



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 21, 2012

RE: WAYNE COUNTY
CITY OF WOOSTER
INDUSTRIAL STORM WATER
FRITO-LAY INCORPORATED
3GR00288*EG

Ms. Pam Carter
Frito-Lay Inc.
1626 Old Mansfield Road
Wooster, OH 44691

Dear Ms. Carter:

On June 6, 2012, Dan Bogoevski and this writer conducted an inspection of your facility, located at 1626 Old Mansfield Road, Wooster, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity #OH000005 referenced above. During the inspection, Mike Ashamalla and Sue Suppan were present to represent Frito-Lay Inc.

General

1. This site is the location of Frito-Lay Incorporated, a company that manufactures potato and corn chip snacks. This facility is described by Standard Industrial Classification (SIC) code 2096. This corresponds to sector and subsector U3 in the NPDES permit.
2. Storm water drains from the parking lot of the visitor entrance, north along the building, to Outfall A on Old Mansfield Road where it connects to the street's storm sewer system.
3. Storm water from the northeast parking lot drains to Outfall B.
4. Storm water from the shipping docks drains south towards State Route 302, then turns west, and drains along the street to Outfall C and into an unnamed tributary of Killbuck Creek.
5. Storm Water from the west side of the facility drains south to manhole MW2, then drains southwest to catch basin CW13 and then drain south to Outfall D and into the same unknown tributary.
6. Storm water is also discharged from an additional truck parking lot located at the NE corner of SR 302 and Old Mansfield Road.

Inspection Observations

1. Oil from the heat exchanger, on the east side of the building, is leaking out of the doors (Figure 1). The facility has installed a berm inside of the doors to stop the oil from leaking out and to make sure the oil enters the adjacent trench drain that connects to sanitary sewers (Figure 2). A larger berm would be better. There is evidence that shows oil has spilled over the existing berm in the past. Air filters above the doors may be also be a source of storm water pollution here (Figure 3). They appear dirty and may need to be changed.
2. Piles of potato particulate are visible under the conveyor system of the potato unloading dock on the northeast side of the facility (Figure 4). This particulate, like sediment, is a pollutant to storm water. Placing a hopper under the conveyor system to catch the potato particulate should prevent the discharge of this pollutant to the storm water system.

3. In addition, at the potato unloading station, leaking oil stains from the potato trucks are visible on the pavement. Implement good housekeeping practices to make sure the leaks are cleaned up immediately. If it is noticed that a truck is leaking, place a dip pan under it so to catch the leaking oil.
4. The air vent from the wastewater sludge room has evidence of staining on the wall and dust and debris on the vent (Figure 5). A finer screen may be required to catch the dust particles and prevent the dust from escaping. Implement good housekeeping practices to make sure the vent is cleaned regularly.
5. At the starch waste removal door, on the north end of the facility, there are black oil stains on the pavement exiting the garage door and towards the compost dumpster (Figure 6). Good housekeeping practices must be implemented to avoid dripping oil on the pavement or tracking oil outside. Do not carry a large load to the dumpster so to minimize spilling.
6. The compost dumpster is covered by a tarp, but there is compost on the ground all around the dumpster (Figure 7). Implement good housekeeping practices to keep the area around the dumpster clean. If materials are spilled in the transfer process, clean it up immediately. An additional compost dumpster or more frequent pick-up of the existing dumpster is also suggested.
7. The scrap dumpster, by the compost dumpster, is uncovered (Figure 8). The dumpster should be covered to prevent the collection of storm water and the formation of leachates.
8. There are corn dust stains on the building, coming out of the vent on the west side of the building, where the corn dust hopper is located inside the building. An air filter should be installed in the vent to prevent the dust from being exposed.
9. The maintenance building, next to the pump house, on the west side of the facility, has an excess amount of oils seeping out of the garage door (Figure 9). The facility indicated that drainage in this area is connected to sanitary sewers. Still, a berm or other measures should be installed inside the maintenance building so to prevent the flow from exiting outside.
10. There is evidence of rail car leaks on the tracks (Figure 10). Good housekeeping practices must be implemented to quickly clean up the leaks immediately detected.
11. The waste dumpster and truck, on the west side of the facility, are leaking significant amounts of oils into storm water catch basin, CW19, right next to them (Figure 11). In manhole MHW2, there is evidence of oil getting in the system from the waste dumpster catch basin CW19 (Figure 12). The facility has installed a catch basin insert and other filters within the storm sewer system tributary to Outfall D to address this issue. Examining Outfall D, Ohio EPA did not see staining or other physical evidence that the pollutants are discharging into the unnamed tributary of Killbuck Creek, but we did detect the odor of cooking oil. The facility is advised to conduct more frequent visual observation of the discharge from Outfall D to determine if the measures taken are truly adequate. It should be noted that Ohio EPA observed this outfall during a period of dry weather. Observations during storm events may lead to other results. Discharges of cooking oil and other pollutants from the waste dumpster area are unacceptable. Additional measures that can be taken to address this situation include, but are not limited to, installation of an oil/water separator or other such treatment device, and re-routing CW19 to the sanitary sewer system. Looking at the site drainage map, Figure 3A in your Storm Water Pollution Prevention Plan (SWPPP), a sanitary line runs very close to the catch basin. Permission to reroute CW19 to sanitary sewers must be obtained from the City of Wooster and may require additional pre-treatment. The facility

should also determine the source of the oils in this area and see if additional source controls can be implemented.

