



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

Re: Mercer County  
Village of St. Henry  
Cooper Foods St. Henry  
Pretreatment

January 8, 2013

Mr. Tim Pearson  
Facilities Engineering Manager  
Cooper Farms Processing  
#1 Cooper Farms Drive  
St. Henry, Ohio 45883

Dear Mr. Pearson:

On November 27, 2012, a pretreatment compliance inspection was conducted of the Cooper Foods St. Henry processing facility located in the Village of St. Henry. The inspection consisted of a tour of the pretreatment facilities and completion of an inspection checklist. At the time of inspection, operations of the facilities were good.

Wastewater moves through floor drains around the facility and is collected and pumped to the pretreatment process. The new pretreatment process appears to have been installed according to your approved PTI #806644 and operating well. You indicated that the facility continues to work with an outside contractor to better treat the wastewater. The blood, feathers, and turkey parts are collected and sent to G.A. Wintzer & Son Company where they are processed and used for different applications.

We are in receipt of your self-monitoring reports covering the months of January 2011 through December 2011. Our review indicates violations of the conditions of your indirect discharge permit and they are listed below:

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
3/1/2011	601	00402	pH, Minimum	1D Conc	5.0	4.84
4/5/2011	601	00402	pH, Minimum	1D Conc	5.0	3.93

Our completed inspection report is enclosed for your records. If you have any questions, please call me at (419) 373-3019.

Sincerely,

Michelle M. Sharp  
Division of Surface Water

/jlm

Enclosures

pc: Stan Sutter, St. Henry WWTP  
ec: Ryan Laake, DSW, CO  
Tracking

## IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry: Cooper Foods St. Henry #1 Cooper Farms Drive St. Henry, Ohio 45883	
Date of visit: November 27, 2012	Time of visit: 10:30 AM
Name(s) of inspector(s): Michelle Sharp, ESH	
Provide Name(s) and titles(s) of industry representative(s):	
Name	Title
Mr. Tim Pearson	Facilities Engineering Manager
Mr. Ron Gelhaus	Village Administrator
Mr. Stan Sutter	Superintendent
Classification assigned by CA: Food Processor	
Did the CA inspector review/obtain the following as part of the industrial inspection?	
<ol style="list-style-type: none"> <li>1. Description of the products manufactured or the services provided by the IU.</li> <li>2. Verification of the IU's classification or discussion of any changes.</li> <li>3. Description of any significant changes in processes or flow.</li> <li>4. Identification of the raw materials and processes used. (Including a discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.)</li> <li>5. Description of the sample location and any differences in Ca and IU locations.</li> <li>6. Description of the treatment system which is in place.</li> <li>7. Identification of the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discussion regarding the adequacy of spill prevention.</li> <li>8. Discussion regarding whether hazardous wastes are stored or discharge and any related problems.</li> </ol>	
Notes:	

IU SITE VISIT DATA SHEET (Continued)

IU Name: Cooper Farms	Date: August 10, 2010
Notes:	

IU SITE VISIT REPORT FORM COMPLETED BY: Michelle Sharp TITLE: ESII	DATE: January 3, 2013 TELEPHONE: 419-373-3019
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## INDUSTRIAL USER INSPECTION CHECKLIST

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Facility: Cooper Foods St. Henry

Date of inspection: November 27, 2011

OH Number: OHP000035

IDP Number: 2DP00010

Facility Representative: Tim Pearson

Inspector(s): Michelle Sharp

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### COMPLIANCE

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1. Date of last pretreatment inspection: August 10, 2011
  
2. Has the facility been in compliance with its permit limits since the last inspection? Y  
If no, explain:
  
  
  
3. Is the facility in compliance with all other requirements? Y  
Sampling procedures Y  
Reporting (late reporting, failure to report, etc) Y  
Compliance schedules NA  
Submitted BMR and 90 day compliance reports NA  
Any other requirements NA  
  
If any of the above five answers is no, explain:
  
  
  
4. Was the facility required to perform any actions as a result of the last inspection? N  
Explain any unresolved actions:

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### FACILITY OPERATIONAL CHARACTERISTICS

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5. Number of Employees: 650
6. Shifts/Day: 2 Shifts (2<sup>nd</sup> shift is very small)
7. Production Days/Year: 250
8. Hours/shift: 8 hours
  
9. Any production changes since the last inspection? Y  
If yes, explain:  
Further processing of meat, but no change to water usage.
  
