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WYANDOT | ENDRES PROCESSING OHIO LLC | 2GR01582 2009/09/16 | HABLITZEL, LYNETTE | UPPER SANDUS



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: Wyandot County
Endres Processing LLC
Storm Water
Industrial

September 16, 2009

Mr. Paul Curtis, Chief Operating Officer
Endres Processing LLC
13420 Courthouse Boulevard
Rosemount, Minnesota 55068-3113

Dear Mr. Curtis:

On August 24, 2009, Walter Ariss and I inspected the Endres facility at 7300 State Route 199, Upper Sandusky, Ohio (photos taken). Endres dries waste bakery products such as cookies, cereals and snack foods so they can be used as an animal feed supplement. The inspection was to assess the facility's progress in implementing the Stormwater Management Program Development and Implementation Plan submitted in July 2008. The facility operates under the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity, Facility ID No. 2GR01582. Mike Bishop, Plant Manager, was present to provide information.

Storm Water Pollution Prevention Plan (SWP3) – A SWP3 had been developed for the facility and was available. The document did list the pollution prevention team, materials onsite, and have a site map. Employee training had only recently been performed within the past couple of days. A brief review of the SWP3 indicated some deficiencies, such as: the document was not signed (*This is a violation of Part VII.G. of the permit*); inspection logs did not include detailed observations or a checklist indicating what exactly was inspected or how it was inspected; inspection logs did not include observations of outfalls /discharge points (*These are violations of Parts IV.D.3.d. and f. of the permits*).

The NPDES permit requires that the SWP3 describe and insure implementation of Best Management (BMPs) practices. These BMPs must address several different components of facility operations that are listed in the permit. BMP implementation issues were noted for the following facility operations:

Good Housekeeping. This item requires implementing BMPs that result in the maintenance of a clean, orderly facility. While progress has been made at Endres, spilled and blown material remained exposed to storm water. At the time of our visit, dust and material were noted on the manufacturing building's walls. It was observed mixed in with the stone and dirt on the east side of the facility near the covered docking bay. Wrappers and debris were observed on the ground on the west side of the building. Material tracking was evident on the pavement on the south side of the building.

On the south side where the compactors were located food waste was on the ground, on the outside of the compactors, and some of the compactors were open to precipitation. *This is a violation of Part IV. D.3.a. of the permit.*

Spills must be cleaned up as soon as possible. Most of the grounds immediately around the building are covered in stone, which makes cleaning spilled material difficult. Endres should investigate installing a surface which better facilitates clean-up.

Management of Runoff – The SWP3 shall contain a narrative consideration of the appropriateness of traditional storm water management practices used to divert, infiltrate, reuse, or otherwise manage storm water runoff in a manner that reduces pollutants in storm water discharges from the site. Endres has made some initial efforts to control runoff from areas where precipitation comes into contact with materials. A berm had been installed north of the building to separate Endres' runoff from that of Kalmbach Feeds. Drainage from the north east side of the site now flows southeast into a shallow drainage swale. The facility intends to install a culvert to better convey the swale's drainage under the driveway and towards the pond on the south side of the facility.

Standing water around the RTO equipment on the west side of the building had a white and orange discoloration to it. A sheen was also present. We recommend that a berm be placed around this area so that contaminated runoff and any wastewater from maintenance may be more easily captured and properly disposed.

Drainage from the west side of the site flows south to the pond. This pond reportedly has no outlet. However, it is not routinely monitored or included in the facility's inspections to insure there are no discharges. The water in the pond was very turbid and orange-brown in color, which may be an indication of an algal bloom and die-off. As mentioned in my July 3, 2008, letter, previous pond sampling data showed several pollutant concentrations in the pond water were similar to those for untreated domestic wastewater. Discharges of this untreated water would cause or contribute to an in stream exceedance of water quality standards. Such discharges are not authorized by the NPDES Industrial General Permit (IGP) and would make the facility ineligible for IGP coverage (see Part I.C.3.d. of the permit), if they occur.

This water would require treatment prior to discharge. However, Endres is considering land application. In either case, a wastewater treatment, storage, or disposal system requires an approved Permit To Install from Ohio EPA prior to its installation. Please refer to Ohio Administrative Code section 3745-42-03 regarding the contents of the PTI application. Due to the potential for Endres' discharge to contribute to an in-stream exceedance of water quality standards, Ohio EPA will require that an individual NPDES permit application be submitted with the PTI application for any discharging option.

Sediment and Erosion Control – The SWP3 shall identify areas that have a high potential for soil erosion and implement measures to limit it. Filter socks were observed in the swale to the north of the Office Trailer. This swale, located northeast of the process building, had some rill erosion and must be stabilized. *This is a violation of Part IV.D.3.h. of the permit.*

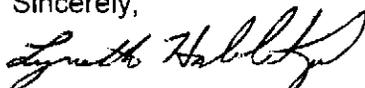
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NPDES Construction General Permit - In addition to modifications to manage the pond water, Endres is considering site improvements such as installing a culvert on the east side to better convey runoff from the north end of the site, under the drive, and to the pond. The facility is also considering making some drainage improvements (grading and catch basins) to the parking area south of the building. Please be aware that any earth disturbing activities that will result in the disturbance of one (1) acre or more will require coverage under Ohio EPA's NPDES permit for storm water discharges associated with construction activities. More information about the permit and its application process can be found at:
http://epa.ohio.gov/dsw/storm/construction_index.aspx.

Please revise your SWP3 accordingly and submit within 30 days a written certification that the requested changes have been made. Your reply must include **written notification** as to the actions taken or proposed to address the above noted violations. Your response must address the contaminated water around the RTO equipment, and should include the dates, either actual or proposed, for the completion of the actions.

If you should have any further questions regarding the Storm Water Program, please call me at 419-373-3009. Specific questions about a Permit To Install or individual NPDES permit applications should be directed to Walter Ariss at 419-373-3070.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Coordinator

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pc: [DSW-NWDO File ...]
Walter Ariss, DSW-NWDO
Mike Bishop, Plant Manager