12. There is an area of disturbed soil on the south side of the property, close to the truck entrance. The soil must be seeded and mulched so to stabilize the soil and prevent sediment runoff from entering the storm water system.

Permit

1. Quarterly visual assessments of **ALL** of your storm water discharges must be conducted every year as required in Part 4.2.1 in the permit. Please be aware that your auxiliary parking lot is also a point of storm water discharge. The sheet flow from the parking lot must be sampled quarterly. A video on how to take a sheet flow sample can be found on a link on the Ohio EPA website at:
http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx
2. The non-storm water discharge certification of your (SWPPP) is not filled out. This certification provides documentation that you have evaluated for the presence of non-storm water discharges and all unauthorized discharges have been eliminated as required in Part 5.1.3.4 of the permit. This evaluation document should be signed and dated as well.
3. The SWPPP is not signed. You must sign and date your SWPPP, including the date of signature, as required in Part 5.1.7 in the permit.

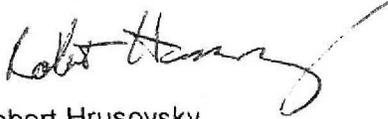
Action Items

- Make aforementioned improvements to the heat exchanger problems.
- Provide containment at the potato conveyor system.
- Place an air filter in the air vent of the wastewater sludge room.
- Carry small loads of starch waste to the compost dumpster so to minimize spillage.
- Clean up spilled materials around compost dumpster.
- Cover the scrap dumpster with lid or tarp.
- Place an air filter in the corn dust room air vent.
- Take measures to prevent outflow of pollutants from the maintenance building garage door.
- Make aforementioned changes to the waste dumpster catch basin, CW19.
- Seed and mulch disturbed soil.
- Implement good housekeeping practices for oil leaks, spills, trash and debris throughout the facility.
- Add the auxiliary parking lot to your list of outfalls, and implement quarterly visual assessments to this outfall as well.
- Make aforementioned improvements to SWPPP.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response no later than July 6, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by e-mail robert.hrusovsky@epa.state.oh.us. You can also contact Dan Bogoevski at (330) 963-1145 or by e-mail at dan.bogoevski@epa.state.oh.us.

Sincerely,



Robert Hrusovsky
Assistant to the District Engineer
Division of Surface Water

RH/cs

cc: Kevin Givins, City of Wooster, Utilities Dept
Mike Ashamalla, Frito-Lay Corp (same address as above)

INSPECTION PHOTOS:
June 6, 2012
Wayne County



Figure 1
Vegetable oils spill stains from heat exchanger.



Figure 3
Heat exchanger air filters – dirty, need to be changed.

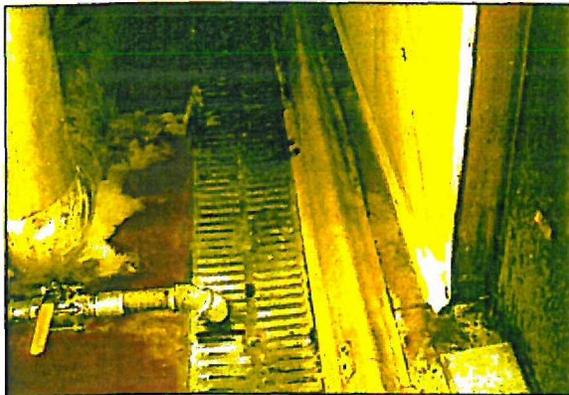


Figure 2
Berm and adjacent trench drain inside heat exchanger room.



Figure 4
Piles of potato particulate under conveyor system.



Figure 5
Wall stains from air vent.

