



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

August 10, 2009

Re: Gallia County
Bob Evans Farms, Inc.
City of Gallipolis
IU Compliance Inspection
Pretreatment

Mr. David Morgan, Plant Manager
Bob Evans Farms
363 Green Valley Drive
Bidwell, Ohio 45614

Dear Mr. Morgan:

On July 14, 2009, I inspected Bob Evans Farms, Incorporated's Bidwell Plant. The inspection was conducted to evaluate the facility's compliance status with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You represented Bob Evans Farms during the inspection.

General Facility Description:

Bob Evans Farms produces patty, link and bratwurst sausage products from hogs. The hogs are kept in a holding pen prior to slaughter. Hogs are first killed and the blood is drained before skinning, gutting, and deboning. The meat is then ground, and may be cooked and rapid cooled prior to packaging. Ground meat and meat products may be stored in one of several coolers and freezers prior to packaging or shipping.

Wastewater is generated from cleanup of the holding pens, processing areas and equipment, and coolers and freezers. Wastewater is also generated from cooking ovens, laundering of work coats, cleaning aprons, and defrosting the chillers. The equipment cleanup process involves detergent cleaning followed by a rinse then sanitation with either sodium hypochlorite or benzyl ammonium chloride. Manure from the hog pens is routed to a holding pit for storage prior to land application. Blood is collected and shipped off site for rendering. Sanitary wastewater (roughly 2500 gpd) is treated in a small aeration treatment plant located next to the process sewer line. The treated sanitary effluent is hauled to the lagoon where it is commingled with the process water.

Bob Evans began discharging process water to the Gallipolis sanitary sewer in February 2008. Prior to that, all wastewater was land applied to nearby fields.

Pretreatment System:

All process water drains to a grease interceptor, from where it flows to a pumping station and pumped to an aerated lagoon. Cooking water is first routed to a holding tank then through a dissolved air floatation unit before discharge to the interceptor. The lagoon has a volume of 1.14 million gallons and has two stages, an aerated section and a settling area. Lagoon effluent may either be pumped into a sprinkler system, where it is used to irrigate an 18 acre field on Saturdays during dry weather, or pumped to the Gallipolis sewer on week days. Roughly 20,000 gpd of lagoon wastewater is pumped to the sewer on discharge days. The flow rate is estimated by using the pumping rate of roughly 80 gpm and the pump run time. The IDP requires discharge seven days per week. However, the plant is not staffed on Sundays and there have been no apparent problems since the startup of the discharge to the sewer. There was a flow meter installed at the monitoring station where the effluent connects to the sewer, but it failed within 3 months after startup of the discharge.

Bob Evans Farms is regulated by Ohio EPA as a non-categorical significant industrial user and holds an effective Ohio EPA Indirect Discharge Permit.

Required Actions:

1. Samples should be collected from the final discharge to the sewer rather than from the lagoon near the pump intake as is currently done. It was agreed during the inspection that manual composite and grab samples would be collected from the valve on the effluent line immediately after the drum filter.
2. Samples should be refrigerated during collection, storage and shipping to maintain a sample temperature of 4 degrees Celsius. Samples are shipped to American Analytical Services of Dublin, Ohio for analysis using a courier service.
3. Ohio EPA records show that Bob Evans Farms has not applied for a storm water permit from Ohio EPA. The facility should either apply for coverage under the general storm water permit for industrial activity, or, if eligible, submit a no exposure certification. Additional information on stormwater permit requirements is available online at http://www.epa.state.oh.us/dsw/storm/industrial_index.html. You may also contact Aaron Wolfe at (740) 380-5277 for further information.

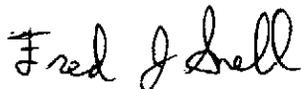
Recommended Actions:

1. There were open floor drains in the bulk chemical storage area. I recommend that a spill containment kit be provided and stored nearby to enable a quick response to any spills. You may also wish to consider the use of stand pipes in the drains to enable containment of any spills.

2. Bob Evans should consider installation of a new grease interceptor. The existing interceptor appeared to be at the end of its life expectancy, and new interceptor designs are much more efficient at grease removal. A new interceptor would likely reduce maintenance problems from grease buildups at the pumping station or in the gravity sewer.
3. Sanitary wastewaters are currently treated in an aeration system and stored in a holding tank. The treated wastewater is then hauled by tank truck for discharge into the lagoon. Bob Evans may wish to consider connecting the sanitary discharge directly to the process sewer, which is located nearby, to save on labor and other expenses for trucking the wastewater up to the lagoon.

Please respond to this letter in writing, within 30 days. You may contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

c: John Westfall, Gallipolis WWTP
c: Pretreatment Unit, DSW, CO
c: Aaron Wolfe, DSW, SEDO

PRETREATMENT Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00029*CP	OHP000018	July 14, 2009	3	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Bob Evans Farms Inc 363 Green Valley Drive Bidwell, Ohio 45614	10:30 am	July 1, 2007
	Exit Time	Permit Expiration Date
	12:30 pm	June 30, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
David Morgan, Plant Manager	(740) 446-2612
Name, Address and Title of Responsible Official	Phone Number
same	

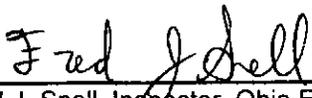
C. AREAS EVALUATED DURING INSPECTION

S = Satisfactory
M = Marginal
U = Unsatisfactory
N = Not Evaluated

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

D. SUMMARY OF FINDINGS/COMMENTS(attach additional sheets if necessary)

See attached letter. IU nonsampling inspection.


8/10/09

 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office Date


8/10/09

 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office Date