



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: Mercer County
The Fremont Company
IDP Inspection

June 29, 2008

Mr. James Fox, Manager
The Fremont Company
802 N. Front Street
Fremont, Ohio 43420

Dear Mr. Fox:

On March 10, 2010, an inspection was made of the pretreatment facilities serving The Fremont Company Rockford Plant. Mr. Jim Gibson, Mr. Joe Reynolds and you were present and provided information and a tour of the facility.

We are in receipt of your self-monitoring reports covering the months of January 2008 through December 2009. Our review indicates violations of the limits established in your Indirect Discharge Permit and these violations are attached to this letter.

You continue to work with the Village of Rockford to try and determine if an upgrade to their treatment system would be adequate to bring you into compliance with the limits in your permit. We are currently evaluating how your limits would be affected by an upgrade to the Rockford plant. Once we have established what these limits will be, you will have 30 days to notify this office of how you intend to proceed including a definitive schedule of when your facility will come into compliance. If we do not receive this information and see movement towards compliance in a timely manner we will have no choice but to refer your facility for enforcement.

Our completed inspection report is enclosed for your records. If you have any questions, please feel free to call me at (419) 373-3019.

Sincerely,

Michelle M. Sharp
Division of Surface Water

/lb

Enclosure

pc: ~~NWDO-File--w/enclosures~~
Ryan Laake, DSW, CO - w/enclosures
Jim Gibson, Plant Manager, The Fremont Company Rockford Plant - w/enclosures

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
1/9/2008	002	00402	pH, Minimum	1D Conc	5.0	4.45
1/23/2008	002	00402	pH, Minimum	1D Conc	5.0	3.83
1/29/2008	002	00402	pH, Minimum	1D Conc	5.0	4.03
2/5/2008	002	00402	pH, Minimum	1D Conc	5.0	4.31
2/19/2008	002	00402	pH, Minimum	1D Conc	5.0	4.58
3/6/2008	002	80082	CBOD 5 day	1D Conc	3800	3940.
3/6/2008	002	00402	pH, Minimum	1D Conc	5.0	4.49
3/17/2008	002	00402	pH, Minimum	1D Conc	5.0	4.8
4/1/2008	002	00402	pH, Minimum	1D Conc	5.0	4.7
4/16/2008	002	80082	CBOD 5 day	1D Conc	3800	4110.
4/16/2008	002	00402	pH, Minimum	1D Conc	5.0	4.66
4/28/2008	002	00402	pH, Minimum	1D Conc	5.0	4.88
5/12/2008	002	00402	pH, Minimum	1D Conc	5.0	4.9
5/28/2008	002	00402	pH, Minimum	1D Conc	5.0	4.89
6/12/2008	002	00530	Total Suspended Solids	1D Conc	800	1080.
6/12/2008	002	80082	CBOD 5 day	1D Conc	3800	6660.
6/12/2008	002	00402	pH, Minimum	1D Conc	5.0	4.32
7/18/2008	002	00402	pH, Minimum	1D Conc	5.0	4.95
8/5/2008	002	00530	Total Suspended Solids	1D Conc	800	840.
8/18/2008	002	00530	Total Suspended Solids	1D Conc	800	960.
9/15/2008	002	80082	CBOD 5 day	1D Conc	3800	4330.
12/29/2008	002	00402	pH, Minimum	1D Conc	5.0	4.78
3/9/2009	002	00402	pH, Minimum	1D Conc	5.0	4.7
3/23/2009	002	00402	pH, Minimum	1D Conc	5.0	4.4
4/6/2009	002	80082	CBOD 5 day	1D Conc	2160	2570.
4/6/2009	002	00402	pH, Minimum	1D Conc	5.0	4.57
4/20/2009	002	80082	CBOD 5 day	1D Conc	2160	2250.
4/20/2009	002	00402	pH, Minimum	1D Conc	5.0	4.45
4/28/2009	002	80082	CBOD 5 day	1D Conc	2160	2420.
4/28/2009	002	00402	pH, Minimum	1D Conc	5.0	4.31
5/4/2009	002	80082	CBOD 5 day	1D Conc	2160	2650.
5/4/2009	002	00402	pH, Minimum	1D Conc	5.0	4.44
5/18/2009	002	80082	CBOD 5 day	1D Conc	2160	2350.
5/18/2009	002	00402	pH, Minimum	1D Conc	5.0	4.3
5/26/2009	002	00402	pH, Minimum	1D Conc	5.0	4.3
6/1/2009	002	00402	pH, Minimum	1D Conc	5.0	4.31
6/15/2009	002	00530	Total Suspended Solids	1D Conc	490	540.
6/15/2009	002	80082	CBOD 5 day	1D Conc	2160	2780.
6/15/2009	002	00402	pH, Minimum	1D Conc	5.0	4.36
6/29/2009	002	00530	Total Suspended Solids	1D Conc	490	620.
6/29/2009	002	80082	CBOD 5 day	1D Conc	2160	3230.
6/29/2009	002	00402	pH, Minimum	1D Conc	5.0	4.45
7/13/2009	002	00402	pH, Minimum	1D Conc	5.0	4.65
7/27/2009	002	00402	pH, Minimum	1D Conc	5.0	4.41
8/10/2009	002	80082	CBOD 5 day	1D Conc	2160	2520.
8/10/2009	002	00402	pH, Minimum	1D Conc	5.0	4.21
8/25/2009	002	00402	pH, Minimum	1D Conc	5.0	4.54
9/9/2009	002	00402	pH, Minimum	1D Conc	5.0	4.41
9/22/2009	002	00402	pH, Minimum	1D Conc	5.0	4.5
10/6/2009	002	00402	pH, Minimum	1D Conc	5.0	4.46
10/20/2009	002	00402	pH, Minimum	1D Conc	5.0	4.72
11/3/2009	002	00402	pH, Minimum	1D Conc	5.0	4.7
11/17/2009	002	00402	pH, Minimum	1D Conc	5.0	4.54
12/1/2009	002	00402	pH, Minimum	1D Conc	5.0	4.5
12/15/2009	002	00402	pH, Minimum	1D Conc	5.0	4.3
12/29/2009	002	00530	Total Suspended Solids	1D Conc	490	605.
12/29/2009	002	80082	CBOD 5 day	1D Conc	2160	3870.
12/29/2009	002	00402	pH, Minimum	1D Conc	5.0	4.4



