



**Environmental
Protection Agency**

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

June 28, 2012

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

Mr. John Kasinecz, Plant Manager
Byesville Aseptics, Inc.
100 Hope Road
Byesville, Ohio 43723

Dear Mr. Kasinecz:

On May 30, 2012, I inspected Island Aseptics, Inc. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and John DeVore of Envirotect Environmental Engineering represented Island Aseptics during the inspection.

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 and out dated products are crushed in a compactor piped to a 45,000 gallon calamity tank of the pretreatment system. Concentrates from product changes or spills are transferred directly to the calamity tank. Other process wastewaters drain to the pretreatment system by gravity. 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. A reverse osmosis system is used to treat raw water used in products. The reverse osmosis concentrate is discharged directly to Wills Creek under authorization of an NPDES permit.

The pretreatment system consists of aerated calamity, anaerobic treatment using an upflow anaerobic sludge bed reactor (UASB), activated sludge treatment, and final clarification. A membrane bioreactor is operated in parallel with the extended aeration system and discharges to the overflow of the clarifier. Waste sludge from the clarifier sludge is dewatered in filter bags.

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

Required Actions

1. Island Aseptics reported the pretreatment system was overloaded on 6/18/12. The overload was caused by concentrates from a new blend room, which had not been isolated and routed to the calamity tank. Island Aseptics bypassed treatment and discharged approximately 45,000 gallons from the equalization tanks to the Byesville POTW over a period of about 18 hours. The bypass was in violation of Part III, Paragraph 2 and Part III, Paragraph 21 of the IDP. Such violations may result in the imposition of civil and or criminal penalties as provided for in ORC Sections 6111.09 and 6111.99.

Island Aseptics reported it has since ordered pumps and piping to route the concentrates from the new blend room to the calamity tank. Please notify Ohio EPA when the new piping system has been installed.

2. Pursuant to Part III, Paragraph 8 of the IDP, Ohio EPA requests that Island Aseptics submit to Ohio EPA within 30 days the results of any samples collected between June 18 and June 23, 2012.

Comments

1. Island Aseptics upgraded their pretreatment system since the previous inspection. A larger 227,000 gallon anaerobic reactor with a COD design loading capacity of 25,000 lb/d replaced the existing 53,000 gallon reactor and a membrane bioreactor was added to operate in parallel with the extended aeration system. The new system was placed into service in February 2011. The system had performed well until the recent overload which occurred during the week of June 18, 2012. No exceedance of effluent limits were reported between February 2011 and May 2012.
2. The calamity tank liner had been repaired since the previous inspection. No evidence of leaks was observed during the inspection.
3. Island Aseptics' IDP expired in June 2011. Island Aseptics has applied to Ohio EPA for renewal of the IDP. The expired permit will remain in effect until the permit is renewed.

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

Sincerely,

A handwritten signature in blue ink that reads "Jennifer M. Witte for". The signature is written in a cursive style.

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
ODP000003*FP	OHP00024	May 30, 2012	3	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Island Aseptics, LLC 100 Hope Road Byesville, Ohio 43723	1:00 p.m.	July 1, 2006
	Exit Time	Permit Expiration Date
	3:00 p.m.	June 30, 2011

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Eric Phillips, Owner, Envirotec Environmental Engineering John DeVore, Operator	(740) 704-3872
Name, Address, & Title of Responsible Official	Phone Number
John Kasinecz, Plant Manager	(740) 685-0565

C. AREAS EVALUATED DURING INSPECTION

<u> </u> M Permit	<u> </u> S Flow Measurement	<u> </u> S Pretreatment
<u> </u> S Records/Reports	<u> </u> S Laboratory	<u> </u> Compliance Schedules
<u> </u> M 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.

Jennifer M. Witte for
Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

6/28/12
Date

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

6/28/12
Date