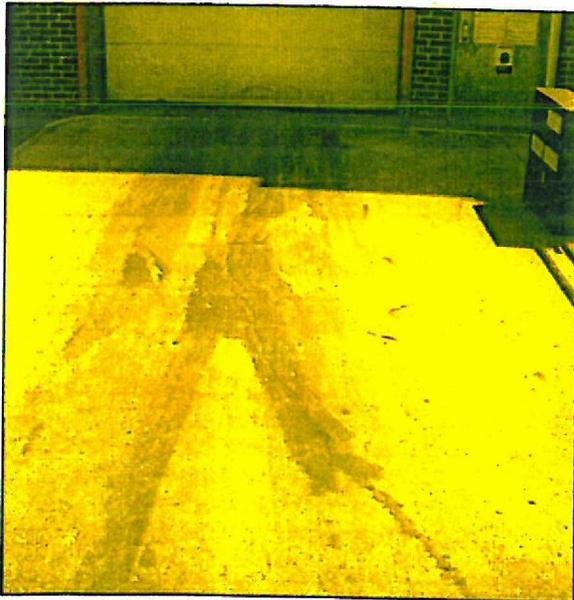


Figure 6
Stains from starch waste removal process.

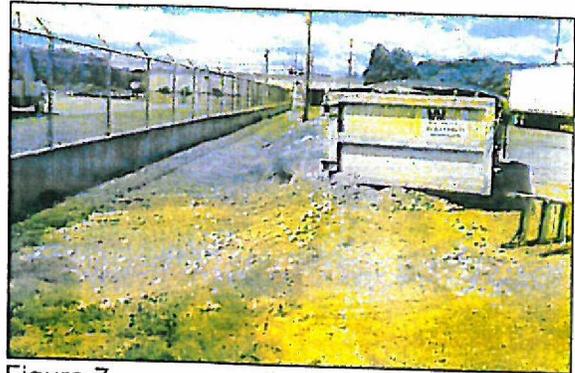


Figure 7
Compost dumpster needs good housekeeping.

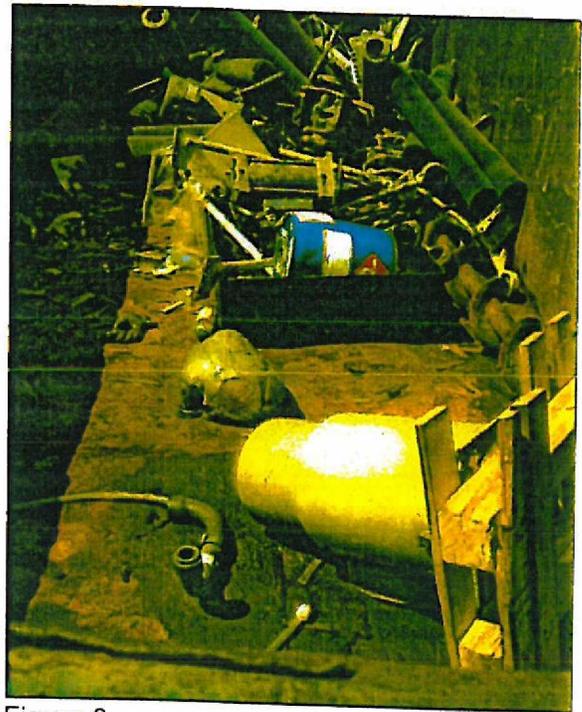


Figure 8
Scrap dumpster uncovered – oily parts inside.



Figure 9
Maintenance building - oils seeping out garage door. Must be bermed like heat exchanger room.

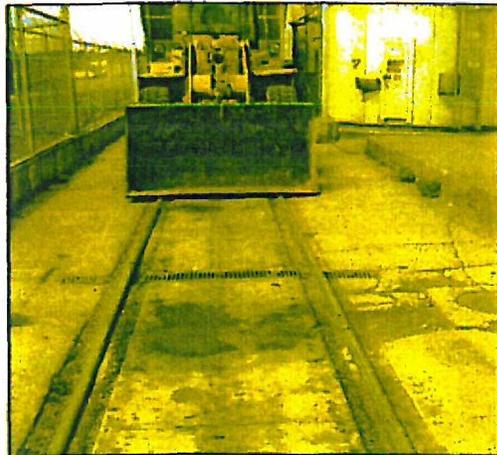


Figure 10
Oil stains from rail cars - Good Housekeeping!



Figure 11
Waste dumpster oil leaking into storm drain. Install oil/water separator.

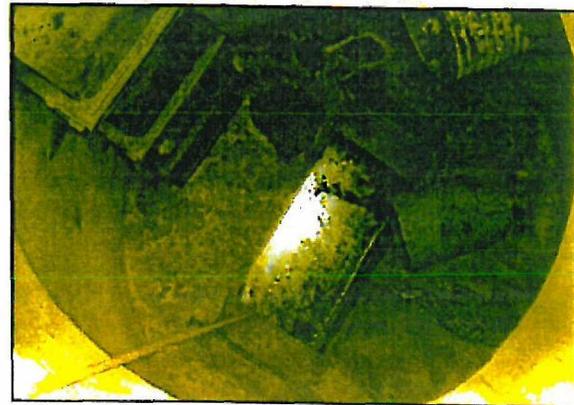


Figure 12
Manhole MHW2. Oil sheen present.