Ohio EPA
40 years and moving forward

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

February 25, 2013

RE: WAYNE COUNTY
OHIO FARMS PACKING
NPDES# 3IH00074

Mr. Tom Nolan
Director of Engineering
Ohio Farms Packing
429 Westwood Avenue
Orrville, OH 44667

Dear Mr. Nolan:

On February 13, 2013 this writer and your discussed the operations of the current wastewater treatment plant and construction of the new wastewater treatment plant for your facility. The information gathered will be used in drafting the NPDES permit renewal for this facility.

Our records indicate a Permit-to-Install (PTI) for upgrades to the wastewater treatment plant was approved by Ohio EPA on August 17, 2010. The project consists of the construction of an upgraded wastewater treatment plant to provide an advanced treatment technology to serve the facility. The upgraded wastewater treatment plant is designed to treat an average daily flow of 70,000 gpd. The schedule for completion of the wastewater treatment plant was extended to January 2013. To date construction has started on the plant. The construction schedule was discussed. You will be sending me weekly email updates on the construction. A compliance schedule for completion and meeting final effluent limits as soon as possible will be included in the permit renewal.

The existing wastewater treatment plant consists of a trash trap, followed by a 16,500 gallon extended aeration treatment plant, a 5,400 gallon aerated sludge tank, dosing chamber, surface sand filter, a chlorine contact tank and a polishing pond which discharges to the Killbuck Creek. The current plant is being maintained during construction. The plant continues to have water quality violations. A review of your Discharge Monitoring Reports (DMRs) covering the period July 2012 through January 2013 revealed the following effluent violations:

Limit Violations

Permit No	Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IH00074*GD	July 2012	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	10.405	7/1/2012
3IH00074*GD	July 2012	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	1.75698	7/1/2012
3IH00074*GD	July 2012	601	Fecal Coliform	30D Conc	400	1876.16	7/1/2012
3IH00074*GD	July 2012	601	Biochemical Oxygen Dem	30D Conc	10	16.35	7/1/2012
3IH00074*GD	July 2012	601	Biochemical Oxygen Dem	30D Qty	0.62	2.10209	7/1/2012
3IH00074*GD	July 2012	601	Oil and Grease, Hexane	30D Qty	0.75	.81851	7/1/2012
3IH00074*GD	July 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	9.41	7/5/2012

3IH00074*GD	July 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	1.03289	7/5/2012
3IH00074*GD	July 2012	601	Fecal Coliform	1D Conc	400	4000.	7/5/2012
3IH00074*GD	July 2012	601	Biochemical Oxygen Dem	1D Conc	15	27.	7/5/2012
3IH00074*GD	July 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	2.96366	7/5/2012
3IH00074*GD	July 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	11.4	7/19/2012
3IH00074*GD	July 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	2.48107	7/19/2012
3IH00074*GD	July 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	1.24053	7/19/2012
3IH00074*GD	July 2012	601	Fecal Coliform	1D Conc	400	880.	7/26/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	6.86667	8/1/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	1.44147	8/1/2012
3IH00074*GD	August 2012	601	Fecal Coliform	30D Conc	400	4000.	8/1/2012
3IH00074*GD	August 2012	601	Biochemical Oxygen Dem	30D Conc	10	12.	8/1/2012
3IH00074*GD	August 2012	601	Biochemical Oxygen Dem	30D Qty	0.62	2.59903	8/1/2012
3IH00074*GD	August 2012	601	Oil and Grease, Hexane	30D Qty	0.75	1.22773	8/1/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	8.05	8/2/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	1.73675	8/2/2012
3IH00074*GD	August 2012	601	Fecal Coliform	1D Conc	400	4000.	8/2/2012
3IH00074*GD	August 2012	601	Biochemical Oxygen Dem	1D Conc	15	20.	8/2/2012
3IH00074*GD	August 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	4.3149	8/2/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	6.17	8/9/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	1.30779	8/9/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	6.38	8/22/2012
3IH00074*GD	August 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	1.27986	8/22/2012
3IH00074*GD	August 2012	601	Fecal Coliform	1D Conc	400	4000.	8/22/2012
3IH00074*GD	August 2012	601	Oil and Grease, Hexane	1D Qty	1.12	1.54466	8/22/2012
3IH00074*GD	August 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	2.63436	8/23/2012
3IH00074*GD	September 2012	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	4.585	9/1/2012
3IH00074*GD	September 2012	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	.78365	9/1/2012
3IH00074*GD	September 2012	601	Fecal Coliform	30D Conc	400	4000.	9/1/2012
3IH00074*GD	September 2012	601	Biochemical Oxygen Dem	30D Conc	10	11.8	9/1/2012
3IH00074*GD	September 2012	601	Biochemical Oxygen Dem	30D Qty	0.62	1.97479	9/1/2012
3IH00074*GD	September 2012	601	Oil and Grease, Hexane	30D Qty	0.75	.90178	9/1/2012
3IH00074*GD	September 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	5.77	9/6/2012
3IH00074*GD	September 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.8299	9/6/2012
3IH00074*GD	September 2012	601	Fecal Coliform	1D Conc	400	4000.	9/6/2012
3IH00074*GD	September 2012	601	Biochemical Oxygen Dem	1D Conc	15	16.	9/6/2012
3IH00074*GD	September 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	2.30128	9/6/2012
3IH00074*GD	September 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	3.4	9/20/2012
3IH00074*GD	September 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.73739	9/20/2012
3IH00074*GD	September 2012	601	Fecal Coliform	1D Conc	400	4000.	9/20/2012
3IH00074*GD	September 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	1.64829	9/20/2012
3IH00074*GD	October 2012	601	Nitrogen, Ammonia (NH3	30D Conc	1.6	2.785	10/1/2012
3IH00074*GD	October 2012	601	Nitrogen, Ammonia (NH3	30D Qty	0.09	.60596	10/1/2012
3IH00074*GD	October 2012	601	Biochemical Oxygen Dem	30D Qty	0.62	1.27233	10/1/2012
3IH00074*GD	October 2012	601	Oil and Grease, Hexane	30D Qty	0.75	1.08819	10/1/2012
3IH00074*GD	October 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	2.87	10/4/2012
3IH00074*GD	October 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.61919	10/4/2012
3IH00074*GD	October 2012	601	Fecal Coliform	1D Conc	400	1600.	10/4/2012
3IH00074*GD	October 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	1.35919	10/4/2012
3IH00074*GD	October 2012	601	Nitrogen, Ammonia (NH3	1D Conc	2.4	2.7	10/18/2012

