OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

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

November 25, 2009

Re: Pretreatment
Tastee Apple, Inc.
Village of Newcomerstown
Compliance Inspection
Permit No. 0DP00025

Mr. Jerry Herbert, Vice President of Manufacturing
Tastee Apple, Inc.
60810 County Road 9
Newcomerstown, Ohio 43832

Dear Mr. Herbert:

On October 29, 2009, Ohio EPA conducted an inspection at Tastee Apple, Inc. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You represented Tastee Apple during the inspection.

Based on the inspection and a review of monitoring reports submitted between July 2007 and June 2009, Tastee Apple is in partial compliance with state and federal pretreatment standards.

General Facility Description:

Tastee Apple produces apple cider, several caramel apple products, and chocolate apples. Caramel apples are only produced during the fall. Chocolate apples may be produced at various times during the year, with production greatest in December. Heaviest cider production is in the fall and early winter. Cider production may occur sporadically during the spring and summer months. Average daily flow during the 2008 caramel apple season was roughly 5500 gpd. There is no process water flow on days when there is no production during the off season.

Tastee Apple is regulated as a non-categorical significant industrial user by Ohio EPA.

Main Building

The cider line processes include deleafing, washing, rinsing, apple pressing, clarification, pasteurizing, chilling, and jugging. Wastewater is generated from apple washing, rinsing, cider spillage, cleaning in place (CIP) of cider making equipment, and floor cleaning.

Waste waters from the cider lines are discharged to Outfall 001 after pretreatment using the equipment described below in the section labeled pretreatment.

Carmel Building

The caramel apple building processes consist of apple cleaning and deleafing, coating with caramel, nuts, coconut, chocolate and/or colored sprinkles, and packaging. Wastewater is generated from apple wash and deleaf and cleanup of equipment and process areas. Waste waters from the caramel and chocolate apple lines are routed to a 1000 gallon oil/water separator before discharge to Outfall 002.

Pretreatment:

Cider production wastewaters, including clean in place and apple pit water, are routed through a Hycor Rotoscreen then pumped to the 10,000 gallon equalization tank of the biological treatment system.

The pretreatment system consists of the 10,000 gallon equalization tank, two 16,500 gallon aeration tanks, and a 4500 gallon final clarifier. Effluent from the settling tank combines with other flows at the 1500 gallon pH adjustment tank, from where it flows to the Number 2 Grease Interceptor, then discharges to the Newcomerstown sanitary sewer. Waste sludge is hauled to the Newcomerstown wastewater treatment plant (WWTP) by Forest Hill Septic Service.

Effluent Limit Exceedances:

Tastee Apple reported the following exceedances of its IDP limits between July 2007 and December 2008:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00402	pH, Minimum	1D Conc	5.5	4.41	9/18/2008
002	00402	pH, Minimum	1D Conc	5.5	2.91	10/2/2008
002	00402	pH, Minimum	1D Conc	5.5	3.87	11/13/2008
001	00402	pH, Minimum	1D Conc	5.5	4.97	7/12/2007
001	00402	pH, Minimum	1D Conc	5.5	5.25	8/2/2007
001	00402	pH, Minimum	1D Conc	5.5	4.71	9/20/2007
001	00402	pH, Minimum	1D Conc	5.5	3.23	9/27/2007
001	00402	pH, Minimum	1D Conc	5.5	4.79	10/11/2007

Comments:

1. Tastee Apple reported violations of pH limits at both outfalls. It appears that the majority of the 001 violations were caused by low flows through the 2000 gallon final grease interceptor. The pH is adjusted prior to discharging to the interceptor, and septic conditions in the interceptor appear to cause the pH to drop before reaching the sample station. Tastee may wish to consider installing

a bypass pipe or piping through the interceptor to eliminate pumping costs for the interceptor and to improve pH compliance. It appears the interceptor may no longer be needed now that the chip line has been eliminated.

2. No process water discharges were reported for either outfall on the effluent monitoring report for the January through June 2009 reporting period. Were there any process water discharges during this period? Sampling is not required during periods when only sanitary wastes are discharged. However, if a discharge occurs on any day during a given week or month, a sample is required during that interval for outfall 001 or outfall 002, respectively.

3. The biological pretreatment system appears to be of marginal effectiveness in reducing BOD5 as indicated by the significant BOD5 concentrations in the effluent after treatment. Tastee's effluent has been well within the IDP BOD5 loading limits. Some tanks and components are constructed of steel which is corroding due to the acidic nature of the waste and exposure to weather. Sludge is generated which must be hauled to the wastewater treatment plant which adds to the expense of operation. The chip line was removed and cider production is down which have significantly reduced the flow and BOD5 loading in the discharge. Tastee may wish to analyze the costs of eliminating the biological treatment portion of the system vs. discharging without the biological treatment system, and depending on the outcome of the analysis, consider decommissioning the biological portion of the treatment system. It will still be necessary to perform screening, flow equalization and neutralization on the wastewater. Please notify Ohio EPA and the Village of Newcomerstown prior to implementing any changes to the treatment system.

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

Sincerely,

Fred J. Snell

Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

c: Tom Sauerbrey, Utilities Director, Village of Newcomerstown
c: Pretreatment Unit, DSW, CO

Pretreatment
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0DP00025*CP	OH0026689	October 29, 2009	3	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Tastee Apple, Inc. 60810 County Road 9 Newcomerstown, Ohio 43832	10:00 a.m.	June 1, 2007
	Exit Time	**Permit Expiration Date**
	12:30 p.m.	May 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jerry Herbert, Vice President of Manufacturing	(740) 498-8316, Ext. 214
Name, Address and Title of Responsible Official	**Phone Number**
Greg Hackenbracht, CEO	(740) 498-8316

C. AREAS EVALUATED DURING INSPECTION

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

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached letter.

Fred J. Snell

Fred J. Snell, Inspector, Ohio EPA, Southeast District Office — Date 11/25/09

David R. Schuck for

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office — Date 11/27/09