



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 11, 2013

RE: HOLMES COUNTY
CASE FARMS
NPDES PERMIT NO. 3IH00103
SFY 2013 CEI

Mr. Sammy Cole
General Manager and VP
Case Farms
P.O. Box 185
Winesburg, OH 44690

Mr. Cole:

On February 12, 2013, this writer conducted an inspection of the Case Farms facility in Winesburg. The intent of the inspection was to evaluate operations and maintenance of the facility and to discuss the previous inspection report with you and Randy Mattison. The compliance record was also reviewed as part of this inspection.

Observations of the Treatment System

The aeration tank appeared to have good color at the time of the inspection. Randy had indicated that the system was being used to store solids. As a result, the system was operating at a relatively high mixed liquor suspended solids concentration. Though this does not appear to be a problem in the winter when microbes are less active, the MLSS concentration will need to be reduced as the temperatures increase in the spring.

The clarifiers appeared satisfactory at the time of the inspection. Randy had indicated that a one to two foot blanket of sludge was being maintained in the system. There was no significant accumulation of scum or floating sludge on the surface of the clarifiers, which indicates a mixed liquor with good settling characteristics.

Topics of Discussion

Four items were discussed with you and Mr. Mattison during a meeting in your office that followed the inspection. The topics are as follows.

1. Sludge Storage:

The facility has only 20 days of sludge storage available. As discussed above, the operators are storing sludge in the treatment system during the winter with the idea that sludge will be wasted as temperatures warm in the spring. Proper control of the solids in a biological treatment system is critical to maintaining compliance. The twenty day storage that is currently available may create a problem with moving sludge out of the aeration tanks in the event we have an extended wet spring. This bottleneck in the system could cause compliance problems.

Wastewater treatment plants that land apply sludge maintain a six month storage capacity in the system in the event fields cannot be accessed to apply sludge. The six-month storage volume gives facilities the necessary flexibility in operations during periods when the sludge cannot be taken to the field for application.

Because Case Farms already operates a sludge press, constructing a covered concrete pad to store pressed sludge is potentially a simple solution. The pad gives the operators the option to press sludge whenever necessary to maintain the proper solids concentration in the aeration system. The pressed sludge will be further dewatered as it is exposed to the freeze/thaw cycles during the winter months. Because water will continue to leach from the sludge during storage, a drain system that directs the water back to the treatment system must be part of the pad design.

2. Laboratory Facilities:

Process control samples are collected daily from the treatment system to assess the condition of the system. Proper analysis of the process control samples requires adequate laboratories with proper equipment and space. It is the opinion of this writer that the current laboratory facilities limit the operators' ability to properly assess the operations of the system. In addition, the proximity of the current laboratory to the air blowers limits the accuracy of analytical test due to vibration from the equipment.

Based on the parameters and the frequency of analysis, it appears that the Case Farms laboratory is a Level II laboratory as defined by Recommended Standards For Wastewater Facilities, 1997 edition. As such, the following criteria is recommended for the Case Farms laboratory

- i) A minimum of approximately 300 square feet of floor space,
- ii) The cabinets and shelves selected may be of wood or other durable materials. Bench tops should be of acid resistant laboratory grade materials for protection of the underlying cabinets,
- iii) A laboratory grade sink and drain trap should be provided,
- iv) Laboratories should be air conditioned. In addition, separate exhaust ventilation should be provided,
- v) An analytical balance should be provided. A heavy special-design balance table, which will minimize vibration of the balance, is recommended. It should be located as far as possible from windows, doors, or other sources of drafts or air movements, so as to minimize undesirable impacts from these sources upon the balance,
- vi) Reagent water of a purity suitable for analytical requirements should be supplied to the laboratory, and
- vii) First aid equipment; protective clothing including goggles, gloves, lab aprons, etc.; an eyewash station and safety shower; and a fire extinguisher.

3. Storm Water Management:

During a drive-by of the Winesburg facility on January 29, 2013, this writer identified a significant amount of sediment leaving the site and entering the storm drainage system along County Road 160. The discharge was the result of a snow melt, precipitation event, or both. In addition to sediment runoff from the facility, the impervious areas added to the volume of runoff to the receiving stream. This additional volume of runoff can cause erosion with the stream bed due to the increased energy.

As discussed, Case Farms must evaluate the need for structural and nonstructural Best Management Practices (BMPs). Structural BMPs are those that require construction activities such as a sedimentation basin. Nonstructural BMPs are activities, such as a change in practices, to reduce the discharge of pollutants during precipitation events. Once the evaluation is completed and the decisions made regarding the various BMPs to be employed, Case Farms must update the Storm Water Pollution Prevention Plan (SWP3) to identify the selected BMPs. The plan must detail locations for structural BMPs to control sediment runoff in accordance with Part IV.D.2.a(1) of the NPDES Permit. Please refer to the document, "Rainwater and Land Development Manual" for guidance regarding the design and installation of BMPs that may be effective at Case Farms. An electronic version of the guidance document can be found at the following web address:

<http://www.dnr.state.oh.us/soilandwater/water/rainwater/default/tabid/9186/Default.asp>

When revising the SWP3, Case Farms should refer to Part IV of the NPDES Permit to identify the required content of the plan. The SWP3 must include all of the content required by the NPDES Permit. In particular, Items e, h, and i of Part IV.D must be added to the SWP3. It is requested that once the SWP3 is completed, a final copy be forwarded to this office.