  
10. General facility description and operations:  
Turkey processing plant.

**FACILITY OPERATIONAL CHARACTERISTICS CONTINUED**

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11. Any change in materials used in production since the last inspection?  
If yes, explain: N
12. Any expansion or production increase expected within the next year?  
If yes, explain: N

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**WASTEWATER TREATMENT**

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13. Provide a schematic diagram and description of the wastewater treatment system:

Pretreatment system is owned by Cooper and operated by the Village of St. Henry

**Pre-Screen Equalization Basin -> Rotary Screen -> Post Screen Equalization Basin ->  
Flocculator -> DAF -> Village of St. Henry**

14. Was a PTI issued for the treatment system? Y
15. Were there any modifications to the treatment system since the previous inspection? Y
- If yes, was a PTI obtained? Y  
The rotary screen was changed out like for like.

PTI Number: 806644      Date: 3/21/2011

16. What is the treatment mode of operation? Continuous  
If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?  
Village of St. Henry

18. How often is the treatment system checked?  
Daily

WASTEWATER TREATMENT CONTINUED

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19. Is there an alarm system for the system? Y  
Explain:  
Telemetered, High Water and Power Alarm
20. Is there an operations and maintenance manual? Y
21. Is an inventory of critical spare parts maintained? Y  
If yes, list:  
Pumps and motors.
22. Are there any bypasses in the system? N  
If yes, describe the location:
- Have bypasses occurred since the last inspection? NA
- Was the POTW notified? NA
23. Are residuals or sludges generated? Y  
Method of disposal:  
Hauled offsite
- Frequency and amount of disposal:  
Daily, about 40,000 lbs
- Name of hauler/landfill/disposal facility:  
G.A. Wintzer & Son Company and Mike's Sanitation is the backup.
- Is any sludge generated subject to RCRA regulations? N
- If land applying sludge, is there a sludge management plan? NA

**PROCESS AND WASTEWATER INFORMATION**

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Turkey Chillers		110,000	65,000		
2. Process Water		299,800	494,800		
<b>Total Regulated Process Flow</b>		409,800	559,800		
<b>Noncontact Cooling</b>		2,000	2,000		
<b>Blowdown</b>					
<b>Reverse Osmosis Condensate</b>					
<b>Demineralizer Regeneration</b>					
<b>Filter Backwash</b>					
<b>Compressor Condensate</b>					
<b>Storm water</b>					
<b>Other Dilute Flows</b>					
<b>Unregulated Flows(provide list)</b>					
<b>Sanitary</b>		5,200	5,200		
<b>TOTAL FLOW</b>		417,000	567,000		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

None

**SELF MONITORING**

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26. Sample location(s) described in the facility's permit:  
At manhole#2 after DAF unit.
27. Is the facility sampling at the location(s) described in the permit? N  
 If no, describe the actual location:  
24 hour composite sampler at end of 2<sup>nd</sup> DAF
28. Is the location(s) where the facility is sampling representative? Y  
 If no, indicate a representative location:
29. Is the flow measured or estimated? Measured  
 If measured, how often is the meter calibrated?  
Per manufacture specification  
 If estimated, describe method of estimation:
30. Is pH monitored continuously? Y  
 If yes, how often is the meter calibrated?  
Weekly
31. Does the facility collect its own samples? N  
 If no, specify the sample collector:  
Village of St. Henry
32. Are appropriate sampling procedures followed?  
 Monitoring frequenciés Y  
 Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y  
 Flow proportioned samples NA  
 Proper preservation techniques Y  
 Sample holding times Y  
 Chain-of-custody forms Y
33. Are samples analyzed in accordance with 40 CFR 136? Y
34. Laboratory conducting analyses:  
Belmont Park Labs, Dayton, Ohio

**TOXICS MANAGEMENT**

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35. Are any listed toxic organics used in the facility?  
If yes, identify organics: N
36. Does the facility have a current toxic organic management plan(TOMP)? NA  
If yes, is it being implemented? NA
37. Has the facility had any uncontrolled releases or spills to the POTW since  
the previous inspection? If yes, please explain: N
38. Does the facility need a spill prevention plan or slug discharge control plan? NA  
If yes, does the facility have a written plan? NA
39. Identify any potential slug load or spill areas:

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**REQUIRED FOLLOW-UP ACTIONS**

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