3IH00074*GD	October 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.15	.59273	10/18/2012
3IH00074*GD	October 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	1.18546	10/18/2012
3IH00074*GD	November 2012	601	Nitrogen, Ammonia (NH3	30D Qty	0.19	.31067	11/1/2012
3IH00074*GD	November 2012	601	Biochemical Oxygen Dem	30D Qty	0.62	.81756	11/1/2012
3IH00074*GD	November 2012	601	Oil and Grease, Hexane	30D Qty	0.75	1.02195	11/1/2012
3IH00074*GD	November 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	.31067	11/8/2012
3IH00074*GD	December 2012	601	Nitrogen, Ammonia (NH3	30D Conc	3	11.155	12/1/2012
3IH00074*GD	December 2012	601	Nitrogen, Ammonia (NH3	30D Qty	0.19	2.40664	12/1/2012
3IH00074*GD	December 2012	601	Biochemical Oxygen Dem	30D Qty	0.62	1.14345	12/1/2012
3IH00074*GD	December 2012	601	Oil and Grease, Hexane	30D Qty	0.75	1.07873	12/1/2012
3IH00074*GD	December 2012	601	Nitrogen, Ammonia (NH3	1D Conc	4	18.1	12/6/2012
3IH00074*GD	December 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	3.90498	12/6/2012
3IH00074*GD	December 2012	601	Nitrogen, Ammonia (NH3	1D Conc	4	4.21	12/20/2012
3IH00074*GD	December 2012	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	.90829	12/20/2012
3IH00074*GD	December 2012	601	Biochemical Oxygen Dem	1D Qty	0.94	1.42392	12/20/2012
3IH00074*GD	January 2013	601	Nitrogen, Ammonia (NH3	30D Conc	3	3.01	1/1/2013
3IH00074*GD	January 2013	601	Nitrogen, Ammonia (NH3	30D Qty	0.19	.65301	1/1/2013
3IH00074*GD	January 2013	601	Biochemical Oxygen Dem	30D Conc	10	27.	1/1/2013
3IH00074*GD	January 2013	601	Biochemical Oxygen Dem	30D Qty	0.62	5.85521	1/1/2013
3IH00074*GD	January 2013	601	Oil and Grease, Hexane	30D Qty	0.75	1.87988	1/1/2013
3IH00074*GD	January 2013	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	.73482	1/10/2013
3IH00074*GD	January 2013	601	Biochemical Oxygen Dem	1D Conc	15	33.	1/10/2013
3IH00074*GD	January 2013	601	Biochemical Oxygen Dem	1D Qty	0.94	7.13208	1/10/2013
3IH00074*GD	January 2013	601	Oil and Grease, Hexane	1D Qty	1.12	1.36158	1/10/2013
3IH00074*GD	January 2013	601	Nitrogen, Ammonia (NH3	1D Qty	0.25	.5712	1/24/2013
3IH00074*GD	January 2013	601	Biochemical Oxygen Dem	1D Conc	15	21.	1/24/2013
3IH00074*GD	January 2013	601	Biochemical Oxygen Dem	1D Qty	0.94	4.57834	1/24/2013
3IH00074*GD	January 2013	601	Oil and Grease, Hexane	1D Qty	1.12	2.39818	1/24/2013

