



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

October 7, 2009

**Re:** Pretreatment  
Compliance Inspection  
Island Aseptics, LLC  
Village of Byesville  
IDP ODP00003\*FP

Mr. Tom Szymaniak, Plant Manager  
Byesville Aseptics, Inc.  
100 Hope Road  
Byesville, Ohio 43723

Dear Mr. Szymaniak:

On September 23, 2009, I inspected Island Aseptics, Incorporated. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). Eric Phillips, and John DeVore represented Island Aseptics during the inspection. Tom McVickers, Randy Mercer, and Karen Froelich were also present during the inspection representing the Village of Byesville.

**General Facility Description**

Island Aseptics blends and packages aseptic juice products and concentrated drink mixes for various customers. Process wastewaters are generated from sanitizing drink packages, and cleanup and sanitation of blend tanks, product piping and filling equipment, floors and production areas. Off specification products are crushed in a compactor equipped with a holding tank which is piped to the pretreatment system. Concentrates from product changes may be transported to the pretreatment system in totes or pumped to the pretreatment system. Other process wastewaters drain to the pretreatment system by gravity, including a crusher used for off specification packaged products. Sanitary wastewater is discharged to the Byesville sewer system from a line exiting the northeast corner of the building which combines with process wastewater immediately upstream from the Village's flow metering manhole. The ion exchange water treatment system has been replaced with a reverse osmosis system. The reverse osmosis concentrate is discharged directly to Wills Creek under authorization of an NPDES permit.

Island Aseptics has increased production of concentrate products significantly since the previous inspection, which has resulted in higher pollutant loadings at the pretreatment plant. A second Stork processor was added for preparing concentrate mixes.

The pretreatment system consists of aerated equalization, anaerobic treatment using an upflow anaerobic sludge bed reactor (UASB), activated sludge treatment, and final clarification. Sludge is no longer digested as the former digester is used for additional activated sludge treatment in response to the higher pollutant loadings. Sludge is fed to the UASB, hauled to the Byesville WWTP for dewatering on the sludge drying beds, or hauled to Suburban Landfill for stabilization. High strength wastes may be accumulated in a holding tank prior to treatment. Sludge may be stored in a newly installed 7500 gallon holding tank. Concentrated wastewaters may also be hauled off site for treatment at the City of Newark WWTP.

Island Aseptics holds an effective Indirect Discharge Permit (IDP) which expires June 30, 2011. The company is regulated by Ohio EPA as a noncategorical significant industrial user.

Island Aseptics experienced at least two upsets at the anaerobic treatment system this summer. The pretreatment system was upset at the time of the inspection. The activated sludge tanks and clarifier were dark and solids were exiting the clarifier. It was reported that the UASB had been upset two weeks earlier by a combination of cleaning chemicals and heavy loading. The UASB had been reseeded and was producing methane at the time of the inspection, but dead reactor sludge was still working through the system

Discharges during the plant upset at Island Aseptics caused the Byesville wastewater plant to violate its effluent limits for TSS during the week beginning September 21, 2009. It appears that Island Aseptics discharges also contributed to violations at the Byesville WWTP during August 2009. Island Aseptics is in violation of OAC 3745-3-04 and 40 CFR 403.5 for causing interference at the Byesville POTW during at least the months of August and September 2009.

### **Required Actions**

1. Island Aseptics pretreatment system has been consistently overloaded over the past several months. Island Aseptics is currently negotiating contracts with customers that may result in a significant increase in loading to the pretreatment plant. Island Aseptics should upgrade the treatment plant to ensure that it has adequate treatment capacity for existing and planned increases in pollutant loads. Island Aseptics should submit general plans to Ohio EPA for correcting noncompliance with pretreatment requirements within 60 days. An Ohio EPA permit to install is required prior to commencement of construction on upgrades to the pretreatment system in accordance with OAC 3745-42-02.
2. Please notify the Village of Byesville and Ohio EPA of any slug loading or other upsets at the pretreatment system as soon as possible in accordance with Part II, Paragraph 3 and Part III, Paragraph 10 of the IDP.

3. Island Aseptics' IDP requires composite samples for BOD5 and TSS. Island Aseptics has been collecting a single grab sample for analysis on one morning each week. The term "composite" is defined in Part III, Paragraph 1 of the IDP. Please collect composite samples for BOD5 and TSS during future sampling events.
4. Island Aseptics' IDP and OAC 3745-3-06(F) include specific signatory requirements for discharge monitoring reports (DMRs) and applications. Please ensure that the appropriate authorized representative of Island Aseptics signs DMRs or provide a copy of the written delegation of authorization as described in OAC 3745-3-06(F)(4) to Ohio EPA within 30 days.
5. Ohio EPA requested that Island Aseptics collect a sample of the discharge on the date of the inspection. Please provide a copy of the results of sampling to Ohio EPA and the Village of Byesville within 30 days.

### **Comments**

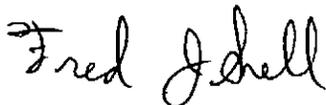
The holding tank liner was leaking at the time of the inspection. Island Aseptic stated that the liquid was being gradually removed to enable repair of the liner. Please notify Ohio EPA when the liner has been repaired or replaced. An overflow line which drains to the treatment system was recently added to the tank to prevent tank overfills from being released onto the ground near the tank.

### **Recommended Actions**

The holding tank does not have aeration equipment. If concentrates are held in the holding tank for prolonged periods, the tank contents become septic and generate odors. Odor was present at the time of the inspection. It is recommended that Island Aseptics consider installation of aeration for the holding tank to enable greater flexibility in operation of the treatment system and to reduce the generation of nuisance odors.

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: Karen Froelich, Superintendent, Village of Byesville WWTP  
c: Pretreatment Unit, DSW, CO

# PRETREATMENT Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00003*FP	OHP00024	September 23, 2009	3	S	2

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Island Aseptics, LLC 100 Hope Road Byesville, Ohio 43723	10:30 am	7/1/2006
	Exit Time	Permit Expiration Date
	3:30 pm	6/30/2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Eric Phillips, Owner Envirotec Environmental Engineering John DeVore, Operator	(740) 704-3872
Name, Address and Title of Responsible Official	Phone Number
Tom Szymaniak, Managing Director	(740) 685-2548 Ext. 106

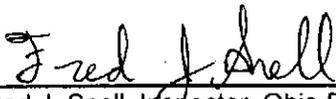
## C. AREAS EVALUATED DURING INSPECTION

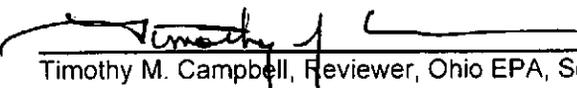
**S = Satisfactory**  
**M = Marginal**  
**U = Unsatisfactory**  
**N = Not Evaluated**

<u>  M  </u> Permit	<u>  S  </u> Flow Measurement	<u>  M  </u> Pretreatment
<u>  S  </u> Records/Reports	<u>  S  </u> Laboratory	<u>      </u> Compliance Schedules
<u>  S  </u> Operations & Maintenance	<u>  U  </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>  S  </u> Collection System		

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

See attached letter.

  
 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office
 
 10/7/09  
 Date

  
 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office
 
 10/7/09  
 Date