A review of Section V of the NPDES Permit demonstrates that Case Farms fits into the definition for Category K – Animal Handling/Meat Packing. As a result, Case Farms must sample stormwater runoff from the site. The SWP3 should be modified to identify the sampling frequency for storm water runoff.

4. It was understood that periodically the wastewater treatment system experiences power outages. It was also understood that in the past, lift station #4 at the wastewater plant has overflowed as a result of power outages.

In order to address this concern, we discussed the installation of a backup generator to provide power to the treatment system during outages. As discussed, a generator currently being stored at Case Farms is available for installation. Mr. Mattison indicated that the generator could provide sufficient power to operator the treatment system if necessary. It is recommended that at the time the generator is installed, an autodialer be installed on the system to notify critical personnel that the generator has been activated.

In accordance with Ohio Revised Code 6111.45 and Ohio Administrative Code (OAC) 3745-42, Case Farms must apply for a Permit-to-Install (PTI) from Ohio EPA for installation of any structural BMPs such as sedimentation tanks, the sludge holding pads, and the generator. Following is the web address to download the forms and directions for applying for the PTI.

<http://epa.ohio.gov/dsw/pti/index.aspx>

The new laboratory should also be identified on the detailed plans submitted for the PTI.

Compliance Review

The compliance record for Case Farms was reviewed as part of this inspection. The period of review was January 2012 through February 2013. Following is a list of violations reported to Ohio EPA during the review period.

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2012	00610	Nitrogen, Ammonia	1D Conc	8.0	15.3	1/2/2012
January 2012	00610	Nitrogen, Ammonia	1D Qty	15.1	21.1952	1/2/2012
January 2012	00610	Nitrogen, Ammonia	1D Conc	8.0	16.6	1/3/2012
January 2012	00610	Nitrogen, Ammonia	1D Qty	15.1	24.3784	1/3/2012
May 2012	31616	Fecal Coliform	1D Conc	2000	3500.	5/8/2012
May 2012	00530	Total Suspended Solids	1D Conc	30	33.	5/29/2012
May 2012	31616	Fecal Coliform	1D Conc	2000	2800.	5/29/2012
June 2012	31616	Fecal Coliform	1D Conc	2000	2100.	6/14/2012
August 2012	00530	Total Suspended Solids	1D Conc	30	42.	8/28/2012
August 2012	00530	Total Suspended Solids	1D Qty	56.8	71.8544	8/28/2012
October 2012	00610	Nitrogen, Ammonia	1D Conc	4.5	7.14	10/17/2012
October 2012	00610	Nitrogen, Ammonia	1D Qty	8.52	11.1072	10/17/2012
October 2012	00610	Nitrogen, Ammonia	1D Conc	4.5	7.14	10/18/2012
October 2012	00610	Nitrogen, Ammonia	1D Qty	8.52	11.7017	10/18/2012

This office was properly notified of the violations in a timely manner. However, be advised that violations of the NPDES constitute violations of ORC 6111.07 and are subject to enforcement action.

Request for Response

A response to this inspection report is requested. The response must include the date the PTI application for site improvements will be submitted to Ohio EPA. The response should also indicate start dates for installation of the structural BMPs, the sludge storage pad, the generator, and the laboratory. The response should be submitted to this office no later than March 29, 2013.

General Construction Permit

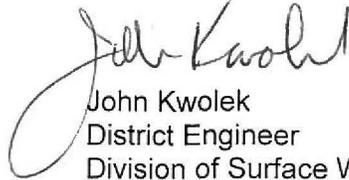
Be advised that the disturbance of land that exceeds 1 acre requires a general construction stormwater permit from Ohio EPA. It appears that past construction activities that exceeded 1 acre did not receive a general construction permit from Ohio EPA despite committing to this writer that the proper permits will be obtained. Be advised that Case Farms would be in violation of ORC 6111.07 in the event the proper general storm water permits for construction

CASE FARMS
MARCH 11, 2013
PAGE 5 OF 5

activities are not obtained. Failure to properly obtain the necessary general permit is subject to enforcement action.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.ohio.us in the event you have any questions regarding this inspection report.

Respectfully,

A handwritten signature in black ink, appearing to read "John Kwolek". The signature is written in a cursive style with a large, looping initial "J".

John Kwolek
District Engineer
Division of Surface Water

JK/cs

Cc. Randy Mattison, Treatment Plant Supervisor, Case Farms