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME The Fremont Company Rockford Plant		PERMIT NUMBER 2DP00082	FACILITY NUMBER
INSPECTION TYPE P	INSPECTOR M.Sharp	FACILITY TYPE 2	DATE CONDUCTED March 10, 2010

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY The Fremont Company Rockford Plant 150 Hickory Street Rockford, Ohio 45882
MAILING ADDRESS OF FACILITY The Fremont Company 802 North Front Street Fremont, Ohio 43420
CONTACT (NAME/TITLE/PHONE) Mr. Jim Gibson / Plant Manager / 419-363-2924 Ext. 108

FACILITY EVALUATION													
(S = Satisfactory, M = Marginal, U = Unsatisfactory NE = Not Applicable)													
<table border="1"> <tr><td>NA</td><td>Pretreatment</td></tr> <tr><td>S</td><td>Site/Facility Review</td></tr> <tr><td> </td><td> </td></tr> </table>	NA	Pretreatment	S	Site/Facility Review			<table border="1"> <tr><td>S</td><td>Chemical Storage</td></tr> <tr><td>M</td><td>Self Monitoring</td></tr> <tr><td> </td><td> </td></tr> </table>	S	Chemical Storage	M	Self Monitoring		
NA	Pretreatment												
S	Site/Facility Review												
S	Chemical Storage												
M	Self Monitoring												
* See inspection letter													

Names(s) and Signature(s) of Inspector(s)	Agency / Office / Telephone	Date
Michelle Sharp	Ohio EPA/NWDO/419-373-3019	
		6-29-10
Signature of Reviewer		Date
	Ohio EPA/NWDO/419-373-3002	
Elizabeth A. Wick, P.E.		6/25/10

INDUSTRIAL USER INSPECTION CHECKLIST

Facility:	The Fremont Company Rockford Plant	Date of inspection: March 10, 2010
OH Number:	OHP000226	IDP Number: 2DP00082
Facility Representative:	Mr. Jim Gibson & Mr. Joe Reynolds	Inspector(s): Ms. Michelle Sharp

COMPLIANCE

1. Date of last pretreatment inspection: January 6, 2008

2. Has the facility been in compliance with its permit limits since the last inspection? Y
 If no, explain:
Has been in compliance 90% of the time

3. Is the facility in compliance with all other requirements? Y

Sampling procedures	Y
Reporting (late reporting, failure to report, etc)	Y
Compliance schedules	N
Submitted BMR and 90 day compliance reports	NA
Any other requirements	NA

If any of the above five answers is no, explain:
The facility has still not come into compliance with the final limits.

4. Was the facility required to perform any actions as a result of the last inspection? N
 Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

- | | |
|-------------------------------------|--------------------------------|
| 5. Number of Employees: <u>50</u> | 6. Shifts/Day: <u>3 Shifts</u> |
| 7. Production Days/Year: <u>270</u> | 8. Hours/shift: <u>8 Hour</u> |
9. Any production changes since the last inspection? Y
 If yes, explain:
Overall increase of production

 10. General facility description and operations:
Food processing plant (tomato ketchup and BBQ sauce), heated cooking & packaging, and warehousing.

 11. Any change in materials used in production since the last inspection? Y
 If yes, explain:
Added liquid sucrose

 12. Any expansion or production increase expected within the next year? Y
 If yes, explain:

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:
14. Was a PTI issued for the treatment system? NA
15. Were there any modifications to the treatment system since the previous inspection? N
If yes, was a PTI obtained? NA
PTI Number: _____ Date: _____
16. What is the treatment mode of operation? NA
If batch, list the frequency and duration:
17. Who is responsible for operating the treatment system? NA
18. How often is the treatment system checked? NA
19. Is there an alarm system for the system? NA
Explain:
20. Is there an operations and maintenance manual? NA
21. Is an inventory of critical spare parts maintained? NA
If yes, list:
22. Are there any bypasses in the system? N
If yes, describe the location:
- Have bypasses occurred since the last inspection? NA
- Was the POTW notified? NA

WASTEWATER TREATMENT CONTINUED

23. Are residuals or sludges generated? N

Method of disposal:

Frequency and amount of disposal:

Name of hauler/landfill/disposal facility:

Is any sludge generated subject to RCRA regulations? NA

If land applying sludge, is there a sludge management plan? NA

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. East		47000	50,000		
2. West		8300	6,000		
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow		55300	55300		
Non-contact Cooling					
Blowdown					
Boiler Condensate		40% of	East Flow		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary		50 People	2 Sanitary Lines		
TOTAL FLOW					

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

SELF MONITORING

26. Sample location(s) described in the facility's permit: East Manhole & West Manhole
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:
29. Is the flow measured or estimated? Measured
If measured, how often is the meter calibrated? Once per year

If estimated, describe method of estimation:
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? Y
Monitoring frequencies Y
Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium) Y
Flow proportioned samples NA
Proper preservation techniques Y
Sample holding times Y
Chain-of-custody forms Y
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? | NA
NA |
| 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
NA |
| 39. Identify any potential slug load or spill areas: | |

REQUIRED FOLLOW-UP ACTIONS