



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

February 14, 2012

Re: Pretreatment
Pepsi Cola Bottling Co. of Portsmouth
Scioto County Wheelersburg
Compliance Inspection
Permit No. ODP00008*EP

Mr. Rod Armstrong, Director of Operations
G & J Pepsi Cola Bottlers, Inc.
P.O. Box 299
4587 Gallia Pike
Franklin Furnace, Ohio 45629

On January 19, 2012, Scott Foster and I inspected G & J Pepsi Cola Bottlers Incorporated of Portsmouth. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You, Keith Otworth, Quality Control Manager, and Dave Harr, Pretreatment System Operator represented Pepsi Cola Bottling during the inspection.

General Facility Description:

Pepsi Cola Bottling produces and distributes various Pepsi products in cans, bottles, and syrup containers. Products include teas, soft drinks, fruit and juice drinks, water and flavored water.

Wastewaters are generated from water supply treatment processes including anthracite filter backwashes, activated carbon tower backwash, cleanup of filling equipment and piping, and off specification and out dated products. Reverse osmosis concentrate wastewaters are segregated and discharged directly to the Ohio River via a storm sewer, while membrane cleaning wastewaters are routed to the sanitary system. Process and sanitary wastewaters are discharged to a Biolac extended aeration lagoon system for pretreatment before release to the Scioto County sewer system.

The pretreatment system consists of a 2 million gallon aeration basin with a built-in clarifier and a 600,000 gallon aerated sludge holding lagoon. Ammonia and potassium chloride are added to maintain the nutrient balance in the lagoon to support biological growth. Sufficient phosphorus for treatment requirements is present in the wastewater from product residual and sanitation chemicals. Average daily flows were approximately 110,000 gallons during 2011. Little's Septic Service has a contract to operate the pretreatment system. A belt filter press is employed for sludge dewatering. Dewatered sludge is hauled to River City Landfill near Ashland, Kentucky. Sludge generation is roughly 20 cubic yards per month.

Comments:

1. G & J Pepsi Cola reported the following exceedances of its IDP limits between January 2010 and December 2011:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00056	Flow Rate	1D Conc	140000	161550.	8/4/2010
001	00310	BOD5	1D Conc	300	355.	8/18/2010
001	00056	Flow Rate	1D Conc	140000	185807.	8/18/2010
001	00056	Flow Rate	1D Conc	140000	153141.	8/25/2010
001	00310	BOD5	1D Conc	300	325.	9/1/2010
001	00056	Flow Rate	1D Conc	140000	144965.	4/13/2011
001	00056	Flow Rate	1D Conc	140000	173676.	8/3/2011
001	00056	Flow Rate	1D Conc	140000	144796.	9/28/2011
001	00056	Flow Rate	1D Conc	140000	146009.	10/12/2011
001	00056	Flow Rate	1D Conc	140000	143176.	11/16/2011
001	00056	Flow Rate	1D Conc	140000	166594.	12/7/2011
001	00056	Flow Rate	1D Conc	140000	152491.	12/21/2011

The effluent limit exceedances reported for the months of August and September of 2010 occurred when treatment units were taken out of service during replacement of the liner systems. Please provide an explanation for the exceedances of the flow limit which were reported in 2011, along with a description for corrective measures to prevent future violations.

2. The liners under the extended aeration lagoon and sludge holding lagoon were replaced during August and September 2010. The diffusers were removed and repaired while the respective lagoons were out of service. The treatment system appeared to be performing well at the time of the inspection.
3. The effluent sampler line was hardened and had an accumulation of debris inside the line. The sampler line has since been replaced.

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
District Representative
Division of Surface Water

FJS/dh

Enclosure

c: Joe DeLong, Scioto County Sanitary Engineer
c: Pretreatment Unit, DSW, CO

Pretreatment Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00008*EP	OHP000059	January 23, 2012	6	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Pepsi Cola Bottlers, Inc. of Portsmouth 4587 Gallia Pike Franklin Furnace, Ohio 45629	10:30 a.m.	May 1, 2010
	Exit Time	Permit Expiration Date
	2:30 p.m.	April 30, 2015

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Keith Otworth, Quality Assurance Manager	(740) 354-9809
Name, Address, & Title of Responsible Official	Phone Number
Rod Armstrong, Director of Operations	(740) 354-9798

C. AREAS EVALUATED DURING INSPECTION

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

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

2/14/12
Date

Jennifer M. Witte
Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office

2/14/12
Date