---|---|
| 11. Any change in materials used in production since the last inspection?<br>If yes, explain: | N |
| 12. Any expansion or production increase expected within the next year?<br>If yes, explain:   | N |

<b>WASTEWATER TREATMENT</b>
-----------------------------

- |   |                                  |
|---|----------------------------------|
| 13. Provide a schematic diagram and description of the wastewater treatment system:<br><br><b>No treatment.</b>   |                                  |
| 14. Was a PTI issued for the treatment system?  | N/A                              |
| 15. Were there any modifications to the treatment system since the previous inspection?<br><br>If yes, was a PTI obtained?  | N/A<br><br>N/A                   |
| PTI Number:   | Date:                            |
| 16. What is the treatment mode of operation?<br><br>If batch, list the frequency and duration:  | Batch / Continuous / Combination |
| 17. Who is responsible for operating the treatment system?  |                                  |
| 18. How often is the treatment system checked?  |                                  |
| 19. Is there an alarm system for the system?<br>Explain:  | N/A                              |
| 20. Is there an operations and maintenance manual?  | Y                                |
| <i>Facility has written manual for procedure to avoid discharge during rain, keeping solids out of sewer system and cleaning of manhole. Facility stated that rain has no effect on their operation, however, this is not the case it is extremely important discharges of waste water reaching the Maumee River are minimized. O and M plan should be revised with procedures and methods for communicating with the City of Napoleon WWTP in regards to minimizing impact to river during CSO discharging events.</i> |                                  |
| 21. Is an inventory of critical spare parts maintained?<br>If yes, list:  | N/A                              |
| 22. Are there any bypasses in the system?<br>If yes, describe the location:   | N/A                              |
| Have bypasses occurred since the last inspection?   | N/A                              |
| Was the POTW notified?  | N/A                              |

**WASTEWATER TREATMENT CONTINUED**

23. Are residuals or sludges generated? Y

Method of disposal:

*Fats and Solids are taken to Wapokeneta for rendering.*

Frequency and amount of disposal:

Name of hauler/landfill/disposal facility:

Is any sludge generated subject to RCRA regulations? N/A

If land applying sludge, is there a sludge management plan? N/A

**PROCESS AND WASTEWATER INFORMATION**

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Contact Meat Tempering			14-23,000		
2. Wash Water			3-5000		
3. Cooling Water Blowdown			3-5000		
4. Non-contact meat tempering			80-90,000		
5.					
6.					
7.					
8.					
9.					
10.					
<b>Total Regulated Process Flow</b>					
<b>Non-contact Cooling</b>					
<b>Blowdown</b>					
<b>Reverse Osmosis Condensate</b>					
<b>Demineralizer Regeneration</b>					
<b>Filter Backwash</b>					
<b>Compressor Condensate</b>					
<b>Storm Water</b>					
<b>Other Dilute Flows</b>					
<b>Unregulated Flows (provide list)</b>					
<b>Sanitary</b>					
<b>TOTAL FLOW</b>			500-700 cubic ft/mo		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).  
*All flow discharges to POTW*

**SELF MONITORING**

26. Sample location(s) described in the facility's permit:

*Since the last inspection, an automatic sampler has been installed and is housed over a manhole, which is located due east of the northwest corner of your facility. From my observations, I am concerned that the City of Napoleon does not have access to this manhole. In addition, there was a very thick film of oil and grease coating the inside of this manhole and it extended at least 3-4 feet above the pipe inverts.*

27. Is the facility sampling at the location(s) described in the permit? Y  
If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? Y  
If no, indicate a representative location:

*In addition, the placement of the automatic sampler probe was well below the sewer line water surface and oil and grease should have been more difficult to pick up.*

29. Is the flow measured or estimated? Measured / Estimated

If measured, how often is the meter calibrated?

*Although operator able to reference the meter calibration directions, there is no log to document that the meter is being calibrated and dates when the standards are be changed.*

If estimated, describe method of estimation:

**Water Usage Bills**

30. Is pH monitored continuously? N  
If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? Y  
If no, specify the sample collector:

32. Are appropriate sampling procedures followed? N  
Monitoring frequencies N  
Sample collection (grab for pH, O&G) Y  
Flow proportioned samples Y  
Proper preservation techniques Y  
Sample holding times Y  
Chain-of-custody forms Y

**Constant volume taken ever 30 minutes**

33. Are samples analyzed in accordance with 40 CFR 136? Y

34. Laboratory conducting analyses:

**Jones and Henry**

**TOXICS MANAGEMENT**

35. Are any listed toxic organics used in the facility?  
If yes, identify organics: N
36. Does the facility have a current toxic organic management plan(TOMP)?  
If yes, is it being implemented? N  
N/A
37. Has the facility had any uncontrolled releases or spills to the POTW since  
the previous inspection? If yes, please explain: N
38. Does the facility need a spill prevention plan or slug discharge control plan?  
If yes, does the facility have a written plan? N  
N/A
39. Identify any potential slug load or spill areas:

*Manhole outside production area has overflowed in the past.*

**REQUIRED FOLLOW-UP ACTIONS**

**Clean the Manhole of all grease and inspect the manhole weekly to determine if high flows, high concentrations or blockages are contributing to coating of grease in the manhole.**

**Operator should start keeping a calibration log for the pH probe, in accordance with manufactures guidelines.**

**O and M plan should be revised with procedures and methods for communicating with the City of Napoleon WWTP in regards to minimizing impact to river during CSO discharging events.**

**Samples should be taken as composite or grab as specified in the indirect discharge permit.**

**Clean the Manhole of all grease and inspect the manhole weekly to determine if high flows, high concentrations or blockages are contributing to this thick coating of grease in the manhole.**

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
2DP00061*AP	March 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	03/11/2008
2DP00061*AP	March 2008	001	00530	Total Suspended Solids	1/2Weeks	1	0	03/25/2008
2DP00061*AP	March 2008	001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	03/25/2008
2DP00061*AP	March 2008	001	00665	Phosphorus, Total (P)	1/2Weeks	1	0	03/25/2008
2DP00061*AP	March 2008	001	00400	pH	1/2Weeks	1	0	03/25/2008
2DP00061*AP	March 2008	001	00310	Biochemical Oxygen Dem	1/2Weeks	1	0	03/25/2008
2DP00061*AP	March 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	03/25/2008
2DP00061*AP	April 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	04/08/2008
2DP00061*AP	April 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	04/22/2008
2DP00061*AP	May 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	05/06/2008
2DP00061*AP	May 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	05/20/2008
2DP00061*AP	June 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	06/03/2008
2DP00061*AP	June 2008	001	00530	Total Suspended Solids	1/2Weeks	1	0	06/17/2008
2DP00061*AP	June 2008	001	00610	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	06/17/2008
2DP00061*AP	June 2008	001	00665	Phosphorus, Total (P)	1/2Weeks	1	0	06/17/2008
2DP00061*AP	June 2008	001	00400	pH	1/2Weeks	1	0	06/17/2008
2DP00061*AP	June 2008	001	00310	Biochemical Oxygen Dem	1/2Weeks	1	0	06/17/2008
2DP00061*AP	June 2008	001	00550	Oil and Grease, Total	1/2Weeks	1	0	06/17/2008