Frequency Violations

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/01/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/04/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/07/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/08/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/14/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/15/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/21/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/22/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/28/2012
3IH00074*GD	July 2012	602	00056	Flow Rate	1/Day	1	0	07/29/2012
3IH00074*GD	August 2012	602	00530	Total Suspended Solids	1/Quarter	1	0	08/01/2012
3IH00074*GD	August 2012	602	01042	Copper, Total (Cu)	1/Quarter	1	0	08/01/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/04/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/05/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/11/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/12/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/18/2012

3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/19/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/25/2012
3IH00074*GD	August 2012	602	00056	Flow Rate	1/Day	1	0	08/26/2012
3IH00074*GD	August 2012	602	01055	Manganese, Total (Mn)	1/Quarter	1	0	08/01/2012
3IH00074*GD	August 2012	602	00978	Arsenic, Total Recover	1/Quarter	1	0	08/01/2012
3IH00074*GD	August 2012	602	00980	Iron, Total Recoverabl	1/Quarter	1	0	08/01/2012
3IH00074*GD	August 2012	602	00515	Residue, Total Dissolv	1/Quarter	1	0	08/01/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/01/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/02/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/03/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/08/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/09/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/15/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/16/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/22/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/23/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/29/2012
3IH00074*GD	September 2012	602	00056	Flow Rate	1/Day	1	0	09/30/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/06/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/07/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/13/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/14/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/20/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/21/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/27/2012
3IH00074*GD	October 2012	602	00056	Flow Rate	1/Day	1	0	10/28/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/03/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/04/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/10/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/11/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/17/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/18/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/22/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/24/2012
3IH00074*GD	November 2012	602	00056	Flow Rate	1/Day	1	0	11/25/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/01/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/02/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/08/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/09/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/15/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/16/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/22/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/23/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/24/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/25/2012
3IH00074*GD	December 2012	602	00056	Flow Rate	1/Day	1	0	12/30/2012
3IH00074*GD	December 2012	602	00980	Iron, Total Recoverabl	1/Quarter	1	0	12/01/2012
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/01/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/05/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/06/2013

3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/12/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/13/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/19/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/20/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/26/2013
3IH00074*GD	January 2013	602	00056	Flow Rate	1/Day	1	0	01/27/2013
3IH00074*GD	August 2012	601	00400	pH	1/2Weeks	1	0	08/01/2012
3IH00074*GD	August 2012	601	00400	pH	1/2Weeks	1	0	08/15/2012
3IH00074*GD	November 2012	601	00610	Nitrogen, Ammonia (NH3	1/2Weeks	1	0	11/15/2012
3IH00074*GD	November 2012	601	00310	Biochemical Oxygen Dem	1/2Weeks	1	0	11/15/2012
3IH00074*GD	November 2012	601	00552	Oil and Grease, Hexane	1/2Weeks	1	0	11/15/2012
3IH00074*GD	August 2012	001	00400	pH	1/Week	1	0	08/01/2012
3IH00074*GD	August 2012	001	00400	pH	1/Week	1	0	08/15/2012
3IH00074*GD	August 2012	001	70300	Residue, Total Filtera	1/Quarter	1	0	08/01/2012
3IH00074*GD	August 2012	001	00300	Dissolved Oxygen	1/Week	1	0	08/01/2012
3IH00074*GD	August 2012	001	00300	Dissolved Oxygen	1/Week	1	0	08/15/2012
3IH00074*GD	November 2012	001	00400	pH	1/Week	1	0	11/22/2012
3IH00074*GD	November 2012	001	00300	Dissolved Oxygen	1/Week	1	0	11/22/2012
3IH00074*GD	December 2012	001	70300	Residue, Total Filtera	1/Quarter	1	0	12/01/2012

The renewal NPDES permit for this facility will be public noticed in the near future. You will have 30 days from the date of public notice to submit written comments to Ohio EPA regarding the draft permit. Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1255.

Respectfully,

Todd Surrena
Engineering Geologist
Division of Surface Water

TMS/cs

ec: Steve Wolf

cc: Wayne County Health Department

File: Industrial/Permit Compliance/OhioFarmsPacking