



Environmental
Protection Agency

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

CERTIFIED MAIL #91 7108 2133 3932 1838 5926

February 27, 2012

Stephen J. Sauer, Owner
SunSprout Farms of Central Ohio LLC
151 Amazon Road
Columbus, OH 43214

Re: SunSprout Farms of Central Oh LLC
NPDES Permit 4IN00051/ OH0105864
Reconnaissance Inspection
Franklin County

Dear Mr. Sauer:

This correspondence serves as **Notice of Violation** for failure to sample and report effluent monitoring data in accordance with the terms and conditions of your effective NPDES permit.

On February 15, 2012, a Reconnaissance Inspection was conducted at the SunSprout Farms of Central Ohio facility in Columbus, Ohio. Present for the inspection were yourself and Eddie Sauer representing Sunsprout Farms, Cole Miller and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to review the operational practices generating wastewater discharged through the permitted outfall, discuss the revised sampling requirements in the recently renewed NPDES permit and discuss the consequences of non-reporting of eDMR data.

Since the previous inspection was performed in October 2009, Sunsprout Farms failed to collect and submit effluent sampling data for five of the required reporting months. Please be advised that your recently reissued NPDES permit requires quarterly sampling during the months of March, June, August and December. Please also be advised that escalated and formal enforcement action, with financial penalty, shall be initiated if Sunsprout Farms of Central Ohio LLC fails to collect and submit the required quarterly sampling data at any time during the term of this permit.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

Michael Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Michael Sapp

MS/nsm Sunsprout Farms 12

Central District Office
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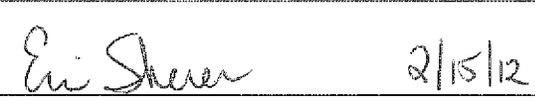
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IN00051	OH0105864	RI	S	Industrial
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
2/15/2011	10:00 AM	10:35 AM	Yes	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
SunSprout Farms of Central Oh LLC 2625 McGuffey Road Columbus, Ohio 43211	9/1/2011
	Permit Expiration Date
	8/31/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Stephen J. Sauer, Owner Eddide Sauer	(614) 262-3332
Name and Title of Responsible Official	Phone Number
Stephen J. Sauer, Owner	(614) 262-3332

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Failure to collect and submit data required by permit
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
S	Receiving Waters	
S	Laboratory	

Comments:

Signatures	
 2/15/12	 2/15/12
Michael Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

ADDITIONAL INFORMATION
Sunsprout Farms of Central Ohio
4IN00051 - OH0105864

General

Sunsprout Farms is involved in the hydroponic production of bean, alfalfa, wheat, radish, broccoli and clover sprouts. The facility produces approximately 18,000 – 20,000 pounds of sprouts per week. Bean sprouts are produced by placing bean seeds in stainless steel vats where they are periodically watered. Seeds grow to sprouts in approximately four days. The water applied to the bean sprouts is directed to a floor sump before it is pumped to the storm sewer outside of the facility. Water is supplied by the City of Columbus. The bean seeds are pre-soaked for a day in a mild bleach solution, which is subsequently directed to floor sump via a diverter valve, and sent to the sanitary sewer. A mild coconut oil based detergent is used to wash the dry seeds prior to soaking.

Alfalfa sprouts are produced in large rotating bins that are exposed to light. Water is misted onto the seeds before it enters a floor drain to the sanitary sewer. The floor drain is equipped with a screen to prevent plant material from entering the sewer. The growing rooms for the bean sprouts and the other sprout varieties are washed down 2-3 times per week. Washdown waters are also conveyed to the floor sump where a butterfly valve is used to manually redirect these flows to the City of Columbus sanitary sewer.

At the time of the inspection, the following general observations were made with operational practices at the facility:

1. Flow values on the eDMRs are reported using a deduct meter on line to the storm sewer. Flow values reported on the eDMR, for the past 12 months, range from 3,000-13,800 gpd.
2. The supply water for the seed cultures is heated prior to use during the months of September - June. A counter-current heat exchange system is utilized to conserve energy.
3. Chlorinated water, which is used for soaking mung bean seeds, enters the sump in the mung bean room and is diverted to the sanitary sewer using the diverter valve on the discharge line.

4. A review of the monthly operating report data since October 2009 showed the range of results illustrated in the following table:

Parameter	Concentration
CBOD ₅	2.6 – 7.2 mg/l
Suspended Solids	1.0 - 9.0 mg/l
Ammonia	0.12 – 0.49 mg/l
Water Temperature	14-22 °C
pH	6.64 – 6.91
Flow	3,00 – 13,800 gpd

5. Effluent samples are collected from the floor sump and sent to Columbus Water and Testing Laboratory for analysis.
6. A dilute solution of a product called P1 is added to the mung bean seeds to promote growth. This product has a nutrient registration label of 0-1-0.
7. All of the floor drains in the basement of the facility drain, by gravity, to the City of Columbus sanitary sewer system. The floor drain in the mung bean growing room drains to a sump to a sump pit where it is pumped up to the storm sewer system (NPDES outfall 001).
8. The effluent line from the mung bean sump is equipped with a particulate filter for solids removal. The drain line into the sump pit is equipped with a strainer for solids removal.
9. Sunsprout Farms failed to collect and submit effluent sampling data for the following months: July 2010, August 2010, September 2010, June 2011 and August 2011. **This is a violation of your NPDES permit.**
10. The recently renewed NPDES permit requires quarterly sampling during the months of March, June, August and December. Sampling must be conducted in these months and reported on or before the 20th day of the following month. (Note: sampling performed in November 2011 cannot be submitted for the December 2011 quarterly requirement). **Failure to sample, on a quarterly basis in the specified month, shall result in the initiation of formal enforcement action.**

Compliance Data for SunSprout Farms of Central Oh LLC between 10/1/2009 to 12/30/2011

Summary

Permit Effluent Limit Violations: 0
Permit Effluent Code Violations: 0
Permit Effluent Frequency Violations: * 0
Compliance Schedule Violations: 0

*The facility has 5 missing data reports.

Station	Required Report Period	DMR Received
001	July 2010	No
001	August 2010	No
001	September 2010	No
001	June 2011	No
001	August 2011	No